



CHIEF EXECUTIVE'S REPORT
ON SUBMISSIONS RECEIVED

SOUTH DUBLIN COUNTY COUNCIL
**DRAFT CLIMATE CHANGE
ACTION PLAN 2019-2024**

MAY 2019

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1 Introduction

1.1 Purpose of the Report

South Dublin County Council has prepared a Draft Climate Change Action Plan 2019-2024. The Draft Climate Change Action Plan sets out how the Council will improve energy efficiency and reduce greenhouse gas emissions in its own buildings and operations, while making the South Dublin County Council area more adaptive to the impacts of climate change. The Draft Plan includes a range of actions across five key action areas, Energy & Buildings, Transport, Flood Resilience, Nature Based Solutions and Resource Management.

The Council undertook public consultation from Monday 11th February to Monday 25th March 2019. A total of 73 valid submissions were received.

This Chief Executive's Report summarises and details the outcome of the public consultation programme on the Draft Climate Change Action Plan and contains the following:

- lists the persons or bodies who made submissions or observations on the Draft Climate Change Action Plan;
- summarises the issues raised by the persons or bodies in the submissions or observations; and
- gives the response and recommendation of the Chief Executive to the issues raised.

This Chief Executive's Report on the Draft Climate Change Action Plan Public Consultation is hereby submitted to the members of South Dublin County Council for consideration.

1.2 Background

Ireland's first statutory National Adaptation Framework (NAF) was published in January 2018. This sets out the national strategy to reduce the vulnerability of the country to the negative effects of climate change and to avail of positive impacts. The NAF was developed under the Climate Action and Low Carbon Development Act 2015. The NAF outlines a whole of government and society approach to climate adaptation in Ireland. Under the NAF a number of Government Departments are required to prepare sectoral adaptation plans in relation to a priority area for which they are responsible. Under the NAF, each Local Authority is also required to make a local adaptation strategy by 30th September 2019.

In the Dublin Metropolitan Region, the four Dublin Draft Climate Change Action Plans have been prepared in partnership with Codema (Dublin's Energy Agency), following extensive and ongoing engagement with South Dublin County Council, and the other Dublin local authorities, throughout 2017/2018. The Draft Climate Change Action Plans address both climate change mitigation and adaptation. This is a result of the following: the Dublin local authorities are signatories to the EU Covenant of Mayors for Climate & Energy, which address both climate change adaptation and mitigation, and the significant experience of Codema in developing mitigation baseline emission inventories and the completion of a Spatial Energy Demand Analysis for the four Dublin local authorities and related mapping outputs.

1.3 Public Consultation

Public consultation on the Draft Climate Change Action Plan took place over a six-week period from Monday 11th February to Monday 25th March 2019, with 73 valid submissions received in total.

In addition, and in accordance with the Planning and Development (Strategic Environmental Assessment) Regulations 2004 to 2011, as amended, and Habitats Directive 92/43/EEC, a Strategic Environmental Assessment (SEA) Environmental Report and an Appropriate Assessment Natura Impact Statement, were also on public display.

2 Details of the Public Consultation Process

2.1 Objectives of the Public Consultation Process

The objectives of South Dublin County Council's draft Climate Change Action Plan 2019-2024's public consultation process were as follows:

- Increase awareness of the draft Climate Change Action Plan 2019-2024 for the general public, various stakeholders, prescribed bodies and SDCC staff
- Provide opportunities for more creative and dynamic engagement with a variety of interested parties, including younger citizens, older citizens and locally based community and residents' groups
- Increase the number, variety and quality of submission received, appropriate to the draft Climate Change Action Plan
- Encourage longer term engagement strategies beyond the draft Climate Change Action Plan stage and scope follow up activities
- To align with South Dublin County Council External and Internal Communication Strategy objectives
- To align with the public consultation objectives of the other Dublin Local Authorities and Codema

2.2 Outline of the Public Consultation Process

Article 13(2)(A) of the European Communities (Environment Assessment of Certain Plans and Programmes) Regulations 2014, SI 435/2004, as amended sets out that a competent authority shall publish notice of the preparation of a Strategic Environmental Assessment (SEA) Environmental Report and an Appropriate Assessment (AA) Screening Report in at least one newspaper with a sufficiently large circulation in the area covered by the plan and that a copy of the plan and report may be inspected at a stated place or places, at stated times during a stated period of not less than 4 weeks from the date of the notice. These are the statutory obligations with regard to public consultation. South Dublin County Council has exceeded its statutory obligations with regard to public consultation for the draft Climate Change Action Plan 2019-2024, and has used a variety of events, on line and supporting 'face to face' methods to consult and engage with citizens of South Dublin County and a range of other stakeholders and interested parties.

The draft Climate Change Action Plan 2019-2024 public consultation process involved the following key elements:

- A promotional event was held on Tuesday 19th February, 2019, in County Hall the official launch of South Dublin County Council's draft Climate Change Action Plan
- A promotional event was held on Saturday 16th February, 2019, in the Round Room at The Mansion House, Dawson Street, the official launch of the dedicated website www.dublinclimatechange.ie and the promotional video
- 4,000 individual users accessed www.dublinclimatechange.ie since it was launched until the public consultation period ended (11th Feb – 25th Mar 2019)
- A strategic Social Media campaign over Twitter, Instagram, LinkedIn and Facebook was carried out over the six week public consultation period using the #Councils4ClimateAction, proving to be hugely effective. Total impressions of posts by South Dublin County Council's

Communications Unit amounted to 148,657. Total engagement which includes likes, retweets and comments amounted to 2,346

- Codema acted as the central liaison point between all four Councils Communications teams and together a central message was formed around the plans and the 'make a submission' call to action
- A newspaper notice appeared in The Irish Times on 11th February 2019. The same notice appeared in local newspapers; the Gazette and Echo's on 14th February 2019. A copy of the Newspaper notice is contained in Appendix B
- Press releases were issued by the four DLA's and Codema in the run up to the public consultation period opening and the public events, resulting in widespread national and local media coverage such as the Irish Times, RTE Television Six-One and Nine O'Clock News Bulletins, Virgin Media One News Bulletins, RTE Radio 1 and Newstalk 106-108 fm
- Codema developed a generic information leaflet (2,000 copies printed) and event programmes (500 copies printed each) for the #Councils4ClimateAction events. This material helped to provide information on the Plans and to promote what was taking place at each of the events. These leaflets were widely available online to help spread the word and cut down on the need for printed copies
- Leaflets were distributed to all libraries and county buildings
- Briefings for elected members took place at all the Area Committee Meetings in early February 2019
- Public Consultation displays were available electronically at County Hall, Tallaght, Clondalkin Civic Offices and all of South Dublin County Council Libraries via the Council's dedicated Public Consultation Portal
- Public Consultation displays were available at Clondalkin Civic Offices and all South Dublin County Council Libraries
- In addition to the promotional event in County Hall there were three public information sessions took place in Tallaght Library, Clondalkin and Ballyroan Libraries
- A briefing took place with the Public Participation Network (PPN)



Figure 2.1: Photographs from County Hall Public Event 19-02-2019 hosted by South Dublin County Council



Figure 2.2: Photographs from the Library Public Consultations

2.3 Public Information Events

During the public consultation period, one evening Public Information Event, held on 19th February 2019, in County Hall, was undertaken together with members of the Climate Action Team, relevant departments of South Dublin County Council and Codema, were in attendance to answer the public's queries. This event required attendees to register on Eventbrite.ie where 78 people registered prior to the event. An equal number of people, 78, availed of the registration at the door. It was estimated that there were over 120 people in total who attended this event.

External stakeholders attended this event to provide information to attendees, SEAI (Energy), Go Car, Cycle Superstore, Nissan (Transport) and Stop Food Waste/ EPA Master Composters (Resource Management).

Three further Public Information Sessions were undertaken with members of the Climate Action Team in attendance to answer the public's queries, as follows:

Venue	Date	Time
Lucan Library	26Feb19	9.45-13.00
Ballyroan Library	27Feb19	9.45-13.00
Tallaght Library	01Mar19	9.45-13.00

Attendees at the events were participating as individuals but mostly on behalf of a local group for example, tidy towns associations, residents associations, or other organisations.

2.4 Engagement with Young People

All schools and most sporting organisations and young people groups in the functional area of South Dublin County Council were invited to the promotional event held in County Hall on 19th February 2019, it was unfortunate that this date clashed with school holidays.

Comhairle ná nÓg and Beaver Scouts from 103rd Dublin troop from Templeogue representing Scouting Ireland were in attendance.

3 Details of Submissions

3.1 Introduction

A total of 73 valid submissions were received, the breakdown of submissions are as follows:

Table 3.1: Overview of Submissions

On line Portal Submissions	36
Email Submissions	30
Posted/ Hand Written Submissions	7
Total Submissions	73

All submissions were read analysed and summarised. A list of the persons, organisations and bodies that made submissions is provided in Appendix A, an overview of the subjects raised is provided in Section 3.3. The categorisation and summary of subjects raised, together with the Chief Executive’s response and recommendations is contained in Section 5.0.

Note: The headings relating to the categorisation and summary of issues raised, together with the Chief Executive’s response and recommendations, follows that of the headings of the draft Climate Change Action Plan document.

3.2 List of Persons, Organisations and Bodies who made Submissions

Appendix A lists the persons, organisations and bodies that made written submissions. Each submission has been assigned an independent reference.

3.3 Summary of Issues Raised in Submissions

There were 73 submissions in total received for the South Dublin County Council draft Climate Change Action Plan 2019-2024, all 73 valid submission received by the Council were read and analysed. They translated into 246 items of submissions on the Milestones to be considered, the majority targeting the Action Areas. An analysis of the submissions has been carried out and the topics and issues raised have been extracted and categorised according to the Action Areas.

Each of the Action Area headings together with the number of times that issues were raised in relation to each section is detailed below. A submission may raise multi subjects and they are separated and appear as separate entries in the appropriate action area.

Many submissions were made to each of the Dublin Local Authorities but some to individual LAs only. While each plan is unique to its functional area a unified approach was taken to responding to submissions that were appropriate and regionalised.

4 Chief Executive's Responses

The Chief Executive has prepared a response and recommendation under the relevant Section of the draft Climate Change Action Plan. The listing and format of the Categorisation, Summary and Responses to issues raised, follows the document structure of the draft Climate Change Action Plan.

4.1 Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)

A Strategic Environmental Assessment (SEA) Environmental Report and an Appropriate Assessment (AA) Natura Impact Statement accompanied the public display of the Draft Climate Change Action Plan. The Chief Executive's report on submissions received includes a summary and consideration of all submissions on these documents and / or the SEA / AA process. In addition, any amendments proposed arising from the Chief Executive's recommendations have been screened for the purposes of SEA and AA. Where no amendments to the Draft Plan are proposed, these recommendations have also been screened for the purposes of SEA and AA.

The Elected Members shall have regard to the Strategic Environmental Assessment (SEA) Environmental Report, and any submissions made during the consideration of the Draft Climate Change Action Plan and before its approval. This is in accordance with the Planning and Development (Strategic Environmental Assessment) Regulations 2004 to 2011, as amended.

The Elected Members shall give consent for the CCAP only after having determined that the plan shall not adversely affect the integrity of a European Site (s) in line with SI 477 (EU Birds and Natural Habitats) Regulations 2011.

A SEA Screening Determination and AA Screening Determination are included in this Chief Executive's report, see Appendix C.

4.2 Structure of the Report

Amendments to the text of the draft Climate Change Action Plan are identified by their location with in the draft Plan, i.e. Introduction – The National Context – Ireland

Additions to the text are identified through the use of **green text**, for example:

The implementation, monitoring and future updates of the Climate Change Action Plan will be consistent with, and have regard to the Oireachtas 'Climate Change: a cross-party consensus on climate action' report (March 2019) and the Whole of Government Climate Action Plan.

Deletions to the text are shown in **red with strikethrough**, for example:

~~Use Eco-Merit programme to advise businesses on reducing waste~~

5 Categorisation, Summary and Responses to Issues Raised

5.1 Executive Summary

There were 73 submissions in total received for the South Dublin County Council draft Climate Change Action Plan 2019-2024, many submissions were made to each of the Dublin Local Authorities but some to individual LAs only. While each plan is unique to its functional area a unified approach was taken to responding to submissions that were appropriate and regionalised.

Some dealt with penalising single use plastics, chemical cleaning products, and cheap flights, and taxing food imports and high emission foods whilst subsidising local foods. Reductions in parking spaces were suggested and more EV and non-fossil fuel vehicle charging points. A submission sought for upgrades to Social Homes. Several sought to have conditions imposed through Planning on energy efficiency and also on the impact planning policy can have on reducing unnecessary travel. There were requests for more solar bins, recycling bins, signage on these bins and recycling initiatives. Alternatives to flood walls should be investigated and European models should be considered. Reference was made to Green mortgages, the Home Performance Index and the two baskets approach to emissions reduction and there should be links with sustainable businesses. An online dashboard should be developed.

Chief Executive's Response:

The submissions to this Chapter that are within the scope of the Plan are covered in either the main chapters: Energy and Buildings; Transport; Flood resilience: Nature based Solutions; Resource Management or in the General Comments Chapter.

5.2 Introduction

Public education was mentioned in the submissions received regarding this section as was retrofitting. The encouragement of green mortgages and consideration of carbon impact in procurement was raised as was a suggestion that the LEO link with sustainable businesses. Renewable sources including district heating and solar were the subject of some submissions and feed in tariffs were linked to these. A submission seeking consideration of food waste, campaigns around this, consideration of the carbon footprint of imports and the encouragement of local food was made. The use of Libraries was suggested for repair cafes, transport groups and air quality information. Consideration of roof gardens and pollinators was also included in submissions.

There were submissions seeking the enactment of the Citizen Assembly recommendations and linking with National Climate Action Policies.

Chief Executive's Response:

The submissions to this Chapter that are within the scope of the Plan are covered in either the main chapters: Energy and Buildings; Transport; Flood resilience: Nature based Solutions; Resource Management or in the General Comments Chapter.

5.3 Milestone 1: Initiate

5.3.1 Submissions regarding planning holistically for the wider climate change agenda, urban sustainability and quality of life for all citizens, wildlife and biodiversity in Dublin.

The Draft CCAP has been prepared to demonstrate the Council's commitment to addressing climate change across its own buildings, facilities and operations. The action areas in the Draft CCAP have been organised into the five key areas of Energy & Buildings, Transport, Flood Resilience, Nature Based Solutions and Resource Management. These areas reflect the Council's primary remit, with the aim of fostering greater collaboration across various Council departments. It is the aim of the Council to develop and implement actions that can be replicated by citizens, businesses, and other stakeholders. It is the aim of Council to contribute to the wider sustainable development of the county, by informing and updating citizens through CCAP actions that raise awareness of climate issues and solutions, that will facilitate wider projects and initiatives that contribute towards county-wide greenhouse gas emissions reduction and enhancing resilience to the impacts of climate change. This strategic approach will be of benefit to all citizens, wildlife and biodiversity in Dublin.

With regard to the wider holistic development of the county, it is noted that the CCAP will be reflected in a range of other plans and strategies made and adopted by the Council into the future, including the County Development Plan, Corporate Plan, Local Economic and Community Plan (LECP) etc. These plans provide an opportunity for further integration of climate change action across Dublin and the enhancement of a cross-sectoral approach to building the sustainability of Dublin City and County for future generations.

It is considered that the submissions pertaining to interaction between the Draft CCAP, the climate change agenda and wider sustainability issues are adequately addressed in the Draft Plan.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

Strategic Environmental Assessment (SEA) Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

Appropriate Assessment (AA) Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the Draft CCAP.

5.3.2 Submissions regarding implementation, efficiency and testing of the CCAP

The CCAP will be updated on an annual basis, with a review and revision every five years. At each revision the updated CCAP will take account of demographic, technical and other changes that have occurred and any new targets that have been introduced.

It is considered that the implementation, monitoring and iteration of the CCAP is adequately addressed in the Draft Plan.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the Draft CCAP.

5.3.3 Submissions were received relating to wider engagement between local authorities internal and external to the Dublin region.

Regarding ongoing engagement between local authorities internal and external to the Dublin region, it is noted that the development and implementation of the CCAP, will be supported by both Codema and the Dublin Climate Action Regional Office, which involve interaction between the four Dublin local authorities. Codema will provide ongoing support to the CCAP in the areas of research, planning, technical assessment, cost benefit analysis, procurement, project management, funding applications and communications. The Dublin CARO will work with all four Dublin local authorities in implementing CCAP actions, including developing research opportunities and pilot project across the four Dublin local authorities. The CARO will also have a role in reviewing action implementation across the four Dublin local authority CCAPs. There are a number of other regional structures such as the Eastern & Midland Regional Assembly (EMRA), Eastern - Midlands Waste Regional Office and the Local Authority Waters Programme whereby ongoing engagement with other local authorities on climate change issues can be facilitated.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the Draft CCAP.

5.4 Milestone 2: Research

5.4.1 Submissions regarding the science of climate change, support for renewable energy projects, public authority leadership, CCAP iteration, and developing best practice.

Submissions relate to the science and evidence base behind climate change and the Draft CCAP. The Draft CCAP Introduction outlines the policy and legislative context under which the Plan has been prepared. At an international level, the Plan has been prepared in line with the Conference of the Parties (COP21) Paris Agreement. This legally binding, global agreement sets out a long-term goal to put the world on track to limit global warming to well below 2 degrees centigrade above pre-industrial levels, and to pursue efforts to limit the temperature increase to 1.5 degrees. The Draft CCAP has also been prepared to respond to the findings of the Intergovernmental Panel on Climate Change (IPCC) Report on Global Warming of 1.5 °C, published in October 2018. At a national level the Draft CCAP has been prepared in accordance with relevant national legislation and policy including the Climate Action and Low Carbon Development Act 2015, National Mitigation Plan and National Adaptation Framework and Project Ireland 2040. The Draft Plan has also been prepared in accordance with the Local Authority Adaptation Strategy Development Guidelines, published in December 2018.

To inform the Action Areas, the Draft CCAP includes detailed climate change adaptation and baselines. The adaptation baseline has been prepared using a variety of sources, in particular Met Éireann data the Council's own extreme weather events records. This robust evidence based informed the future risk matrix included in the Draft CCAP. The mitigation baseline has been prepared using the Council's own energy consumption data, which is used to undertake the annual Sustainable Energy Authority of Ireland (SEAI) Monitoring & Reporting (M&R).

On this basis and having regard to submissions received relating to the science and evidence based behind climate change, it is considered that the Draft CCAP has been prepared have regard to the appropriate and consensus-based policy, legislative and baseline information.

With regard to leadership of the public sector and local authorities, it is the function of the Draft CCAP to outline actions that will directly improve the Council's own energy efficiency and reduce greenhouse gas emissions in its own buildings and operations, and Council led actions that aim to make South Dublin a more climate resilient county. The Draft Plan includes a range of ongoing and planned actions, across Council departments, including actions relating to renewable energy projects. Having regard to supporting other renewable energy projects including hydropower, solar etc., these are primarily supported by the Council, by way of the policies and objectives included in the County Development Plan and other plans and strategies.

Submissions relate to the future iterations of the CCAP. In the Draft CCAP Milestone 4 relates to Implementation and Milestone 5 relates to Monitoring and Iteration. The Council has established a cross-departmental Climate Team who will be responsible for implementing the actions included in the CCAP. The development and implementation of CCAP actions will be supported by both Codema and the Dublin Climate Action Regional Office. Codema will provide ongoing support to the CCAP in the areas of research, planning, technical assessment, cost benefit analysis, procurement, project management, funding applications and communications. The Dublin CARO will work with all four Dublin local authorities in implementing CCAP actions, including developing research opportunities and pilot project across the four Dublin local authorities. The CARO will also have a role in reviewing action implementation across the four Dublin local authority CCAPs.

The CCAP will be updated on an annual basis, with a review and revision every five years. At each revision the updated CCAP will take account of demographic, technical and other changes that have

occurred and any new targets that have been introduced. As the Council is a signatory to the EU Covenant of Mayors for Energy and Climate, this CCAP will be submitted to the Covenant to fulfil participation protocols. This commitment initiates the beginning of a long-term process, whereby the Council will be committed to reporting every two years to the Covenant of Mayors, on the implementation progress of the Plan. Participation in the Covenant of Mayors will also facilitate access to best practice project and benchmarks of excellence initiatives across Europe.

In implementing and monitoring the CCAP, the Council will adhere to current best practice guidelines in this area, namely The Covenant of Mayors for Climate and Energy Reporting Guidelines. This includes monitoring actions with regard to staff resourcing, action budget allocation, stakeholder and citizen engagement, CO2 emissions reduction etc.

Having regard to submissions received, it is considered that these matters are adequately address in the Draft CCAP.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.5 Milestone 3: Plan

5.5.1 Submissions regarding CCAP development, outlook and implementation, CCAP targets, addressing climate change in other sectors, and reference to wider climate change reports.

The National Adaptation Framework (NAF) was published in January 2018. This sets out the national strategy to reduce the vulnerability of the country to the negative effects of climate change and to avail of positive impacts. The NAF was developed under the Climate Action and Low Carbon Development Act 2015. The NAF outlines a whole of government and society approach to climate adaptation in Ireland. Under the NAF a number of Government Departments are required to prepare sectoral adaptation plans in relation to a priority area for which they are responsible. A further requirement of the NAF, each Local Authority is also required to make a local adaptation strategy by 30th September 2019. Accordingly, each of the four Dublin local authority has prepared a Draft Climate Change Action Plan, once approved by the Council, will be submitted to the Department of Communications, Climate Action and Environment.

With regard to CCAP targets, it is noted that the Draft CCAP has been prepared to address the following specific climate change targets:

- A 33% improvement in the Council's energy efficiency by 2020; and
- A 40% reduction in the Council's greenhouse gas emissions by 2030

In Ireland, the public sector has mandatory energy efficiency targets. It is set in the context of Ireland's EU and national commitments and wider climate change goals, whereby a target of 33% energy efficiency improvement is to be achieved by all Irish public bodies (as defined in Statutory Instrument 426 of 2014) by 2020. Public bodies are required to report annual energy efficiency data to the Sustainable Energy Authority of Ireland (SEAI) which manages the reporting process on behalf of the Department of Communications, Climate Action and Environment (DCCA). There is currently no statutory requirement to undertake sectoral mitigation plans, including revised sectoral, local authority emissions reduction targets.

Being a signatory to the EU Covenant of Mayors for Climate & Energy, the Council has voluntarily committed to a 40% reduction in the Council's greenhouse gas emissions by 2030. Across Europe, signatory cities pledge action to support implementation of the EU 40% greenhouse gas-reduction target by 2030 and the adoption of a joint approach to tackling mitigation and adaptation to climate change.

With regard to CCAP outlook and implementation, the Council has established a cross-departmental Climate Team who will be responsible for implementing the actions included in the CCAP. The development and implementation of CCAP actions will be supported by both Codema and the Dublin Metropolitan Climate Action Regional Office. Codema will provide ongoing support to the CCAP in the areas of research, planning, technical assessment, cost benefit analysis, procurement, project management, funding applications and communications. The Dublin CARO will work with all four Dublin local authorities in implementing CCAP actions, including developing research opportunities and pilot project across the four Dublin local authorities. The CARO will also have a role in reviewing action implementation across the four Dublin local authority CCAPs. The CCAP will be updated on an annual basis, with a review and revision every five years.

With regard to addressing climate change in other sectors, it is the function of the Draft CCAP to outline actions that will directly improve the Council's own energy efficiency and reduce greenhouse gas emissions in its own buildings and operations, and Council led actions that aim to make South

Dublin a more climate resilient county. In this regard, the Draft CCAP includes Action Areas across five thematic areas: Energy & Buildings, Transport, Flood Resilience, Nature Based Solutions and Resource Management. The Draft Plan includes a range of ongoing and planned actions, across Council departments, that will be continuously monitored, evaluated and updated to 2030 and beyond, with the support of Codema, the Dublin Climate Action Regional Office and other relevant stakeholders. Where relevant and appropriate, the actions in the Plan also have the scope to be replicated across other sectors, including the private sector.

Submissions relating to wider climate change reports are noted. At each revision of the CCAP, the updated Plan will take account of demographic, technical and other changes that have occurred and any new targets that have been introduced; this will include having regard to wider climate change reports and publications, as relevant and appropriate.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.6 Actions on Energy and Buildings

19 actions are outlined under the theme of Energy and Buildings in South Dublin County Councils Climate Change Action Plan 2019-2024. 19 submission items were received to the main Energy and Buildings chapter whilst a number of additional submissions were made throughout the other more general chapters. There are 8 new actions as a result of submissions with some new text also clarifying or expanding on issues raised in the submissions.

5.6.1 Submissions Regarding Energy Planning and Management: Review of Targets

1. 33% efficiency target. When I first began reading the draft, I was curious to know if the efficiency target amounted to 'savings from efficiency' i.e. reduction in absolute amount of energy use because of efficiency measures. I assumed it was as the only country I know still using per capita or per euro (energy intensity) indicators as their targets for efficiency is China. Although such targets show that energy intensity is reducing, total energy use can continue to increase. I was shocked to see that the SDCC target is based on KWh/Population. Notwithstanding that you consider that people would not understand the word 'capita' or at least use the word 'person', this is a very weak target given how essential it is to have 'savings from efficiency'. The EU 2020 targets include a 20% reduction in energy use as compared to a baseline project. The problem with SDCC using the KWh/capita indicator is that it allows total energy use of the council to increase. It thus renders it a weak target and one must question if this target was deliberately chosen so as to allow energy use to increase. This should be clarified. (SDCC-CCAP-201902-28)
2. Greenhouse Gas Emissions in preparing the Plan and SEA, the direct and indirect impacts of the Plan on greenhouse gas emissions and removals should be assessed. The Agency's most recent projections report Ireland's Greenhouse Gas Emissions Projections for 2017-2035 (EPA, 2018) should be taken into account. (SDCC-CCAP-201902-42)

As well as submission to SDCC a number of submissions to the other Dublin Local Authorities request a review of energy targets to be included in the Draft CCAP. The Draft CCAP has been prepared to address the following specific climate change targets:

- A 33% improvement in the Council's energy efficiency by 2020; and
- A 40% reduction in the Council's greenhouse gas emissions by 2030.

Chief Executive Response to Grouping: Energy Planning and Management: Review of Targets

In Ireland, the public sector has mandatory energy efficiency targets. It is set in the context of Ireland's EU and national commitments and wider climate change goals, whereby a target of 33% energy efficiency improvement is to be achieved by all Irish public bodies (as defined in Statutory Instrument 426 of 2014) by 2020. Public bodies are required to report annual energy efficiency data to the Sustainable Energy Authority of Ireland (SEAI) which manages the reporting process on behalf of the Department of Communications, Climate Action and Environment (DCCAE). SEAI have just announced that they will be releasing a 2030 target later on this year in conjunction with other upgrade measures they are doing to the system and the Council will reflect any changes in their own targets as required. The target base year is not linked to capita or persons. There is currently no statutory requirement to undertake sectoral mitigation plans, including revised sectoral, local authority emissions reduction targets.

Being a signatory to the EU Covenant of Mayors for Climate & Energy, the Council has voluntarily committed to a 40% reduction in the Council's greenhouse gas emissions by 2030. Across Europe, signatory cities pledge action to support implementation of the EU 40% greenhouse gas-reduction target by 2030 and the adoption of a joint approach to tackling mitigation and adaptation to climate change.

The Government has published the Draft National Energy & Climate Plan 2021-2030 (NECP). This first draft of the NECP takes into account energy and climate policies developed to date, the levels of demographic and economic growth identified in the Project 2040 process and includes all of the climate and energy measures set out in the National Development Plan 2018-2027. It is the first step in the process of putting together the final National Energy and Climate Plan and further iterations of the plan will take into account additional policies and measures and the All-of-Government climate action plan to be completed in 2019. A final version of the NECP will be submitted to the European Commission by 31st December 2019.

In March 2019, the Oireachtas published its '*Climate Change: a cross-party consensus on climate action*' report. The report recommends that new legislation be enacted by the Oireachtas, providing a new legal framework for tackling climate change. The report states that this should include the setting of legally binding GHG emissions targets for mitigation and renewable electricity for 2030 and 2050, reflecting the latest IPCC consensus and the need for Ireland to make immediate progress in meeting existing EU emissions reductions 2030 targets.

The Climate Action and Low Carbon Development Act 2015 and National Adaptation Framework require sectoral adaptation/climate change action plans to be submitted to Government for approval by 30th September 2019. The Climate Action and Low Carbon Development Act 2015, the National Mitigation Plan and the National Adaptation Framework, do not require additional public sector climate change targets to be implemented.

In summary, the Council will commit to review the energy and GHG emission targets following any revisions to these targets nationally as local authorities in Ireland have no statutory role in setting energy and climate change targets. It is considered that the identification of additional local authority energy and climate change targets is not appropriate at this stage, is pre-mature in advance of any revised national legislation in this regard, and; therefore, should not be included in the Draft CCAP. This matter should be primarily addressed at a national level, in advance of addressing such issues at a local authority level.

Chief Executive's Recommendation

The following additional new actions are proposed to the draft CCAP

New Actions:

Action: The Council Energy Review (mid 2019) and going forward, will include a glide path illustrating the energy efficiency and GHG emission targets for the Council up to and including 2030.

Action: Appendix II: Total Emissions in South Dublin of the CCAP, will also be updated every two years in accordance with EU Covenant of Mayors for Climate & Energy protocol.

SEA Comment

These two actions as recommend will provide information on the energy efficiency and targets through diagrams (glide path) as well as biannual updates of total emissions. These in and of

themselves do not give rise to landuse effects. No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

These two actions as recommend will provide information on the energy efficiency and targets through diagrams (glide path) as well as biannual updates of total emissions. These in and of themselves do not give rise to landuse effects and will not have the potential to result in likely significant effects to European Sites.

5.6.2 Submissions Regarding Energy Performance of Public/Private Buildings

Many submissions were received on this topic by the other Dublin Local Authorities requesting Councils to have an expanded remit in addressing the energy performance and design criteria of non-public sector buildings, including private residential, commercial and industrial buildings. It is noted that the energy efficiency and renewable energy requirements for the construction of new homes and non-residential buildings are primarily addressed in the current Building Regulations Part L and the nearly Zero Energy Buildings (nZEB) standard. The European Energy Performance of Buildings Directive Recast 2010 (EPBD) requires all new buildings to be nearly Zero Energy Buildings (nZEB) by 31st December 2020, and all buildings acquired by public bodies by 31st December 2018. Regarding non-residential buildings, all buildings are required to use up to 60% less energy than allowed under current regulations, plus a requirement for up to 20% of this final demand to be met with renewables, including solar. With regard to residential buildings, any dwelling receiving planning permission after 1st April 2019, should meet the nZEB standard. Substantial completion must have been achieved by 1st April 2020. After 2020 all homes irrespective of when they received planning permission should achieve the new standard. Accordingly, it is not within the remit of the Draft CCAP to introduce additional building standards that would serve to duplicate or exceed the requirements of the European Energy Performance of Buildings Directive.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.6.3 Submissions Regarding Mandating Roofs on New Buildings to include Renewable Energy Technologies / Green Roofs

1. Ensure all new domestic builds are A rated - have policy to back this up. All new industrial buildings to have solar or green roofs. (SDCC-CCAP-201902-11)

2. Install solar pv on all public buildings please - save money, increase local, secure energy, while being a leader. Look at Tipp CoCo and their work with TEA. Dare you go even further? (SDCC-CCAP-201902-11)
3. Has solar energy been considered? (SDCC-CCAP-201902-13)

Chief Executive Response to Grouping: Mandating Roofs on New Buildings to include Renewable Energy Technologies / Green Roofs

As standard all of the Councils new build social housing stock are fitted with solar photovoltaic (PV) panels. In addition, 188 solar PV panels have now been connected on the roof of County Hall, which will continue to reduce the electrical load of the building.

A number of submissions received also relate to mandating roofs on all new buildings to include renewable energy technologies and use as green roofs / green spaces. Submissions also request the prioritisation of south facing aspect for new dwellings, that current building regulation standards be exceeded, and the requirement for new buildings to have an A rated Building Energy Rating (BER).

It is noted that the energy efficiency and renewable energy requirements for the construction of new homes and non-residential buildings are primarily addressed in the current Building Regulations Part L and the nearly Zero Energy Buildings (nZEB) standard. The European Energy Performance of Buildings Directive Recast 2010 (EPBD) requires all new buildings to be nearly Zero Energy Buildings (nZEB) by 31st December 2020, and all buildings acquired by public bodies by 31st December 2018. Regarding non-residential buildings, all buildings are required to use up to 60% less energy than allowed under current regulations, plus a requirement for up to 20% of this final demand to be met with renewables, including solar. With regard to residential buildings, any dwelling receiving planning permission after 1st April 2019, should meet the nZEB standard. Substantial completion must have been achieved by 1st April 2020. After 2020 all homes irrespective of when they received planning permission should achieve the new standard. Accordingly, it is not within the remit of the Draft CCAP to introduce additional building standards that would serve to duplicate or exceed the requirements of the European Energy Performance of Buildings Directive. Furthermore, introducing specific requirements on renewable energy technologies may conflict with or impede the implementation of the building regulations / nZEB on any specific site for development.

Further to submissions received, it is noted that the requirement to provide green roofs / green space, will impact on the wider viability and effectiveness of rainwater harvesting systems for new buildings. It is considered that there are a range of options for flood alleviation and climate change adaptation opportunities for each development proposal and on a case by case basis. Accordingly, it is not within the remit of the Draft CCAP to prescribe the requirement of green roof / green space technologies on all new buildings. Furthermore, this is overly prescriptive and may limit the range of flood alleviation and climate change adaptations measures that are both viable and practical on each development site.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.6.4 Submissions Regarding Energy Efficiency, Renewables, Research and Innovation

1. Energy Efficiency in Council Buildings Leisure Centres – could we have fitness machines micro generating electricity from kinetic energy from e.g. rowing machines, treadmills etc.? (SDCC-CCAP-201902-11)
2. Use heat pumps wherever practical on SDCC heating requirements. (SDCC-CCAP-201902-11)
3. REFIT policy for selling back domestic solar PV to the grid - badly need to get buy in from general public and to attract higher purchase of domestic PV. (SDCC-CCAP-201902-11)
4. 'A key aspect of reducing energy use is public awareness, as retrofits, technology and innovation can only achieve a portion of SDCC's goals.' The only public awareness action is action is the home Energy Saving Kits available at only three or is it four (not clear) libraries at the moment. It is not clear how many libraries will have the kits or how many kits will be available. How many people use the libraries and how many people will be unaware of their existence? Is there a more basic equivalent or App that could be developed to reach a wider audience through SDCC website? How can the target of reduced GHGs and Energy Efficiency be achieved through the use of the kits or indeed measured as a result of accessing the kits? In addition, Climate change chapter in Local Area Plan (LAP) is confined to Tallaght Town Centre LAP. This would be better if expanded to include all LAPs as they arise. (SDCC-CCAP-201902-20)
5. Renewable Energy The recently published Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (DHPCLG, 2017) should be taken into account, where relevant. (SDCC-CCAP-201902-42)
6. Develop an action to promote common heating systems in public buildings. *The Living Building Challenge* should be adopted by SDCC for new builds to assist the development of sustainable building certification. (SDCC-CCAP-201902-46)
7. The Dodder alone used to house 41 mills along its banks. Could you look at developing small scale hydro along SDCC riverbanks? Perhaps tie into providing electricity to local domestic/services? Even perhaps rebuilding one of the old mills to generate kinetic energy? Could be a good local tourist attraction and would fit in well with heritage efforts. Also, perhaps offer grants to local schools/colleges to work on any such projects. (SDCC-CCAP-201902-11)
8. Look at ways of introducing small scale waste to energy schemes, perhaps in Tallaght hospital and perhaps in conjunction with waste management providers. (SDCC-CCAP-201902-11)
9. A reliable supplier of wind and solar energy installation providers should be marketed to home owners who are willing to pay privately to reduce their energy reliance on the government's system. Currently there are several companies providing such services but how regulated are they? How much are they held to long term service contracts for installations? There are fears that such companies can close down leaving private individuals who have invested heavily without a service company for their ten year warranty system etc. (SDCC-CCAP-201902-17)
10. Public buildings should allow for micro energy generation. (SDCC-CCAP-201902-06)
11. The RIAI strongly supports South Dublin County Council's vision of a zero-carbon city where all energy comes from renewable sources and where all buildings will have been built or retrofitted to near zero building standards. However, the current plan requires more ambitious strategies to realise a zero-carbon city. The RIAI strongly encourages South Dublin County Council to quantify the overall value of renovation vs. demolition of its existing stock using cost-benefit analysis, including energy efficiency, historic value of the buildings, embodied carbon. The RIAI also

suggests the approved version of the plan include a clear strategy for vacant and under-used properties in Dublin City. High quality energy upgrades could bring these properties back to life and reduce our building emissions. This way we could create new space for families in good locations. This would reduce our transport emissions and avoid emissions from new construction. The professional facilitators of development are key players in affecting development standards and should be recognised as influential ‘Stakeholders’. This group would include architects, engineers, project managers, estate agents, financiers and others. Policies and objectives must be supported by constant monitoring of the consequent effect of every action and the implementation of an appropriate response where objectives are not being attained.

Energy Efficiency And Renewables - It is essential to support micro-generation in dwellings and non-domestic buildings throughout both the public and private sector. Smart metering, feed-in tariffs and reduced costs of PVs will facilitate this initiative. However, building owners must have certainty that their investment in renewables will not be negated by developments subsequent to their efforts and that are out of their control. A Code of Practice or planning control is urgently needed to define the rights of the individual to access to solar (or indeed wind / heat pump) energy. It is essential for the orderly development of micro-generation, in urban, suburban and rural settings, that investors have certainty about their rights to continued access to renewable resources, including consideration of future over shading by buildings or vegetation, disruption of wind, overheating/cooling of ground water. The RIAI has a paper available (on request) that explores this significant issue. The proposals include positive reference to council’s own building stock. More focus on the strategy for the necessary improvements to the non-council owned building stock is required. There is little reference to measures to optimise the use of our existing building stock by measures such as ‘living over the shop’ and urban renewal. Such a focus would have multiple benefits from a climate change view as well as social and financial benefits.

Social Housing – The Council could set a specific target, in line with the EU Commission’s Roadmap to 2050, of bringing 3% per year of its housing stock to NZEB level, either by replacement or preferably by upgrading. Reference should be made to the Council’s retrofitting strategy whereby a number of large projects are in planning to regenerate council owned housing by upgrading the existing buildings, and adding additional apartments where site area permits. The upgrade measures involve not only deep energy retrofit and better space standards, improved accessibility and use of external spaces.

SDCC CC AP - What does the figure of 10,710 tonnes CO2 mean? Should it be corrected / clarified as the Council’s own operational impact? If so perhaps it would be more appropriate to also reference the data from all public and private overall sources within the council area. The figures seem disproportionate to the 2016 Ireland emission figure 68,550,000 tonnes CO2 estimated by EPA April 2018. Would it be more effective to utilise Tonnes of oil equivalent as the metric, rather than GWh? (SDCC-CCAP-201902-27)

12. Social Housing upgrades – does this include affordable housing stock? If not, can you look into expanding it? (SDCC-CCAP-201902-11)

Chief Executive Response to Grouping: Energy Efficiency, Renewables, Research and Innovation

A number of submissions seek to have buildings retrofitted to A ratings or nZEB. Some suggestions refer to the need to include a big increase in the use of renewables in particular of solar energy. Micro-generation and feed in tariff also formed the subject of several submissions. Others sought ways to encourage/incentivise private landlords to improve energy efficiency and sought the extension of the Home Energy Saving Kits. Generally, there were a few submissions that sought the consideration of Geothermal Sources and others that encouraged the District Heating proposal.

Building Energy Standards - New Developments: In accordance with Directive 2010/31/EU of the European Parliament and the Council of 19 May 2010 on the energy performance of buildings (recast), all new dwellings will be nearly zero energy dwellings by 31 December 2020. All New Developments are being constructed to NZEB as required under the Building Regulations (Part L – Conservation of Fuel and Energy – Dwellings (2017)).

Building Energy Standards - Existing Buildings: In accordance with new EU requirements (EPBD 2018/844/EU), all existing buildings must be deep-retrofitted to NZEB standard by 2050 at a rate of 3% of building stock per year. New building regulations to this effect will be introduced by March 2020 in tandem with a national long-term renovation strategy. In line with this, South Dublin County Council will devise and implement a deep-retrofit programme for public housing and other civic, recreation and amenity buildings.

Use of Renewable Energy Technologies: these are always considered and implemented in all new and retrofit South Dublin County Council Housing Developments in line with the requirements of revised Part L Building Regulations 2017. The technology, products or equipment considered include solar thermal systems, solar photovoltaic systems, biomass systems, systems using biofuels, heat pumps, aero generators, and district heating systems.

Home energy saving kits: The kit is available to borrow free of charge from South Dublin County Council Libraries, from a selection of Kildare, Kilkenny and Wexford Libraries, and all libraries in Roscommon, Leitrim and Cork City. The kit can be borrowed for a period of 2 or 3 weeks (lending periods vary from county to county), and helps you take the first step in becoming more energy efficient by identifying problem areas in your home and helping you make sense of the energy you consume on a daily basis. Action 17 of the Plan covers monitoring and developing the Home Energy Saving Kit scheme in SDCC libraries.

Micro-generation in Dwellings and Non-domestic dwellings

It is considered that onsite micro-generation technologies can contribute towards energy efficiency and reducing energy costs for both dwellings and non-domestic dwellings.

The Planning and Development Regulations 2007 (S.I. No. 83 of 2007) set out planning exemptions for micro-renewable energy technologies for residential dwellings, and came into effect from 28th February, 2007.

The Planning and Development Regulations 2008 (S.I. No. 235 of 2008) give effect to exempted development provisions in respect of renewable technologies for industrial buildings, business premises and agricultural holdings. The Regulations provide exemptions for wind turbines, combined heat and power (CHP) plants, solar panels and biomass boiler units, subject to certain conditions, across each of the sectors. The Regulations came into effect from 2nd July 2008.

Larger proposals for onsite microgeneration projects are addressed by way of the Development Management process, as set out in the Planning & Development Act 2000 (as amended) and related regulations. Local authority policies and objectives for such onsite and renewable energy projects are included in the County Development Plan.

In March 2019, the Oireachtas published its '*Climate Change: a cross-party consensus on climate action*' report. The report recommends that the number of solar PV panels permitted without planning permission was restrictive and that this should be addressed, so as to enable increased microgeneration capacity in homes, farms and businesses without the need for planning permission. The report also notes that Ireland must legislate for a re-configuration of the electricity market to

make it possible for community-scale projects and private micro-generation “prosumers” (both a producer and consumer of electricity) to be able to sell any surplus electricity back into the grid.

It is noted that the Microgeneration Support Scheme Bill 2017 was referred to the Select Committee of Seanad Éireann in November 2018.

Social Housing Upgrades

South Dublin County Council has an ongoing energy upgrade programme for our Social Housing units to achieve BER improvement.

Links to Professional bodies

South Dublin County Council is committed to participating with the RIAI in particular the Sustainability Task Force in seeking new and innovative approaches to Climate action in the built environment:

Geothermal Energy

Geothermal energy is defined as the energy stored in the form of heat beneath the surface of the earth (RES Directive 2009/28/EC), geothermal energy technologies can then harness this heat for power and/or heating applications. There are two types of geothermal energy, shallow and deep:

- Shallow geothermal or ‘ground source heat’ is typically used for space heating and cooling and can be used for domestic purposes.
- Deep geothermal energy is used for large scale purposes, such as District Heating, Industrial applications and electricity generation.

A ‘shallow geothermal’ or ‘ground source heat’ takes heat from the ground. This heat comes from energy that is radiated from the sun, which is then stored below the ground where the ground acts as a large collector of solar energy. Heat also comes from the core of the earth. The Geological Survey of Ireland (GSI) states that ‘In Ireland, our climate is particularly well suited for harnessing this ‘shallow’ geothermal energy, as subsoil and groundwater temperatures are near constant for the majority of the year.’

Deep geothermal energy tends to be deeper than 400m, is primarily the heat produced in the Earth’s subsurface, and is heat stored in rocks (and soil), or geothermal fluids (water, brine, vapours). Typically, the capital cost of installing a deep geothermal system is expensive. However, there are considerable environmental benefits, as they are cheap to run once installed, there is a guarantee of endless heat supply, and it is a sustainable and clean energy.

District Heating:

As part of the HeatNet project South Dublin County Council is developing a heating system to supply low-carbon heat to offices and businesses in the Tallaght area. Waste heat will be taken from local industry and delivered through insulated pipes to the buildings connected to the system, replacing fossil fuel heating systems and therefore reducing air pollution and GHG emissions. This project is a high priority for South Dublin County Council. Heatnet will run until 2020 and will receive European Regional Development Funding through the INTERREG North West Europe programme.

Private Landlords

The current legislation [Housing (Standards for Rented Houses) Regulations 2019] in relation to maintaining standards in the private rented sector came into effect on the 1st July 2017. These

regulations now require all rooms in a rented property to be provided with adequate heating. Requirements in relation to ventilation continues to be a requirement of the legislation.

The Residential Tenancies Board provide information to tenants and landlords as well as to the general public on their rights and obligations, in terms both of living and providing accommodation in the rental sector.

Chief Executive's Recommendation

It is recommended that the following actions be added to the Draft CCAP as follows.

New Actions:

Action: South Dublin County Council is committed to participating with the RIAI in particular the Sustainability Task Force in seeking new and innovative approaches to Climate action in the built environment:

Action: Identify sites for trialling renewable energy projects, including solar PV and Geothermal technologies.

SEA Comment

Actions relating to long term building renovation and new and innovative climate action in the built environment are consistent with a number of SEOs in particular, material assets, climate change and air quality, population and human health as well as indirect positive effects in relation to cultural heritage and landscape.

The identification of new sites for trialling renewable energy projects such as geothermal should utilise the GIS data in particular. Existing measures in the South Dublin CDP, the CCAP, SEA ER and NIS will also apply. Subject to full implementation as appropriate, no adverse environmental effects are identified.

AA Comment

Actions relating to long term building renovation and new and innovative climate action in the built environment within South Dublin will not result in land use effects with the potential to negatively affect European Sites. The renovation of existing buildings will not have the potential to result in likely significant effects to European Sites.

The identification of site for trialling renewable energy projects such as solar PV and geothermal will not in itself have the potential to result in likely significant effects to European Sites. It is noted that any renewable energy project progressed within any such site identified on foot of this amendment will be subject to screening for Appropriate Assessment and where required a Natura Impact Statement. In addition existing measures that aim to protect European Sites as outlined in the NIS for the CCAP and the NIR for the CDP will be required to inform the site identification process.

5.6.5 Submissions Regarding the Use of LEDs in Public Lighting and in Social Housing

1. Lighting energy use campaign to show what SDCC is doing re public lighting. Early target date for replacing 100% of public lighting with LEDs. Encourage groups who get grant aid from SDCC to reduce their energy consumption by the introduction of specific grants for LEDs, renewable solar panels, insulation, efficient windows / doors, etc. (Government should also support this action.). Practical support for community groups, clubs, sports centres, households, etc. to reduce energy consumption. (SDCC-CCAP-201902-32)

Several submissions received by the other Dublin Local Authorities requested that the replacement of existing public lights with LEDs be included in the draft CCAP. Submissions also expressed concern on the quality of lighting and the impact on nature, on photobiological safety and on circadian rhythms.

Chief Executive Response to Grouping: Use of LEDs in Public Lighting and in Social Housing

Continue LED lighting upgrade programme to increase on 35% of the network already upgraded. Achieve energy reduction targets to 2020 and continue with column upgrade programme. Our immediate and most important priority is to fulfil our target energy reduction requirement of 33% from 2006 baseline levels to 2020 levels, in line with the national requirement. This is targeting our most energy inefficient lighting which is currently still (in spite of ongoing LED upgrades) at just under 30% of our entire stock and is a considerable challenge on our resources. Once, the 2020 target is addressed, we will then reconsider our position regarding allocation of resources.

Careful selection and specification of LED luminaires improves the overall quality of lighting on streets leading to improved colour rendering, less sky glow and less spill / trespass light, reducing the impact on the environment. In combination with good lighting design and better optical control (through the use of individual LED lenses) LED luminaires can deliver the required amount of light in the right area. All LED upgrades and schemes are designed to meet the European / British Standards so patchiness and shading should not be an issue. Occasionally because of the existing lighting infrastructure layout, it is not possible to completely meet the standard. Typically, this occurs on streets where the spacing between lighting columns is large and the column heights are low.

In relation to blue light it is accepted that the 'blue light' component can affect circadian rhythms and that is why it is South Dublin County Council policy to use LED luminaires with a 'neutral white' colour temperature (around 4000 degrees Kelvin or less) in all lighting schemes. In some locations, particularly conservation areas (e.g. along sections of the canals), even lower colour temperatures than 4000 Kelvin are being considered to reduce the effect on species such as bats. However, there is always a trade-off between energy consumption (and therefore reduced carbon footprint) on the one hand and photo biological considerations on the other where lower colour temperature luminaires consume more energy than higher colour temperature luminaires.

With regard to 'photo biological' safety all LED luminaires procured by South Dublin County Council are in accordance with the requirements of European Standard EN62471:2008 'Photobiological Safety of lamps and lamp systems'.

Lights levels used on different roads and streets around the county are determined by the categories of road and the levels of vehicular and pedestrian traffic on that road. Crime and anti-social behaviour is also a consideration in particular in residential areas. Lighting levels on busy roads, are typically higher than those that would be encountered in residential areas.

With regard to reducing light pollution LED luminaires direct the light to where it is required thus reducing light pollution such as Sky glow and minimising light spill / trespass, through better optical

control of light sources. Correctly specified LED luminaires achieve that. Older lamp types such as low pressure sodium lights (orange type lights) throw light in many directions resulting in the Sky glow (orange glow in the night sky) that can be seen over many towns and cities around the country.

Protection of wildlife and supporting the rich array of biodiversity that exists in the county particularly in conservations areas such as along canals and rivers is important. For example, it is known that some of these conservation areas are feeding routes for Bats.

In this respect South Dublin County Council will follow guidance and codes of practise that is available from the Institution of Lighting Professionals in the UK and other relevant professional Institutions in Europe, to advise on suitable measures to ensure that the impact of street lighting is minimised and that the rich array of biodiversity is protected as far as is practical.

Chief Executive's Recommendation

It is recommended that no change be made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.6.6 Submissions Relating to Financing Building Energy Upgrades and Public Awareness

1. Retrofit & insulate all SDCC owned buildings. (SDCC-CCAP-201902-11)

Submissions received by the other Dublin Local Authorities relate to the need for information on funding and grant opportunities for home energy upgrades, public awareness programmes, Council led financing schemes, incentivising landlords to upgrade rental properties, information on feed in tariff scheme and renewable electricity support schemes, and additional advertising on national grants such as those from the Sustainable Energy Authority of Ireland.

Chief Executive Response to Grouping: Financing Building Energy Upgrades and Public Awareness

Action 11 and 12 of this action area commit to deep retrofits of the Councils housing stock as well as energy efficiency works in Council operated buildings. In March 2019, the Oireachtas published its '*Climate Change: a cross-party consensus on climate action*' report. The report recommends that in order for a fair energy transition to take place, tailored advice and appropriate financial mechanisms need to be provided for all citizens. The report also states that there would be value in SEAI, along with Energy Agencies and any other bodies which offer financial assistance, re-evaluating the effectiveness and equity of current grant schemes. It is considered that low- and ordinary-income households should be enabled to retrofit their homes amongst other climate change measures. The report recommends the introduction of new financing options such as: de-risked loan facility, green mortgages, '*pay as you save*' type schemes and a deferred repayment loan scheme.

Having regard to the submissions received, it is noted that the Council has a direct remit in retrofitting and refurbishing its own social housing stock, and it is considered that this issue is adequately

addressed in the Draft CCAP. At present, the Council does not have a remit or mandated obligation to provide finance or grant support to private sector residential retrofit or refurbishment works.

However, it is recognised that there is a need to foster and build momentum on wider citizen engagement in climate change, including dissemination of information on residential property retrofitting and refurbishment options and financing. Local authorities have significant experience in engaging citizens through their existing functions, including land-use planning, housing, employment, transport and environmental awareness. Local authorities are also engaged in existing public participation structures and approaches that are bottom-up, local community centred and are outcome focused. These include the Public Participation Networks, Local Community Development Committees (LCDP), Tidy Towns, Sustainable Energy Communities etc.

It is considered that by implementing and updating the CCAP into the future, strengthening existing networks and creating new climate change links, this will progressively inform and encourage all citizens, communities and other stakeholders to have increased access to information and advice. Interest areas could include identification and implementation of relevant energy efficiency measures, renewable energy actions, climate adaptation and resilience measures, access to funding sources such as SEAI grant schemes, the Climate Action Fund etc.

Local authority efforts in citizen and community engagement should be supported by the Climate Action Regional Office, the Environmental Protection Agency and other relevant stakeholders. It is part of the CARO remit to engage and support the National Dialogue on Climate Action on a local and regional basis, and also to develop education and awareness initiatives for the public, professionals, schools, NGOs and other agencies engaged in driving the climate change agenda.

Chief Executive's Recommendation

It is recommended that the following amendment be made to the Draft CCAP as follows:

Under 'Public Awareness' section the following text shall be added:

In implementing and updating the CCAP into the future, strengthening existing networks and creating new climate change links, should be maximised to encourage all citizens, communities and other stakeholders to have increased access to information and advice. Interest areas could include identification and implementation of relevant energy efficiency measures, renewable energy actions, climate adaptation and resilience measures, access to funding sources such as SEAI grant schemes, the Climate Action Fund etc.

Local authority efforts in citizen and community engagement should be supported by the Climate Action Regional Office, the Environmental Protection Agency and other relevant stakeholders. It is part of the CARO remit to engage and support the National Dialogue on Climate Action on a local and regional basis, and also to develop education and awareness initiatives for the public, professionals, schools, NGOs and other agencies engaged in driving the climate change agenda.

SEA Comment

This additional text relates to citizen engagement and awareness and does not form a specific action. Whilst positive interactions with population and climate change SEO, no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.6.7 Submissions Regarding Embodied Carbon

1. The RIAI strongly encourages South Dublin County Council to quantify the overall value of renovation vs. demolition of its existing stock using cost-benefit analysis, including energy efficiency, historic value of the buildings, embodied carbon. (SDCC-CCAP-201902-27)

Chief Executive Response to Grouping: Embodied Carbon

SDCC is currently studying examples of best practice in regard to delivering low carbon and resource efficient construction projects. The intention is to put in place practices and procedures, which ensure that in designing buildings we make fully informed decisions in regard to the environmental impact of our developments.

Chief Executive's Recommendation

It is recommended that the following new action be included in the Energy and Buildings section of the CCAP.

New Action:

The Council will investigate the Lifecycle Assessment of Traditional and New Construction Methods for Residential Projects in Dublin.

SEA Comment

Positive interactions with SEOS relating to lifecycle assessment research. At this juncture no landuse effects are identified and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.6.8 Submissions Regarding the Impact of the Built Environment on Birds:

A submission was received by the our Environmental Consultant seeking consideration of birds in construction, in particular swifts.

Chief Executive's Recommendation

It is recommended that the following new action is added to the Draft CCAP.

New Action:

In all building projects, new build or retrofit, Swift Bricks or other nesting sites for swifts will be provided where practicable. The presence of swift breeding sites will be identified to ensure that known breeding sites are not lost as a result of construction work.

SEA Comment

This action relating is included on foot of a submission by Birdwatch Ireland. Positive effects in particular in relation to Biodiversity SEOS and no significant environmental effects are identified for this CE recommendation.

AA Comment

The Action will have positive implications for biodiversity and will not have the potential to result in likely significant effects to European Sites. The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.6.9 Submissions Regarding the Built and Archaeological Heritage

1. While the current draft action plan does set out a cohesive structure and determine specific actions in relation to Climate Change for South Dublin County Council there are no references, provisions or actions relating to the historic building stock of South Dublin County Council despite the fact that one of the 12 National Climate Change Adaptation Sectoral Plans will specifically deal with Built Heritage (Climate Change Adaptation Section Plan for Built and Archaeological Heritage) which is currently being developed by the Department of Culture, Heritage and the Gaeltacht. This is a significant deficiency in the Draft South Dublin County Council plan with regard to the Historic built environment but also appears to be missing from the other three Dublin plans. It is essential that the impact on architectural heritage is considered, included and planned for in the Climate Change Action Plan. The undersigned is currently the Chairperson of the Association of Architectural Conservation Officers (AACO) and is part of the Advisory Committee on the Climate Change Adaptation Sectoral Plan for Built and Archaeological Heritage. In my role as South Dublin County Councils Architectural Conservation Officer I have first-hand experience and knowledge of the current issues and concerns relating to climate change and how these are directly affecting our historic built environment. Within the Action Area of the current draft of South Dublin County Councils Action Plan one of the main action types identified for the section on Energy & Buildings is *Upgrades in buildings using Energy Performance Contracts* - Architectural conservation is a form of sustainable development as it retains and uses existing historic buildings that were generally built from locally sourced breathable materials (thatch, mud, lime, stone, brick, slate etc.) and already have invested embodied carbon. Any energy efficiency upgrade though of such buildings needs to ensure that it is appropriate and sensitive to historic construction methods and materials and not based on standards for impermeable new build. This is an area that requires further research and the production of specific Irish best practice examples as in the past there tended to be a reliance on UK practice. Relevant Guidance/Documents to inform development of relevant actions: Department of Environment, Heritage and Local Government (2010) – *Advice Series: Energy Efficiency in Traditional Buildings*. Dublin City

Council (DRAFTED AND DUE TO BE PUBLISHED LATE 2019) - *Built to Last – Energy Efficiency of pre-1945 historic Dublin Dwellings*. Department of Arts, Heritage and the Gaeltacht (2012) – *Shaping the Future, Case Studies in Adaptation and Resilience in Historic Urban Environments*. Heritage Council with SEAI and ICOMOS Ireland (2018) - *Deep Energy Renovation of Traditional Buildings: Addressing Knowledge Gaps and Skills Training in Ireland*. Historic England (2015) – *Facing the Future: Foresight and the Historic Environment*. Historic Scotland (2012) – *A Climate Change Action Plan for Historic Scotland 2012-2017*. Recommendations: The areas that need to be developed within Climate Change Action Plan for South Dublin County Council in relation to architectural heritage are: Risk Assessment - Identification of threatened/vulnerable architectural and heritage sites. Introduce requirements for future climate proofing when granting planning for works on historic buildings. Establish a baseline for architectural heritage resources from which change can be measured such as using existing surveys and maps NIAH, GIS mapping system and OPW flood maps. Building Resilience – Preparation, awareness and appropriate mitigation measures/guidance for vulnerable historic sites (ensuring that any interventions are sensitive to the elements that make the sites of special significance). Undertake survey and recording of high-risk assets such as ruinous structures. Where possible increase the resilience of architectural heritage resources under current conditions. Best practice energy upgrades - Research (incl. best practice case studies) for improving energy efficiency in traditional/historic buildings in particular those that have been implemented and completed by South Dublin County Council. Potential of architectural conservation as an engagement tool for cross-sector research and initiatives, public engagement and education in relation to climate change and adaptation. *It is recommended that the above areas for inclusion should be included in the Energy & Buildings Action Areas as part of the five key action areas for implementation of Climate Change Action Plans to ensure the area of Architectural Conservation/Historic Built Environment is reflected in the Dublin Local Authorities remits*. Proposed Actions: It is asked that the following actions be included in the plan to achieve and implement the following: 1. Carry out a Climate Change Risk Assessment of South Dublin County Council Cultural Heritage to identify and survey the architectural heritage of the County and designed landscapes (both those with statutory designation and those with no specific protections) and other climate change threats (e.g. surface water flooding, storm damage, pollution, biological growth, stone decay). Note: Utilise the *Building Dossiers already completed for Council owned protected structures, Assessments and Appraisals completed under County Development Plan Reviews for Protected Structures and Architectural Conservation Areas*. 2. Apply (where they exist) or produce guidance notes on the steps for owners of historic properties to follow in the immediate aftermath of a disaster. Note: Dept. of Culture, Heritage and the Gaeltacht have a draft Advice Series publication on Disaster due to issue in 2019. 3. Develop on-going maintenance and condition survey programmes for South Dublin County Councils historic buildings that are informed by climate change predications and sites identified at particular risk from climate change impacts. 4. Devise Disaster Risk Management Plans for South Dublin County Council owned Historic Structures/Buildings i.e. Carnegie Libraries, other public structures currently in use by the Community Department. Ensure the personnel, procedures and equipment are available and identify the vulnerabilities and the priorities for mitigation measures or for rescue/salvage in a disaster situation. 5. Conduct research and seek to develop South Dublin County Councils research-based case studies on appropriate and sensitive retro-fitting/energy upgrading of

traditional /historic buildings to inform works both to Council owned properties and to guide private owners. 6. Research historic land management systems in South Dublin County Council to determine if these should be re-instated, adapted or introduced elsewhere to control climate change impacts. 7. Continue to provide an Architectural Conservation Budget which is managed by the Councils Architectural Conservation Officer. Devise a list of Council owned protected structures where energy efficiency upgrading could be achieved and facilitated as works under the Architectural Conservation Budget. 8. Energy efficiency upgrading works and works to tackle climate change issues should be given priority under the list of Architectural Conservation projects proposed each year for Council owned protected structures in particular where the building is in community use. The undersigned is happy to provide further advice and information on the above items and would welcome the opportunity to be part of the current Climate Change Plan Working group for South Dublin County Council. (SDCC-CCAP-201902-11)

Submissions received by South Dublin relate to ensuring Built and Archaeological Heritage sites are safeguarded against the impacts of climate change.

Chief Executive's Recommendations

Additional text to be inserted in Energy & Building Section, as follows:

Local Authorities have a role in protecting and maintaining the archaeological and architectural resource for future generations. Climate change actions should be carried out in consultation with LA Architectural Conservation Officers, Heritage Officers and other relevant stakeholders. Proposals to improve the thermal performance of or insert renewable energy technologies into historic buildings need to be sensitive to traditional methods of construction to ensure that the proposed works are appropriate and do not actually cause damage to the structure, require the removal of historic fabric such as original windows, doors and floors, or have a detrimental visual impact.

National guidance is available to owners to direct appropriate interventions through the Department of Environment, Heritage and Local Government publication "*Advice Series: Energy Efficiency in Traditional Buildings*" (2010). South Dublin County Council will be mindful of this when carrying out works on any of its own historic building stock and seek to promote and develop best practice in this area.

Additional New Actions Awaiting Budget

Action: Develop maintenance and condition survey programmes for Council owned historic and ancient monuments that are informed by climate change impacts.

Action: Conduct research and seek to develop Council based case studies on appropriate and sensitive retro-fitting/energy upgrading of traditional buildings to inform works both to Council owned properties and to guide private owners.

SEA Comment

The above actions focus on cultural heritage in particular. By promoting consideration of these resources and adapting and considering climate change effects stronger protection of these resources are integrated to the SDCC CCAP. These are identified as generating positive direct interactions with

a number of SEOs including Cultural Heritage, Landscape and Climate Change as well as indirect positive effects on population and human health and material assets SEOs. No adverse environmental effects are identified for these CE recommended actions.

AA Comment

The above actions focus on cultural heritage, its protection and a sensitive approach to any sustainable energy upgrades to buildings of cultural heritage value. Its inclusions in the CCAP will not have the potential to result in land use effects that could result in likely significant effects to European Sites.

5.6.10 Submissions Regarding Energy Planning and Management: Monitoring of Targets

Many submissions were received by the other Dublin Local Authorities which sought the monitoring of Energy and GHG emissions included in the CCAP.

Chief Executive Response to Grouping: Energy Planning and Management: Monitoring of Targets

- (i) South Dublin County Council is on track to meet the public sector target of a 33% improvement in energy efficiency by 2020; this is an average improvement in energy efficiency of approximately 3% per year in the Council's own buildings and operations. This target is tracked through SEAI's monitoring and reporting (M&R) system. The M&R is a compliance tool to show the council how it is performing to achieve their targets. The Council currently uses the data from the M&R to develop the annual Energy Review.
- (ii) It is intended that the Energy Review will include a glide path illustrating the energy efficiency and GHG emission targets for the Council up to and including 2030. The Energy Masterplan will also inform this process going forward.
- (iii) The Council has an energy committee that works to ensure that existing energy reduction projects are monitored and that new projects are identified. The EC currently has an action plan that the committee track through the lifetime of the projects. Each project is currently listed in the Draft CCAP.
- (iv) The Council is also a signatory to the EU Covenant of Mayors for Climate and Energy initiative, which is a voluntary commitment by members to develop and implement Sustainable Energy and Climate Action Plans (SECAPs) and reduce their regions' greenhouse gases (GHGs) by 40% by 2030. SDCC will apply this target to its own operations but will also influence a reduction in GHGs throughout the County, through leading by example and working with key stakeholders and decision makers. This 40% reduction in greenhouse gas emissions by 2030 is just a target and does not limit SDCC to this target level. Appendix II of the Draft CCAP gives a baseline for total Emissions in South Dublin and this will be updated every two years in accordance with EU Covenant of Mayors for Climate & Energy protocol. This will address the submissions seeking better reporting and monitoring in the CCAP.
- (v) Action 1 of the Energy & Buildings Action Area of the Draft CCAP proposes to *"Create Energy Master Plan for the Dublin Region"*.

The Dublin Region Energy Masterplan will evaluate and outline the cost-optimal, spatially possible and technically feasible low-carbon scenarios for Dublin to meet its 2030 and 2050 CO₂ reduction targets from the perspective of society, energy consumers and the energy sector. These scenarios will present a set of clear, evidence-based pathways that will enable the Dublin Councils to create effective, long-term energy policy in areas such as spatial planning, land-use, and public infrastructure

The masterplan will address all energy sectors of electricity, heat and transport, and crucially will be modelled from a spatial perspective as well as from a technology perspective. Two baseline scenarios will first be established; the current situation, and the future '*business as usual*' situation which will model effects of current national level policy implementation to 2030 and 2050. From these, Codema will then establish the gap-to-targets and evaluate the possible local level low-carbon pathways to meet these targets, which will then be agreed upon by the Dublin Councils. The low-carbon potential of Dublin will be based on its unique spatial energy characteristics, which are often overlooked when examining low-carbon pathways at a national level. This project will be the first of its kind in Ireland and aligns with the objectives outlined in national level energy and climate change policy.

Codema are currently working on this Masterplan and part funding has been secured from the Sustainable Energy Authority of Ireland to complete it. The completion date is December 2020.

Table 5.6 Action Area: Energy and Buildings - Summary of amendments to actions and new actions

Energy and Buildings Action Number	Recommendation
1	No Change
2	No Change
3	No Change
4	No Change
5	No Change
6	No Change
7	No Change
8	No Change
9	No Change
10	No Change
11	No Change
12	No Change
13	No Change
14	No Change
15	No Change
16	No Change
17	No Change
18	No Change
19	No Change
20	The Council Energy Review (mid 2019) and going forward, will include a glide path illustrating the energy efficiency and GHG emission targets for the Council up to and including 2030.
21	Appendix II: Total Emissions in South Dublin of the CCAP, will also be updated every two years in accordance with EU Covenant of Mayors for Climate & Energy protocol.
22	South Dublin County Council is committed to participating with the RIAI in particular the Sustainability Task Force in seeking new and innovative approaches to Climate action in the built environment
23	Identify sites for trialling renewable energy projects, including solar PV and Geothermal.
24	The Council will investigate the Lifecycle Assessment of Traditional and New Construction Methods for Residential Projects in Dublin.
25	In all building projects, new build or retrofit, Swift Bricks or other nesting sites for swifts will be provided where practicable. The presence of swift breeding sites will be identified to ensure that known breeding sites are not lost as a result of construction work.
26	Develop maintenance and condition survey programmes for Council owned historic and ancient monuments that are informed by climate change impacts.
27	Conduct research and seek to develop Council based case studies on appropriate and sensitive retro-fitting/energy upgrading of traditional buildings to inform works both to Council owned properties and to guide private owners.

5.7 Actions on Transport

17 actions are outlined under the theme of Transport in South Dublin County Councils draft Climate Change Action Plan 2019-2024. A total of 58 items of submissions were received for attention to the main transport Chapter. The greatest number of submissions related to cycling infrastructure and cycle parking, the need to incorporate more segregated cycle lanes, and to improve the maintenance of the lanes, to improve enforcement around cycling and to provide more safe routes to school and training/education centres to encourage good cycling habits for children. 5 new actions were identified and 2 amended to clarify the action.

5.7.1 Submissions Regarding Road Infrastructure with unique identification number:

1. Please use alternative concrete and include reclaimed/recycled plastic in road building material (SDCC-CCAP-201902-31)
2. Public transport must be a huge consideration in all future developments. With so many new developments going up all over south county Dublin, and more large developments in the planning stage for Clonburris etc., traffic will be a huge issue. Traffic gridlock will add to emissions and be a major social issue. The transport infrastructure should be fit for purpose in any area in line with housing developments. (SDCC-CCAP-201902-31)

Chief Executive Response to Grouping: Road Infrastructure

South Dublin County Council will consider the use of reclaimed/recycled plastic and other alternate materials in the building of roads, footpaths and cycleways once approved, further research is required before local authorities, public bodies and contractors will use these materials for roads.

Actions 5 and 6 refer specifically to planning and public realm, and sustainable transport linkages. Action 14 refers to the delivery of public transport routes which will occur with the collaboration of the transportation bodies. Under the Planning and Development Act 2006 as amended and South Dublin County Council's own Development Plan, planning is required for schemes such as Clonburris. Clonburris was adjudicated under this legislation and changes were made as recommended in the Chief Executive Report and agreed by Council. This legislation includes for all effects of the development including the environment and transport.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.7.2 Submissions Regarding Modal Transport Shift:

1. To influence the transport sector to improve public transport substantially (SDCC-CCAP-201902-02)
2. Be ambitious, support car share schemes (SDCC-CCAP-201902-02)
3. Turn village centres to walking/cycling only throughways - give these areas back to the people and stop the car-centric thinking & designing norms (SDCC-CCAP-201902-11)
4. Transport accounts for 38% of the county's emissions. Setting aside the Council's own targeted actions, what else can be done in this realm to reduce emissions from non-Council activities? The bike related actions are welcome, and encouraging people walk where they can, or to use public transport instead of their car particularly the latter is vital. The Council could provide public information on energy efficient cars from best to worst to inform decisions relating to use and purchase.
Useful information could be sourced from the various legislation/guidance/ policies, extracted and provided to the public in a readily and easily digestible format (SDCC-CCAP-201902-20)
5. Allow left turn on red to reduce time cars stop at traffic lights. (Used in USA as right turn on red). Legislate for e-bikes/scooters and self-driving cars. Need to be done at a national level but SDCC can promote it. Self-driving cars would allow driveways to be reclaimed from cobblelock/concrete. Steal App from Boston Massachusetts <https://www.boston.gov/departments/new-urban-mechanics/street-bump> to identify potholes early and reduce damage to cars (SDCC-CCAP-201902-21)
6. There are no proposals for the promotion of cycling and walking as modes of transport. We note the reference to the National Cycle Policy Framework but are disappointed that there is no proposal to appoint a full-time Cycling Officer for the County as required by 17 (1) of the NCPF (SDCC-CCAP-201902-22)
7. Encourage active travel to schools. We recommend that the Council develop a programme to introduce safe routes for walking and cycling to every school in the County. The Council should review traffic movements and parking in the vicinity of each school and introduce restrictions on motor traffic and car parking to enable children to walk and cycle safely to school. We note that it is proposed to have organised walks to promote healthy lifestyles, i.e. Clondalkin Route. We suggest that this programme be expanded to include organised cycles. Consideration could also be given to organising walking and cycling "buses" to schools. (SDCC-CCAP-201902-22)
8. The DLAs should review and plan to foster and optimise the benefit of the emerging alternative personal transports such as battery-operated electric scooters / boards / cycles. This will require regulation, planning of paths / cycleways and possibly public charging points. These alternative methods of transport for the individual are here to stay – they must be safely catered for (SDCC-CCAP-201902-27)
9. Promote cycling and walking as a mode of transport. (SDCC-CCAP-201902-46)
10. Consult with Waterways Ireland about promoting the Grand Canal as a transport artery. (SDCC-CCAP-201902-46)
11. Develop a programme to introduce safe routes for walking and cycling to every school in the County (SDCC-CCAP-201902-46)
12. Review traffic movements and parking in the vicinity of each school and introduce restrictions on motor traffic and car parking to enable children to walk and cycle safely to school. (SDCC-CCAP-201902-46)
13. It is proposed to have organised walks to promote healthy lifestyles, i.e. Clondalkin Route. This programme could be expanded to include organised cycles. Consideration could also be given to organising walking and cycling "buses" to schools. (SDCC-CCAP-201902-46)

14. Introduce a new action to support the creation of Smart Mobility Hubs for Business or University Districts and Private Organizations to promote adoption of Carpooling and Vehicle Sharing based on a variety of greener EV vehicle types (not just cars but also vans, minibuses, bikes and scooters). (SDCC-CCAP-201902-54)
15. Introduce a new action to promote innovative car & vehicle sharing initiatives that go beyond traditional car clubs. These could be open peer-to-peer vehicle sharing marketplaces where mobility providers, organizations and private individuals can list their vehicles (cars, vans, bikes, scooters...) and share them with their local community. (SDCC-CCAP-201902-54)
16. Introduce a new action that promotes Mobility-as-a-Service initiatives. This would facilitate seamless travel plans across multi-modal transport options with integrated subscription plan or payment card. These transport options would include car and bike sharing, carpooling and other innovative shared mobility options in addition to public transport. 4. Introduce incentives for the use of innovative carpooling and shared vehicles initiatives (beyond existing car clubs). This is being done in several major cities in Europe and America and technology can be used to verify and enforce eligible use. (SDCC-CCAP-201902-54)

Chief Executive Response to Grouping: Modal Transport Shift

South Dublin County Council recognises the importance of high-quality public realm and it is our policy to rebalance movement priorities towards more sustainable modes of transportation by prioritising the development of walking and cycling facilities within a safe and traffic calmed street environment (Actions 7, 8, 9, 10, 11, 12 and 13 apply). Walking and cycling buses is part of the Green Schools Program.

The call for legislation for e bikes, e scooters etc is a matter for National Government. The Council acknowledges the submission on mobility hubs and other transport options/ initiatives for consideration.

The Council recognises the contribution of transport to CO₂ emissions and are working to encourage a shift to sustainable travel. Policies to better integrate land use and transportation, to discourage private commuting and to encourage active travel and public transport use have been embedded in our development plans since the early 2000s. We recognise the importance of working collaboratively with communities, employers, schools and other stakeholders to bring about positive changes in travel behaviour. Increasingly the quality of the public realm is being recognised as an important factor in encouraging active travel.

In order to create a more sustainable space, the County Development Plan, in accordance with national policy, places emphasis on the need for a modal shift from motorised private modes of transport towards public transport, cycling and walking. This requires improvements to both the current public transport network and to facilities for pedestrians and cyclists. The Council is working with the emerging strategy of the National Transport Authority and supplement it with supporting local improvements.

Sustainable forms of transport such as public transport, walking, and cycling are strongly promoted in the County Development Plan, which takes a pro-active approach to influencing travel behaviour and effective traffic management. These are seen as important elements of a progressive policy that can contribute to climate change mitigation and a more sustainable County. A crucial factor in the discussion of movement and transport is the challenge of tackling climate change. The Council shall use its powers to manage transport related spaces in the administrative area so as to reduce transport-related emissions in the area.

Achieving a reduction in pollution and greenhouse gas generation, so helping to mitigate climate change. Tackling these issues holistically so as to facilitate continued economic activity while reducing vehicular congestion and improving air quality, so having a positive impact on health. It is considered that modal shift measures are adequately addressed in the CCAP.

Chief Executive's Recommendation

It is recommended that the following new actions are included:

New Action: SDCC participates in the national Cycle Right programme bringing cycle training to pupils in primary and secondary schools throughout the County area. SDCC works closely with An Taisce Green Schools on the Green Travel theme and encourages increased cycling through support for cycle training, on site cycle parking and improvements to the physical environment identified by pupils. Cycle Training Programme for 6th Class students / Pedal Power Labs

New Action: SDCC will continue to seek new and expand on existing partnerships to encourage sustainable travel and safer travel behaviours.

New Action: SDCC will establish a portal dedicated to communication and promotion of active travel within existing platforms

SEA Comment

Positive interactions with SEOS identified for all the above actions, in particular with material assets, climate change, population and human health SEOs.

AA Comment

The inclusion of these actions will not in itself result in land use effects and will not have the potential to result in likely significant effects to European Sites.

New Action: SDCC will engage with local communities to develop a vision for the future of their neighbourhoods with a strong focus on local living, sustainable mobility and quality of life

SEA Comment

The above action supports engagement communication and collaboration and this is consistent with a number of SEOS including population and human health, climate change and material assets.

AA Comment

The inclusion of this action will not in itself result in land use effects and will not have the potential to result in likely significant effects to European Sites.

5.7.3 Submissions Regarding Electric Vehicles and Charge Points

1. Better Charging infrastructure for EV's (SDCC-CCAP-201902-02)
2. The lack of Electric car support in the county is very noticeable to electric vehicle drivers, there is less than 10 useable charger's online and some are frequently broken, and the council have no publicly accessible points anywhere, zero emissions cars and indeed bus's should be a priority for local bodies to significantly improve the local air quality and noise pollution issues, installation and maintenance of a paid for charging infrastructure on a large scale in all public car parks and spaces

could provide the council with an employment and revenue stream if handled correctly, the citizens of the county deserve clean air and support in making the switch to true battery only electric vehicles (SDCC-CCAP-201902-18)

3. Electric charging points for electric cars need to be ubiquitous. The plan to run points from lighting points is a great idea (SDCC-CCAP-201902-17)
4. Use of low emission vehicles for the Council's fleet and ask that Compressed Natural Gas (CNG) vehicles are included in the consideration in the replacement programme (SDCC-CCAP-201902-25)
5. Charge points for electric cars should be rolled out on a much more aggressive timeline - at the moment, it can be very difficult to find anywhere to charge an electric car outside of your own home. It's a disincentive towards owning an electric vehicle at a time when they should be incentivised. (SDCC-CCAP-201902-31)
6. Increase the number of charging points for electric vehicles. (SDCC-CCAP-201902-46)
7. More electric car charge points. (SDCC-CCAP-201902-67)

Chief Executive Response to Grouping: Electric Vehicles and Charge Points

The recent report of the Joint Committee on Climate Action "*Climate Change: A cross party consensus for Action*" makes a number of recommendations in relation to electric vehicle infrastructure. It is understood that measures related to the increased uptake of electric vehicles including charging infrastructure will be included in the All-of-Government climate action plan to be completed in 2019. The four Dublin Local Authorities and the Dublin Climate Action Regional Office (CARO) sit on the recently established Low Emission Vehicles, Working Group 3 chaired by the Department of Housing Planning and Local Government (DHPLG). Outputs from the national group will inform the roll out of EV charge points by LAs and other organisations across the country as well the planning, infrastructural and legislative issues that need to be taken into account in this roll out (Action 17 applies).

In the review of the South Dublin County Council County Development Plan 2016-2022 South Dublin County Council will examine the requirement to strengthen policies with regard to the promotion and facilitation of electric vehicles and introduction of standards for e-charging facilities.

The Council has started the transition of its own fleet to electric/ low emission vehicles and will continue this transition in its fleet as appropriate vehicles and technologies emerge on the market.

Action 2 shows the commitment of the Council to continue to replace Council fleet with more energy efficient alternatives including electric vehicles.

Chief Executive's Recommendation

It is recommended that the following new action is included in the transport section of the CCAP.

Action: **The Council will undertake an assessment of the number of existing and potential future Electric Vehicle Charge points in its jurisdiction.**

SEA Comment

This action relates to an assessment only and no landuse effects are identified. No interaction with Strategic Environmental Objectives currently and no significant environmental effects are identified for this CE recommendation.

AA Comment

The inclusion of this action will not in itself result in land use effects and will not have the potential to result in likely significant effects to European Sites.

5.7.4 Submissions Regarding Alternative Fuels and Emissions for Public Transport

1. For public transport vehicles (buses and rail mainly), Compressed Natural Gas (CNG) and hydrogen offers a decarbonisation solution for these vehicles and we ask for CNG and hydrogen to be supported to decarbonise the transport sector (SDCC-CCAP-201902-25)
2. Proposal that the Council supports the rollout of the CNG infrastructure and for further hydrogen trials to support heavy good vehicles and bus operators switch from diesel to cleaner alternative fuels (SDCC-CCAP-201902-25)
3. Transport emissions should be examined, for example, inclusion and examination of 38.9% of 1,877,910 tonnes of CO2 equivalent attributed to Transport in Mitigation Baseline section (SDCC-CCAP-201902-27)
4. All construction machinery using diesel be retrofitted to include diesel particle filters (DPF) (SDCC-CCAP-201902-28)
5. Reasonable fares or zero fares (like Luxembourg) ensures customers are not deterred. Fast service to connected routes. There are low carbon (biomethane) and zero carbon options for buses (Battery Electric & Hydrogen Electric). Zero emission is the future so invest in it once!
6. There is now a double decker hydrogen bus being manufactured in Ireland being sold globally (London, Europe, Asia). It produces only water and zero carbon emissions. (SDCC-CCAP-201902-40)
7. Target County emissions not just those of SDCC. Prioritise the areas and buildings with the highest emissions. Give more specific targets for emissions for the County (SDCC-CCAP-201902-46)
8. Open a dialogue with transport companies to provide a reduced fair on public transport from 7am to 9am and 4pm to 7pm. This would significantly reduce car dependent people traveling to the city from urban areas that are not close to LUAS and DART services areas (SDCC-CCAP-201902-46)
9. Expand the wording of Action 2 to include for the conversion of Council vehicles to CNG; "Ongoing replacement of Council vehicles with more energy-efficient alternatives, including EVs and CNG vehicles." (SDCC-CCAP-201902-62)
10. Expand the wording of Action 17 to include CNG refuelling stations. (SDCC-CCAP-201902-62)
11. A commitment to electrifying our rail lines through Lucan, Clondalkin and Hazelhatch. (SDCC-CCAP-201902-68)

Chief Executive Response to Grouping: Alternative Fuels and Emissions for Public Transport

The Council has no role or budget in the choice of technology for the public transport used in its jurisdiction. This role is mandated to the National Transport Authority (NTA) and funding provided by public bus fleets from central government through DTTAS. The government 's *Project Ireland 2040*¹ commits to ending the purchase of diesel-only buses from July 2019 for all our urban bus fleets.

The proposed NTA Bus Connects project states that full conversion of the bus fleet to low emission vehicles will be complete by 2030. A series of low-emission bus trials is under way in Dublin and Cork, funded through the DTTAS green public transport fund and with support from multiple agencies,

¹ <https://www.gov.ie/en/campaigns/09022006-project-ireland-2040/>

including the National Transport Authority, Dublin Bus and Bus Éireann. It is expected that the trials will conclude in April 2019. A final report will be produced which will further inform the best lower-emission option, or options, for services in the greater Dublin area and in the regional cities in the years ahead. In addition to this, a number of double-deck diesel-electric hybrid buses will shortly be delivered to Dublin Bus for a trial which will allow for a comparison of various manufacturers' offerings. Complementing those trials, the NTA will soon commence a tender process for the purchase of diesel-electric hybrid buses as part of 2020 bus purchase programme.² The Council has started the transition of its own fleet to electric / low emission vehicles and will continue this transition in its fleet as appropriate vehicles and technologies emerge on the market (Action 2 applies).

It is also noted that a recommendation from the report of the Joint Committee on Climate Action was that the NTA should investigate further the range of eco transport technologies that are currently in use, or under development, in other countries such as semi-hybrid solar buses in Norway with a view to identifying opportunities for adaptive retrofit and/or new vehicle introduction into public rolling stock replacements over the coming decade.

The Council is working closely with the NTA on the Bus Connects project to provide a better-quality bus and cycling infrastructure.

Chief Executive's Recommendation

It is recommended that amendments are made to:

Action 17: Expand availability of EV charging points and other facilities for non-fossil fuelled powered vehicles in the County

SEA Comment

This action relates to minor landuse effect. No significant environmental effects are identified for this CE recommendation and expansion of non-fossil fuel vehicles availability is consistent with SEOs around material assets, climate change and human health.

AA Comment

The inclusion of this action will not in itself result in significant land use effects and will not have the potential to result in likely significant effects to European Sites.

5.7.5 Submissions Regarding Cycle to Work Scheme & SDCC Staff Transportation

1. Additional measures are required to encourage staff to cycle to work. For example, the Council should provide: high-quality, secure, sheltered bicycle parking; showering, changing and locker facilities for cycling (and running/walking) staff; staff education in the personal health and social benefits of active travel (SDCC-CCAP-201902-22)
2. There is no mention in the draft action plan of the emissions expended by the transport systems used by SDCC staff in coming to work. It would be interesting to know what percentage of the staff employed by SDCC use the car as their means of getting to work. Often there really is no choice given the poor public transport system that exists in Dublin (two tramlines, no underground, one electrified suburban line) but yet it should be possible for SDCC to incentivize those who live with

² <https://www.kildarestreet.com/debates/?id=2019-02-12a.456&s=speaker%3A88>

5KM of their workplace to cycle and for those that live within 1KM to walk to work. (SDCC-CCAP-201902-28)

3. Encourage staff to cycle to work by providing high-quality, secure, sheltered bicycle parking; showering, changing and locker facilities for cycling (and running/walking) staff; staff education in the personal health and social benefits of active travel. (SDCC-CCAP-201902-46)

Chief Executive Response to Grouping: Cycle to Work Scheme & SDCC Staff Transportation

The Council's own Mobility Management Initiatives provides carpooling parking spaces for council staff in County Hall and encourages staff to engage in active travel such as walking and cycling to work by participating in innovative transport initiatives such as Smarter Travel Program, Car Free Day, Cycle2Work Day to name a few.

Staff are encouraged to take up the bike to work scheme as a tax allowance incentive and provides bicycle facilities for staff to use at its main offices. The Cycle to Work Scheme is a government funded tax incentive scheme which aims to encourage employees to cycle to and from work.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.7.6 Submissions Regarding Cycling and Active Travel

1. Support schools for active travel (SDCC-CCAP-201902-02)
2. Support sports clubs to encourage participants to travel by foot/bike – eg Lucan Scarsfields in too dangerous location to cycle (SDCC-CCAP-201902-02)
3. All council buildings should have secure parking for bicycles (SDCC-CCAP-201902-06)
4. Cycling infrastructure is currently wholly inadequate and disjointed - a major upgrade of all cycling is needed, with emphasis on segregated cycle paths. We are way behind most other European countries on this. I look forward to the Dodder valley cycle path to the city centre but we need a holistic complete county upgrade, including an increase to 20% of all transport budget on cycling & pedestrian infrastructure (SDCC-CCAP-201902-06)
5. Install kinetic footpaths: e.g. <http://kineticbikepathsfootpaths.weebly.com/how-it-works.html> (SDCC-CCAP-201902-11)
6. Cycling is likely to continue to increase as a means of commuting into the city in the future from suburban towns and from commuter areas. However, whilst it is referenced in the draft action plan, specific targets need to be included in the action plan. Otherwise, as with many action plans, it remains an aspiration rather than a means of holding the local authority to account for delivery of much needed safe, cycle ways. Cycling targets therefore need to be ambitious, clearly spelled out and with the local authority being held accountable.

Similar % of cyclists commuting to work/study as in Dutch or Danish cities, which are global leaders in cycling infrastructure: 41% used bikes to cycle to work/study in Copenhagen in 2017.

Coordinate traffic lights to favour cyclists.

Radically transform cycling infrastructure. As in Copenhagen, develop cycle super highways to all major suburban towns and which should be prioritised over all other transport methods. For example, super highways in Copenhagen lead cyclists in and out of the city from as far as 15 kilometres away. Not a quick solution, but would assist with traffic congestion, individuals' health, and road safety in the long run.

Increase number of secure bike parking facilities in city as cycling uptake expands. Have infrastructure ready rather than responding to it when bike parking facilities have reached capacity. Dutch/Danish parking facilities are excellent examples of this.

Expand JustEat Dublin Bike (DB) scheme to SDCC areas which are commutable by bike to city centre and make it free for users of these bikes as in Copenhagen.

Pilot electric bikes (with GPS for tourists) as an option within DB scheme to encourage greater uptake.

Make commitment to achieve UCI Bike City status by 2030 in collaboration with other Dublin local authorities, (measures the use of bikes as a leisure activity and means of transport and awards designation to cities which do so). Makes Dublin local authorities accountable to meeting other cycling targets above also (This submission was sent directly to SDCC as well as DCC) (SDCC-CCAP-201902-12)

7. In terms of encouraging cycling as a means of commuting, there needs to be a portion of road set aside for cyclist all across south Dublin. These paths can be part of the road itself or part of the footpath. From personal experience it should be the road however as the parts of the footpaths that are allocated to cyclists are often poorly maintained and of low quality. In the short term simply painting a portion of the road for cyclists would be of low cost compared to the cost of physical works and give more confidence to the many people I have spoken to who are willing to cycle but too concerned and afraid of their safety to take the leap from car to bicycle (SDCC-CCAP-201902-17)
8. The inclusion of cycle tracks in roads maintenance programme (SDCC-CCAP-201902-22)
9. We advocate massive investment in provision of cycle lanes physically separated from the road through shared pedestrian-cycle paths as found routinely in Germany, an increase in free cycle parking to extend to all car parks on the model of the Drury Street Car Park, measures to be taken to address cycle theft, greater toll reductions for electric vehicles, an increase in the electric vehicle charge point network, introduce “stand to the right” signage on all moving walkways and escalators to improve flow. (SDCC-CCAP-201902-30)
10. Please provide proper segregated cycle tracks to enable cycling for all ages and abilities as a priority (<http://cyclingforall.ie/>). Improve walking infrastructure also. SDCC should seek the public to help them to run a campaign to audit existing walking and cycling infrastructure to draw up lists of both local improvements required as well as newer larger improvement/enabling projects. Cycling and walking infrastructure projects should start at primary schools - audit every primary school in the county, identify the main access routes to the schools and prioritise/ provide segregated protected cycle tracks to the schools. Follow on with secondary schools, colleges, etc. Promote the use and implementation of electric bikes, e-scooters, mobility mobiles and e-cargo bikes for deliveries. (SDCC-CCAP-201902-39)
11. Develop safe and segregated cycle paths on all major routes into the city (SDCC-CCAP-201902-55)
12. Appoint a full-time Cycling Officer for the County as required by 17 (1) of the National Cycling Policy Framework (NCPF) (SDCC-CCAP-201902-46)

13. Promote cycling and walking. Create short cuts via laneways and creating openings between adjacent estates. Allow cycling in parks by marking out cycling strips on paths. (SDCC-CCAP-201902-49)
14. To make public transport move more effectively and making it faster than private cars it would be an idea to severely restrict car parking on roads, cycling lanes and paths. (SDCC-CCAP-201902-49)
15. Develop safe and segregated cycle paths on all major routes into the city. (SDCC-CCAP-201902-55)
16. We welcome the initiatives to encourage walking, cycling and increased use of public transport over private (fossil fuel based) vehicular transport. (SDCC-CCAP-201902-42)
17. Promote a project for all schools to plot how long it takes to walk or cycle to school from each child's home street, collate the results into a map with circular zones of 5 minute walks, 10 minute walk or cycle, 15 minute walk or cycle etc. and publish this on their website for all pupils and parents to see, as a way to encourage walking and cycling to school, this can be mirrored for businesses. (SDCC-CCAP-201902-57)
18. Develop appropriately located park and ride facilities to make optimal use of existing and future public transport. (SDCC-CCAP-201902-67)
19. Transform our canals' towpath's into cycle and pedestrian greenways. (SDCC-CCAP-201902-68)

Chief Executive Response to Grouping: Cycling and Active Travel

Many actions specifically respond to the received submissions in this grouping, actions 7, 8, 9, 10, 11, 12, 13.

The Council recognises the contribution of transport to CO₂ emissions and is working to encourage a shift to sustainable travel. Policies to better integrate land use and transportation, to discourage private commuting and to encourage active travel and public transport use have been embedded in our development plans since the early 2000s. We recognise the importance of working collaboratively with communities, employers, schools and other stakeholders to bring about positive changes in travel behaviour. Increasingly the quality of the public realm is being recognised as an important factor in encouraging active travel.

In order to create a more sustainable county, the County Development Plan, in accordance with national policy, places emphasis on the need for a modal shift from motorised private modes of transport towards public transport, cycling and walking. This requires improvements to both the current public transport network and to facilities for pedestrians and cyclists. The Council is working with the emerging strategy of the National Transport Authority and supplement it with supporting local improvements.

Sustainable forms of transport such as public transport, walking, and cycling are strongly promoted in the County Development Plan, which takes a pro-active approach to influencing travel behaviour and effective traffic management. These are seen as important elements of a progressive policy that can contribute to climate change mitigation and a more sustainable County. A crucial factor in the discussion of movement and transport is the challenge of tackling climate change. The Council shall use its powers to manage transport related spaces in the administrative area so as to reduce transport-related emissions in the area.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

Table 5.7 Action Area: Transport - Summary of amendments to actions and new actions

Transport	Recommendation
1	No Change
2	No Change
3	No Change
4	No Change
5	No Change
6	No Change
7	No Change
8	No Change
9	No Change
10	No Change
11	No Change
12	No Change
13	No Change
14	No Change
15	No Change
16	No Change
17	Expand availability of EV charging points and other facilities for non fossil fuelled powered vehicles in the County
18	The Council will undertake an assessment of the number of existing and potential future Electric Vehicle Charge points in its jurisdiction
19	SDCC participates in the national Cycle Right programme bringing cycle training to pupils in primary and secondary schools throughout the County area. SDCC works closely with An Taisce Green Schools on the Green Travel theme and encourages increased cycling through support for cycle training, on site cycle parking and improvements to the physical environment identified by pupils. Cycle Training Programme for 6th Class students / Pedal Power Labs
20	SDCC will continue to seek new and expand on existing partnerships to encourage sustainable travel and safer travel behaviours
21	SDCC will establish a portal dedicated to communication and promotion of active travel within existing platforms
22	SDCC will engage with local communities to develop a vision for the future of their neighbourhoods with a strong focus on local living, sustainable mobility and quality of life

5.8 Action 3 Flood Resilience

22 actions are outlined under the theme of Flood Resilience in South Dublin County Councils draft Climate Change Action Plan 2019-2024. A total of 13 items of submissions were received for attention to the main Flood Resilience Chapter. The greatest number of submissions related to flooding and flood related issues, there were also submissions on Sustainable Urban Drainage and Surface Water Quality. 4 amendments were identified.

5.8.1 Submissions Regarding Flooding and Flood related issues

1. Use public lands, including parks, to allow them to mitigate future flooding events. See Culmore ecological play park, in Derry as an example. Also, Denmark have some examples here: <https://www.citylab.com/design/2016/01/copenhagen-parksponds-climate-change-community-engagement/426618/> (SDCC-CCAP-201902-11)
2. The RIAI is delighted to see that nature-based solutions are Dublin City Council preferred response to flood defence. Town planners, Engineers, urban designers, ecologists, and heritage and conservation officers should ALL be involved from the outset in developing flood prevention plans. Furthermore, Dublin City Council's adaptation strategy should not have a huge impact on climate emissions and flood defence carbon footprint should always be assessed. (This submission was sent directly to SDCC as well as DCC) (SDCC-CCAP-201902-27)
3. Much is made of flooding in the SDCC area, but have you assessed the possibilities of landslides in the Dublin Mountain areas? I didn't see any mention of these. More intense storms are predicted and this in turn could lead to landslide conditions in some areas. (SDCC-CCAP-201902-24)
4. Review natural flood management to incorporate the recommendations of Anja Murray in her report to Friends of the Earth. Natural Flood Management; Adopting ecosystems approaches to managing flood risk. (SDCC-CCAP-201902-46)
5. Adopt better use of gully machines which will alleviate urban flooding in residential areas. (SDCC-CCAP-201902-46)
6. The various flood defence / alleviation schemes referred to should ensure that the relevant mitigation measures in the Eastern CFRAMS Flood Risk Management Plans are effectively implemented and monitored during the construction of the project lifecycle. (SDCC-CCAP-201902-42)

Chief Executive Response to Grouping: Flooding and Flood related issues

The Chief Executive acknowledges the submissions in relation to flooding and associated issues. South Dublin County Council is currently engaged on a number of Flood Alleviation Schemes working with the OPW and neighbouring Local Authorities. These schemes are using our public parks where possible to attenuate water in a natural way, and nature based solutions are used where possible, grey engineering solution are used where there is no natural solution. More information on this scheme can be found at <http://www.poddlefas.ie/> . Action number 6 under the Flood Resilience action area covers the implementation and demonstration of SuDS guidelines in SDCC buildings, Strategic Development Zones (SDZ's) and Local Area Plans (LAPs). Pluvial flooding will also be assessed, and on-going maintenance of the drainage infrastructure is and action of the CCAP.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.8.2 Submission Regarding the Role of Individual Homeowners Undertaking SuDS Measures

1. Open a dialogue with Residents Associations about tree planting, open spaces, grass verges and back gardens in relation to flood resilience. (SDCC-CCAP-201902-46)

Chief Executive Response to Grouping: Role of Individual Homeowners Undertaking SuDS Measures

The Chief Executive acknowledges the submission in relation to how individual citizens could and should implement their own SuDS measures within the footprint of their homes and especially in those cases where their home is upstream of a flood zone. All new developments are being encouraged to use green infrastructure and store significant amounts of rainfall; however it is not the mandate of the CCAP to have private house owners implement SuDS at their properties. SuDS measures are adequately addressed in the CCAP. Action 22 of the Flood Resilience section will *Promote and encourage community involvement in the retrofit of SuDs in existing developments.*

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.8.3 Submission Regarding the replacement of car parking areas with permeable surfaces

1. In relation to managing "urban creep" and the increase in impermeable surfaces, I would suggest a need to increase public awareness of the value of householders leaving (where possible) some area around their driveway permeable to water. A similar awareness raising exercise should be carried out with developers and the business/office community. (SDCC-CCAP-201902-26)

Chief Executive's Response

The Chief Executive acknowledges the submissions in relation to the replacement of car parking areas with permeable surfaces. Action number 15 under the Flood Resilience action area covers the establishment of a working group to deal with the issue of pluvial flood risk. This shall include:

- How to manage “urban creep” and the increase in impermeable surfaces
- Promotion of SuDS early in design process
- Development of pluvial flood forecasting through use of point rainfall forecasting

The standards and provision of car parking spaces is a function of the County Development Plan and as such is not within the remit of the Draft CCAP.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.8.4 Submissions Regarding Surface Water Quality

1. If a river originates in a Natura 2000 site then that river requires greater protection as an ecological corridor and should be treated as such, under planning practices and the SDCC Development Plan. The SDCC Development Plan does not even identify any of these rivers or their tributaries. (SDCC-CCAP-201902-47)
2. Many of our rivers are impacted by sewerage spillage during heavy rainfall. There is a huge issue of legacy dumping that has never been dealt with e.g. along the Owendoher River (election posters some 30 years old been recently located). (SDCC-CCAP-201902-47)
3. SDCC has no crew whose job is to do regular clean-ups of rivers – Public Realm has in sufficient resources to tackle riverbank clean-ups. (SDCC-CCAP-201902-47)
4. Place purifying stations in key areas. (SDCC-CCAP-201902-46)

Chief Executive Response to Grouping: Surface Water Quality

The Chief Executive acknowledges the submissions in relation to the quality of surface waters. Action item 10 & 11 aim to protect and clean our surface waters and South Dublin County Council is actively working with other agencies particularly Local Authority Waters Programme (LAWPRO) in relation to delivering the objectives of the River Basin Management Plan 2018-2021. South Dublin County Council also works with voluntary groups and tidy town in the clean-up of river banks by way of grant and the SDCC social credit scheme.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment:

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.8.5 Submission Regarding Irish Water

1. Many of our rivers are impacted by sewerage spillage during heavy rainfall.

Chief Executive Response to Grouping: Irish Water

A submission notes that Irish Water has an impact on rivers and is absent from the list of stakeholders in the plan. Given that Irish Water are a stakeholder in the work of the Council, new text is proposed.

Chief Executive's Recommendation

It is recommended that the following amendment be made to the Draft CCAP as follows:

Under Flood Risk Management –the following text shall be added:

The Council is working with a range of stakeholders including Irish Water in the management of pluvial flooding across the local authority area.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.8.6 Regional Submissions on GIS Risk Map

A submission makes reference to the publication of all data that would be contained within any GIS risk map. One of the actions of the CCAP is to 'develop a climate change impact GIS risk map with scenarios for the Dublin Region'. The data layers for this work is generally in the public domain (floodmaps.ie and Irelands Open Data Portal). The publication of any data will be in accordance with local authority policies.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment:

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.8.7 Regional Submissions Regarding Flood Resilience and Energy Efficiency

A submission was received that recommended that all flood resilient measures be developed in an energy-efficient manner. The Council are committed to implementing measures as energy efficient as possible, in line with best practice technologies. The Draft CCAP sets out how the council will meet the following specific climate change targets:

- A 33% improvement in the Council's energy efficiency by 2020; and
- A 40% reduction in the Council's greenhouse gas emissions by 2030.

In Ireland, the public sector has mandatory energy efficiency targets. It is set in the context of Ireland's EU and national commitments and wider climate change goals, whereby a target of 33% energy efficiency improvement is to be achieved by all Irish public bodies (as defined in Statutory Instrument 426 of 2014) by 2020. Public bodies are required to report annual energy efficiency data to the Sustainable Energy Authority of Ireland (SEAI) which manages the reporting process on behalf of the Department of Communications, Climate Action and Environment (DCCAE). There is currently no statutory requirement to undertake sectoral mitigation plans, including revised sectoral, local authority emissions reductions targets.

Being a signatory to the EU Covenant of Mayors for Climate & Energy, the Council has voluntarily committed to a 40% reduction in the Council's greenhouse gas emissions by 2030. Across Europe, signatory cities pledge action to support implementation of the EU 40% greenhouse gas-reduction target by 2030 and the adoption of a joint approach to tackling mitigation and adaptation to climate change.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.8.8 Regional Submission Monitoring of SuDS

A submission was received recommending that the application of SuDS as part of flood risk management actions be supported by relevant monitoring and maintenance to ensure their effective operation over the lifetime of the Plan. This is standard procedure within local authorities.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

Table 5.8 Action Area: Flood Resilience - Summary of amendments to actions and new actions

Flood Resilience	Recommendation
1	No Change
2	No Change
3	No Change
4	No Change
5	No Change
6	No Change
7	No Change
8	No Change
9	No Change
10	No Change
11	No Change
12	No Change
13	Develop template to capture impacts, response and costs (including ecosystem services/natural capital costs) for all major climate events
14	No Change
15	Update DLA urban drainage and flooding policies for current knowledge of flood risk and the latest best practice in drainage design promoting natural flood measures as a priority
16	No Change
17	No Change
18	No Change
19	No Change
20	Minor flood schemes and general maintenance that are designed and implemented to promote nature based solutions where practical
21	Communication and awareness campaigns on flood risk management and natural flood management measures
22	No Change

5.9 Actions on Nature-Based Solutions

Nature based solutions are critical in climate change adaptation. There were 44 submission items received in relation to Nature Based Solutions. There were no new actions and 1 new amendment as a result of these submissions. The submissions can be broadly summarised under the following headings.

5.9.1 Submissions Regarding Trees

1. Tree planting should be in excess of the number of trees felled to increase the tree canopy of street trees. (SDCC-CCAP-201902-09)
2. A public consultation should be made as to tree removal or pruning, just as for any public works. (SDCC-CCAP-201902-09)
3. I think there needs to be a moratorium on cutting all trees in the city and a drive to plant thousands more trees, trees support a huge variety of wild life and are carbon sinks and are also very good for humans, bringing peace. (SDCC-CCAP-201902-10)
4. Can you expand forestry and replant existing to native woodlands? Perhaps work with DAFM, Coillte within your DMP board membership. (SDCC-CCAP-201902-11)
5. Can you include expansion of fruit & nut trees into tree management policy? Aside from all of the obvious tree benefits, they provide food for biodiversity & humans alike, are low maintenance and often suitable for riparian locations, to aid with flood mitigation and riverbank retention. (SDCC-CCAP-201902-11)
6. Plant a new tree for every resident in SDCC over this Climate Action term. (SDCC-CCAP-201902-11)
7. Surprising to see that amongst the actions tree planting was not there. SDCC-CCAP-201902-13
8. Urban reforestation, changing public perception of urban nature, changing our environment. Planning for the future. (SDCC-CCAP-201902-17)
9. Trees are a key component and known carbon sink. The actions in this section are heavily resilience oriented. (SDCC-CCAP-201902-20)
10. It is also interesting to read on page 73 that SDCC has a deficit of trees. Action point 14 states that there will be a % increase in tree canopy cover. (SDCC-CCAP-201902-28)
11. Trees for climate change 'Crann – trees for Ireland' advocates the following and calls for the support and action of your council...(SDCC-CCAP-201902-29)
12. The easy treesie – Crann, Trees for Ireland project has pleasure in submitting the following remarks to the climate change action consultation...(SDCC-CCAP-201902-30)
13. Tree planting should be prioritised. Native trees and plants should be prioritised. Pollinator-friendly trees and plants should be used as far as possible and practicable. General public should be involved. Establish an education / support centre to show the public what SDCC is doing and what actions the public can take to improve the environment using natural practices / products. (SDCC-CCAP-201902-32)
14. Include as a priority the provision/planting of trees across the County with reduced cost trees available for households to plant and map. This will assist, flood alleviation as well as increasing biodiversity throughout the County. Some waste companies are not processing their waste appropriately. Increased inspections by SDCC to ensure compliance could help to resolve this issue. (SDCC-CCAP-201902-46)
15. Is there a tree canopy mapping project – app for example. (SDCC-CCAP-201902-47)

16. The 'Living With Trees' Project is a success thanks to Mary Keenan and her team but the net planting figures are low due to a lack of resources. Six thousand trees as a net figure is a very low figure. What percentage of this number were fruit trees? (SDCC-CCAP-201902-47)
17. The Wicklow Mountains National Park requires a buffer zone between itself and the ever increasing built urban & city environment. It is remarkable that a section of this National Park lies within SDCC local authority area. It warrants SDCC to develop a buffer zone of protection. Why can't SDCC plant a million trees as part of this buffer zone of protection (similar to the Millennium Tree Project). (SDCC-CCAP-201902-47)

Chief Executive Response to Grouping: Trees

Submissions relate to the role of afforestation in enhancing resilience to climate change. The Council recognises that increased tree planting can contribute to the development of carbon sinks in the County, which can contribute to the impact of greenhouse gas emissions. Afforestation policy in Ireland, is under the jurisdiction of stakeholders including Department of Agriculture, Food and the Marine, Collite etc. and includes initiatives such as the Afforestation Scheme.

The Council will continue to implement tree planting programmes across the County in line with its tree management policy adopted in 2015 *Living with Trees: South Dublin County Councils Tree Management Policy 2015-2020*. This tree management strategy guides the management and maintenance of trees in public ownership across the county, in accordance with best practice to ensure a healthy and sustainable tree population for current and future generations.

Native trees are part of the County Tree Strategy but limiting to just native plants may not provide enough for biodiversity or visual interest. Many non-native plants are providing important sources of food for pollinators in the County.

Chief Executive's Recommendation:

It is recommended that the following action is amended:

Action 22: Include native species into local authority plans ~~where appropriate~~ as a key nature-based measure where appropriate

SEA Comment and AA Comment

The above actions were assessed during draft plan preparation and were recommended for mitigation to enhance environmental performance.

5.9.2 Submissions on Pollination

1. I am writing to stress that you place an emphasis on restoring balance to the web of life in Dublin City and beyond. Our insects and bees are under threat and I suggest that you take Holland's lead, and ban all pesticides in the city, and build insect hotels to support our insect and bee population. (SDCC-CCAP-201902-10)
2. Eliminate all chemical Pesticides & Herbicides. Apply all of the pollinator.ie recommendations. (SDCC-CCAP-201902-11)
3. Without bees and other wildlife creatures, many of our plants cannot function properly. SDCC should allocate resources and invite the public to spend their own private funds on specially allocated areas to build beehives, bat boxes/houses. (SDCC-CCAP-201902-17)

4. The all Ireland pollinator plan has very clear and practical guidelines with regard to the best practices for supporting pollinators. This includes not mowing grassy areas until mid to late April and then sticking to a 6 week mowing schedule. Public grassy areas have been widely mown in mid March 2019. Local councils should be aware of the recommendations and adhere to them as much as possible. An effort to raise awareness among the general public as to why this is happening should also be made. (SDCC-CCAP-201902-31)
5. Incentives to encourage green roof buildings / bee keeping. (SDCC-CCAP-201902-32)
6. Reduce grass cutting to promote wildlife biodiversity and encourage public education and awareness of this policy through public notices and signage. Eliminate use of chemical sprays to control weeds as per national pollinator plan. Use natural sprays and publicise change in policy on council vehicles/staff clothing. Organise biodiversity walking tours for the general public. The above proposals should be discussed and implemented when agreed in consultation with community groups such as Tidy Towns. (SDCC-CCAP-201902-35)
7. End practices that are harmful to biodiversity. Stop wholesale cutting of green areas. Areas of grass need to be left grow to support pollinator species. Plant native pollinators to aid biodiversity. Ban the planting of single species hedges. Stop cutting down mature trees rather than appropriately pruning them. Existing trees should be safely maintained by tree surgeons or appropriately trained council staff. Increase hedge/hedgerow size to a minimum of 3m to aid wildlife. Enshrine nature restoration as a key target. The Draft Climate Action Plan identifies nature restoration and tree planting as vital mitigation and adaptation solutions. Allowing grass and wildflowers to grow, planting trees and shrubs, regenerating wetlands and so on are the best defence we have against the rising CO2 levels causing climate change. Biodiversity Ireland reports 20% of species are under threat of extinction in Ireland including the bumblebee. Nature restoration is vital to maintain Irish biodiversity, save essential pollinator species and to remove CO2 from the air to balance emissions we will be unable to reduce. Nature restoration is important enough to be its own separate key target. The restoration and regeneration of nature should be a key target of the Climate Action Plan. The Draft Climate Action Plan identifies the prevention of habitat loss (p71) as an essential activity. However, realistically we will continue to build new housing and the council continues to cut down mature trees. If we continue to simply strive to “protect” habitat we will continue to lose it. It is essential that we *create* new habitat within our urban environment. There are single lines of hedging along roadways and boundary fences throughout South Dublin. The National parks and wildlife service identify hedges as being of exceptional importance to Irish biodiversity. Planting a second line of native hedge shrubs alongside existing hedge would transform these currently useless hedges into a haven for Irish biodiversity and help protect Irish food security as we head into an uncertain future. Furthermore, there are isolated lines of broken hedgerow in greenfield sites throughout South Dublin. This hedgerow is often incorrectly maintained too low to be of any use to biodiversity. To create new habitat and ecological corridors we propose: identifying hedgerow and lines of hedging along roads and fences. Ensuring this hedging is maintained at a height of at least 2.5m. A programme of tree and shrub planting to increase the number of native trees in the County. (SDCC-CCAP-201902-38)
8. Action 24 pg76 Incorporate actions from national pollinator plan into Green Infrastructure. Strategy Pg 71 Actions to support pollinators, reference as legislation. Action 25 pg76 Support and promote National Biodiversity Data Centre All – Ireland Pollinator Plan Actions for Councils. Reference relevant legislation policies/ guidance. No pollinator icon. Attachments; Pollinator – Council –Guide- final and Council Framework AIPP 19.3.19. (SDCC-CCAP-201902-41)

Chief Executive Response to Grouping: Pollination

SDCC has taken a leading role to support pollinators on public land. In order to inform our citizens on the work being undertaken the Council works closely with local community groups. Actions in the national pollinator plan are implemented on private developments in the County by means of planning reviews carried out by SDCC.

SDCC are currently trialling alternative maintenance regimes to allow for five-week cuts of grass areas as opposed to two-week to encourage pollination. This requires raising public awareness and public acceptance of this form of maintenance and the trade off with perceived aesthetics. In addition to this SDCC is also trialling wild flower mixes in selected areas of the County. Mulching and careful plant selection are other pollination methods currently adopted.

As a leader in pollination the Council are currently creating a pollinator garden outside County Hall for the public and any interested community groups to view.

The Council has a policy in place to reduce usage of chemical controls, including avoidance of spraying near play areas and other sensitive zones. Glyphosate is being replaced and is used only in accordance with the approvals from central government. South Dublin County Council does not permit run-off into rivers and streams. Staff are trained in careful use in accordance with the Regulations, dosage and environmental protection requirements.

Chief Executive's Recommendation:

It is recommended that no amendments be made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.9.3 Submissions Regarding Biodiversity and protected Species

1. The national biodiversity plans needs to be activated. And in my opinion it can no longer be business as usual, what is important is restoring the natural balance to this land and protecting our plant and wild life. (SDCC-CCAP-201902-10)
2. Reduce grass cutting to promote wildlife biodiversity and encourage public education and awareness of this policy through public notices and signage. Eliminate use of chemical sprays to control weeds as per national pollinator plan. Use natural sprays and publicise change in policy on council vehicles/staff clothing. Organise biodiversity walking tours for the general public. The above proposals should be discussed and implemented when agreed in consultation with community groups such as Tidy Towns. (SDCC-CCAP-201902-35)
3. We are a small group. We want to bring to your attention a local site which we refer to as the wild woodland habitat between the villages of Rathcoole and Saggart. We ask that this habitat be preserved and protected as it contributes to climate change mitigation. This Wild Woodland is within an area of approx. 12 ha. It is made up of willow/birch scrub which is a great example of

natural succession. It is adjacent to Rathcoole Park, Rathcoole Village and agricultural land. The Woodland comprises small meadow areas, hawthorn hedge-rows, blackthorn, wild rose, and other wild plants and flowers. It is inhabited by many birds and mammals. Notably, it has a stream and temporary springs. This area has multiple resource potential for the community as an amenity and for improving the health for our community. It already contains trails and desire lines as people use it for recreation and as a direct route between Rathcoole and Saggart. Already it supports much wildlife and acts as a wildlife corridor. We want to highlight the value of the site in terms of building biodiversity and quantifying its Woodland value in mitigating local flooding and climate change. It is subject to a planning application for housing with SDCC currently. We request that the integrity of the site be protected. We see great potential for many of the features to be kept intact, by establishing nature driven development. We ask that forthcoming developments would be integrated into a plan which seeks to enhance key green spaces for community enjoyment and education. For us and our community, contact with nature improves our mental and physical health, reduces stress, lifts our mood and increases our recovery from illness and disease. (Barton, Charles Lewis.) These Woodland trees, hedgerows, wildflowers and waterways are providing vital habitats and food sources' for our wildlife and pollinators. Locally this allows birds, frogs, mammals, and insects like bees and butterflies to thrive. These spaces also act as safe travel corridors for a wide range of different animals, linking areas. Wild spaces made up of trees absorb water and help reduce local flooding. As living things they take in and store carbon, helping against climate change. Woodlands release oxygen. We expect that this submission will be given serious consideration and subsequent actions to help our community secure this wooded landscape as a resource for the future. (SDCC-CCAP-201902-36)

4. End practices that are harmful to biodiversity. Stop wholesale cutting of green areas. Areas of grass need to be left grow to support pollinator species. Plant native pollinators to aid biodiversity. Ban the planting of single species hedges. Stop cutting down mature trees rather than appropriately pruning them. Existing trees should be safely maintained by tree surgeons or appropriately trained council staff. Increase hedge/hedgerow size to a minimum of 3m to aid wildlife. Enshrine nature restoration as a key target. The Draft Climate Action Plan identifies nature restoration and tree planting as vital mitigation and adaptation solutions. Allowing grass and wildflowers to grow, planting trees and shrubs, regenerating wetlands and so on are the best defence we have against the rising CO2 levels causing climate change. Biodiversity Ireland reports 20% of species are under threat of extinction in Ireland including the bumblebee. Nature restoration is vital to maintain Irish biodiversity, save essential pollinator species and to remove CO2 from the air to balance emissions we will be unable to reduce. Nature restoration is important enough to be its own separate key target. The restoration and regeneration of nature should be a key target of the Climate Action Plan. The Draft Climate Action Plan identifies the prevention of habitat loss (p71) as an essential activity. However, realistically we will continue to build new housing and the council continues to cut down mature trees. If we continue to simply strive to "protect" habitat we will continue to lose it. It is essential that we *create* new habitat within our urban environment. There are single lines of hedging along roadways and boundary fences throughout South Dublin. The National parks and wildlife service identify hedges as being of exceptional importance to Irish biodiversity. Planting a second line of native hedge shrubs alongside existing hedge would transform these currently useless hedges into a haven for Irish biodiversity and help protect Irish food security as we head into an uncertain future. Furthermore, there are isolated lines of broken hedgerow in greenfield sites throughout South Dublin. This hedgerow is often incorrectly maintained too low to be of any use to biodiversity. To

create new habitat and ecological corridors we propose: identifying hedgerow and lines of hedging along roads and fences. Ensuring this hedging is maintained at a height of at least 2.5m. A programme of tree and shrub planting to increase the number of native trees in the County. (SDCC-CCAP-201902-38)

5. Engage with residents and environment groups re Biodiversity urgently. SDCC should engage a full time Biodiversity Officer immediately along with a team of Biodiversity Coordinators in each electoral ward so that the nature based solutions of the plan can be implemented. Unlike other LAs there is no designated Biodiversity Officer to refer queries or projects to. For example DCC have an assigned role that balances the Tidy Town efforts of the various groups (e.g promoting natural linkages/ecological corridors, hedgerow mapping, non existent tree canopy mapping etc). Some concerns were raised about how the biodiversity aspects of a submission can be meaningfully assessed in the absence of a Biodiversity Officer. The Environmental awareness section of SDCC could be more visible and active in the community particularly with residents associations and tidy towns groups. SDCC should ensure that they have the correct equipment for cutting wild flower meadows. Using incorrect equipment is damaging and counterproductive. All community grants for environmental initiatives should be proofed for consistency with The *All Ireland Pollinator Plan* and approved by the Biodiversity Officer. The DCCAP can reference the *All Ireland -Pollinator Plan* with a commitment to implement the actions set out in the guideline document '*How Councils can support the Pollinator Plan*'. SDCC could make available flower bulbs for their '*bulbs not bonfires*' scheme, and increase the quantities of those bulbs for organised groups (e.g.Tidy Towns). This could be a first step in correlating the SDC Climate Change Action plan with the *All Ireland -Pollinator Plan*. Develop wildflower meadows in all parks. Engage young people with the plan and increase their participation by developing a pilot project with transition year students. Students can learn about parks and gain knowledge and possibly work experience in the role of a Park Ranger. Urgently assess wildlife corridors and fill in gaps (e.g. green roofs). Expand tree thinning beyond just street trees. (*How else can trees be increased?*). Identify areas (outside of parks and urban areas) that have both flood and climate mitigation capabilities. Support Green Schools to maintain their Green Flag. Schools should be inspected each year to ensure standards are adhered to. Prepare an invasive species plan. There are more invasive species than Japanese Knotweed (e.g. Mink kill ducks and birds etc.). If rivers start in a Natura 2000 area they should be treated with all the EV appropriate protections under the Habitats Directory. Prepare riparian vegetation policies which will aid biodiversity, river health & fisheries and flood alleviation. The policies will protect, maintain and improve these systems. (SDCC-CCAP-201902-46)
6. SDCC has for a long period of time not invested in Biodiversity and the Public Realm functions in comparison to other Dublin local authorities – this needs to change dramatically. We have been highlighting the lack of a full-time Biodiversity Officer and a lack of a Biodiversity Plan operational within this local authority since 2006. There is no budget specifically set aside for promoting and protecting Biodiversity. With no baseline biodiversity data in place for the references purposes valuable opportunities to retain and protect local biodiversity. A greater effort to establish baseline data needs to be put in place e.g. a county wide bat survey and ecological assessments of our rivers etc. Natural Linkages have disappeared in worrying quantities due to development pressures & poor planning decisions with little regard for the impact on the wider County System of Natural Linkages. The issue of these fragmented natural linkages needs to be prioritised by SDCC and replanting or 'plugging the gaps' initiated. Is there a County Wide Natural Linkage Map

for SDCC? There are no gardeners employed in SDCC unlike other local authorities so how are they going to introduce the National Pollinator Plan in their public realm spaces (parks, open spaces, grass verges) when they do not have the qualified horticultural personnel in place. Last year DLRCOCO recruited 16 more gardeners to their Team. SDCC has no team of gardeners. It is hard to believe that SDCC was not represented at the National Biodiversity Conference in 2018 - no delegate was even sent by the CEO. There is no promotion of Biodiversity in the SDCC area – not even a Biodiversity Week. SDCC need a robust Biodiversity Plan with adequate resources. We need a Biodiversity Officer with Biodiversity Co-ordinators appointed for each of the electoral ward. There are insufficient resources for invasive species removal - invasive animals such as mink etc not being monitored by SDCC. Riparian Infrastructure Policies and Objectives need to be developed – they are currently non-existent despite their contribution to Biodiversity, River Quality and Flood Alleviation. (SDCC-CCAP-201902-47)

Chief Executive Response to Grouping: Biodiversity and Protected Species

SDCC has a dedicated Green Infrastructure working group with representatives across all internal departments. Through the County Development Plan this group help protect the interconnected network of waterways, wetlands, woodlands, wildlife habitats, greenways, parks and conservation lands, forests and other open spaces that adjoin and are threaded through urban areas within SDCC. This Green Infrastructure Network supports native plant and animal species and provides corridors for their movement, maintains natural ecological processes and biodiversity, sustains air and water quality and provides vital amenity and recreational spaces for communities, thereby contributing to the health and quality of life of residents and visitors to the County.

Through the adoption of our Local Area Biodiversity Action Plans the rich biodiversity connection of our wetlands, meadows, hedgerows and rivers can be protected and promoted. Through the variety of our native species and abundance of woodland edge in our parks help to further promote biodiversity.

SDCC was the first Council to tackle the issue of invasive species and currently has two dedicated full-time control staff. Through internal cross departmental consultation SDCC have developed a phone app allowing for photography, reporting and GPS tagging of invasion pockets. From this a better understanding of invasions across the County can be gathered allowing for a more efficient strategy to be adopted for areas in need of removal.

Chief Executive's Recommendation:

It is recommended that no amendments be made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.9.4 Submissions Regarding General Nature Based Solutions

1. Legally it is extremely difficult to set up and XX citizen groups, community groups and benefit groups. If you need to apply for grants you need a bank account, you can't have a bank account without an identity. We need access to legal assistance. If SDCC was to have pathways already set up for our group to access legal assistance this would go a long way to helping our members access better fruit and veg. (SDCC-CCAP-201902-03)
2. I believe that getting out and amongst nature can give a greater appreciation of our environment and therefore anchor the feeling of why we should protect it. I would like to see built for the children of South County Dublin, a network of mountain bike trails in our mountains. It is currently happening for our neighbours in Dun Laoghaire Rathdown (<https://www.thejournal.ie/slieve-bloom-mountain-biking-rural-projects-get-government-funding-goahead-4494659-Feb2019/>). Mountain biking is a sport that children can learn and then enjoy for a lifetime. It is not a team sport and so we are statistically more likely to keep doing it as we get older. To see evidence of its growing popularity, visit Ticknock or The Gap in Glencullen <https://www.thegap.ie/> both in DLRCOCO. Potential Locations: Slievethoull (Slade Valley), Ballinascorney Upper, Ballymorefinn Hill, Seahan. (SDCC-CCAP-201902-08)
3. Ensure all bogs are preserved, protected and take measures to re-wet all SDCC boglands. (SDCC-CCAP-201902-11)
4. The number of foxes and badgers killed on our roads annually is a shame, and all because of lack of planning in building these roads. In many countries there are tunnels built under and above roads to allow wildlife safe crossings avoiding road surfaces. Attached is an article briefly describing these. (No article was attached – JMG) (SDCC-CCAP-201902-17)
5. In terms of urban planning rising sea levels are now unavoidable. No planning permission should be given for commercial and residential properties that are not going to be at least 3 metre above sea level. (SDCC-CCAP-201902-17)
6. In 2019, Gas Networks Ireland will commission Ireland's first renewable gas injection facility generated from anaerobic digestion plants using agricultural residues and by-products. (SDCC-CCAP-201902-25)
7. The RIAI welcomes sustainable approach of the inclusion of "nature-based" solutions. We believe DCC should show leadership in this respect on sustainable strategies. (SDCC-CCAP-201902-27)
8. Urban Geology. As the proposed developments take place in an urbanized environment, we suggest looking at our Urban Geology section on our website. Geological Survey Ireland produces urban geoscience data on a project basis, informing the areas of soil geochemistry and contamination, 3D modelling of ground conditions, and assessing ground motions that present a hazard to citizens in the urban environment. We also have a GeoUrban section to our Map Viewer which covers the Greater Dublin Area. Nature based solutions should be

considered even in an urban environment. For example, an analysis of soil sealing could be done to determine levels of permeability in the Greater Dublin Area. We recommend using the GSI's Quaternary subsoil map and geotechnical database for this task. (SDCC-CCAP-201902-45)

9. There is no report on climate change and the impact it will have on Protected Structures and National Monuments in the SDCC area. Some protected structures are more at risk and these have not been identified and remedial action identified and taken. (SDCC-CCAP-201902-47)
10. The Heritage Officer is not a fulltime position and there is no Heritage Co-ordinator. The Heritage Forum has not met in 2 years which is a real indicator of just how low a priority this is for SDCC. The SDCC Heritage Plan 2010-2015 is out of date again another indicator on how low a priority SDCC sees Heritage. We need a current robust Heritage Plan able to deal with the challenges of Climate Change. There is no qualified Archaeologist engaged by SDCC. (SDCC-CCAP-201902-47)
11. There are very experienced personnel based in the Tymon and Rathfarnham Depots but they have not been consulted by the Climate Action Team in SDCC despite them being on the frontline dealing with the public and dealing with the environment day in day out. The proposal to remove the Parks Depot from Rathfarnham and transferred to the Tymon Depot is a retrograde step as more time will be spent commuting and less available time for 'public realm' works. Local knowledge will be lost. (SDCC-CCAP-201902-47)
12. M50- Green Infrastructure along the M50 was severely compromised with the introduction of an extra lane but there is no programme of Green Infrastructure Planting since this time. (SDCC-CCAP-201902-47)
13. It is worrying that Senior Management were not aware of the requirements of an EIAR - e.g. that a Bird Survey would be needed. Not having biodiversity baseline data at County Hall or an understanding of the ramifications of having Natura 2000 sites in your local authority area is a serious issue that Senior Management have not acknowledged or addressed. It was regrettably on full display during the An Bord Pleanála process to date – the consultants engaged were clearly not briefed on the local environment (local knowledge) of the subject site and the ex situ sites. There was no report presented by the Heritage Officer for example – no consultation. (SDCC-CCAP-201902-47)

Chief Executive Response to Grouping: General Nature-Based Solutions

Many general submissions relate to topics which would be considered outside the scope of the Draft Climate Change Action Plan. A number of submissions relate to the need for the Draft CCAP to interact with a number of wider and sectoral climate change issues i.e. cultural heritage, energy infrastructure etc. Under the National Adaptation Framework, sectoral adaptation plans are required to be prepared and submitted to the Government. South Dublin County Council are cognisant of these plans and will work with other Sectors in reviewing our Plan.

As the Draft CCAP will be approved by the elected members in advance of the finalisation of approval of all twelve sectoral adaptation strategies, it is considered that narrative be included in the Draft CCAPs regarding the role of sectoral adaptation plans and the role that local authorities play in collaborating and working in partnership with sectors to achieve and deliver the sectoral plans, given their common and shared agenda.

SDCC has an extensive capital investment programme that includes the provision of active recreational facilities within the Council's parks and open spaces. Recent programmes and proposals include the playspace programme, the current teen space programme, the astro pitch programme, the pitch renovation programme, the development of athletics tracks at Esker Park and Dodder Valley, the provision, upgrade and development of sports pitches county wide as well as other facilities such as outdoor gym equipment, tennis, skateboard parks, multi-use games areas, a multi-use ball wall area, boules areas, bowling and extensive walking and cycling routes. The Council is also in partnership with Coillte in the Dublin Mountains Partnership which facilitates and promotes the provision of recreation in the Dublin Mountains including the long distance walking trail; the Dublin Mountains Way from South Dublin to Dun Laoghaire across the Dublin Mountains and this area includes the provision of the Mountain Bike Trail in Coillte owned lands. The provision of further mountain bike trails at the areas suggested will be a decision for the land owners.

All planning applications are reviewed by SDCC to ensure compliant with Chapter 8 of the County Development Plan (CDP) in relation to Green Infrastructure. All applications must take account of the connectivity of our waterways, wetlands, woodlands, wildlife habitats, greenways, parks and conservation lands, forests and other open spaces that adjoin and are threaded through urban areas. The protection of these assets is key to the strategy as out lined in G1 Objective 2 of the CDP.

In Drafting the CCAP extensive internal consultation was carried out across all Council Departments as well as a six week public consultation period from Monday 11th February to Monday 25th March 2019. In collaboration, every department within South Dublin County Council was involved throughout both consultations.

SDCC provides advice and assistance to Local Community Groups such as Tidy Towns and Resident Associations. Our bi-annual Community Grants Programme is aimed at providing financial assistance to Community and Voluntary Groups who are responding to locally identified needs within their communities.

As part of the process in drafting the CCAP and in order to ensure compliance with all National and European Environmental Legislation an Environmental Consultant was engaged to produce Natura Impact Report (NIR) and a Strategic Environmental Assessment Environmental Report. These reports accompany the CCAP are were part of the public consultation process. Any amendments proposed by the appointed consultants to take into account any recommended changes or additions/omissions to the text or actions contained in the Plan will be submitted to the members of SDCC for consideration.

Chief Executive's Recommendation:

It is recommended that no amendments be made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

Table 5.9 Action Area: Nature Based Solutions - Summary of amendments to actions and new actions

Nature-Based Solutions	Recommendation
1	No Change
2	No Change
3	No Change
4	No Change
5	No Change
6	No Change
7	No Change
8	No Change
9	No Change
10	No Change
11	No Change
12	No Change
13	No Change
14	No Change
15	No Change
16	No Change
17	No Change
18	No Change
19	No Change
20	No Change
21	No Change
22	Include native species into local authority plans where appropriate as a key nature based measure where appropriate
23	No Change
24	No Change
25	No Change
26	No Change
27	No Change
28	No Change
29	No Change
30	No Change
31	No Change
32	No Change
33	No Change

5.10 Actions on Resource Management

23 actions are outlined under the theme of Resource Management in South Dublin County Councils draft Climate Change Action Plan 2019-2024. There were 65 items of submissions received, primarily relating to waste reduction, waste recycling, waste prevention and waste reuse. 2 new actions were identified and amendments were made to 1 action as a result of the submissions. These are outlined below.

5.10.1 Submissions Regarding Waste Management and Waste Collection Issues

1. The RIAI welcomes the implementation of a water conservation campaign in civic buildings and the implementation of an education programme to tackle climate issues related to the water sector. *Waste management* - As mentioned under section 12, the RIAI encourages DCC to quantify the overall value of renovation vs. demolition of its existing stock. More specifically, a holistic method for cost-benefit analysis (including energy efficiency, historic value of the buildings, embodied carbon, etc.) should be developed. Investors are increasingly worried about costs of future demolition where countries such as the Netherlands are moving to circular economy principles. Against this background, DCC should not only fund action 36 - Develop sustainable construction waste policy (action awaiting funding) but also act as a true leader in our transition to a more sustainable built environment and introduce full building life cycle assessment for new built. Life cycle assessment is a key indicator under Level(s) – the EU framework for sustainable buildings. (This submission was sent directly to SDCC as well as DCC) (SDCC-CCAP-201902-27)
2. Page 80 states that SDCC will introduce a comprehensive waste prevention and recycling programme within the Council... I am surprised this does not already exist? What has happened since Minister Noel Dempsey putting waste in the hands of the county manager over a decade ago and now to put such systems in place? This should be clarified. (SDCC-CCAP-201902-28)
3. Introduce solar-powered “belly bins” at strategic locations such as public parks. (SDCC-CCAP-201902-35)
4. Waste Management: There is a need for an overhaul of the waste management function amongst Local Authorities and their areas. The failure by the regulatory bodies to inspect waste companies and their ‘recycling’ practices is poor. So, it is common knowledge that some waste companies breach their licenses e.g. some companies will collect black and brown bins together so they going to the same truck even though the customer has separated out the waste. SDCC do not require their tenants to have a bin account as part of their tenancy agreements. (SDCC-CCAP-201902-47)
5. The Council needs to take a leadership role in all aspects of handling waste. This could be by changing all county bins over a two-year period to segregated bins. Bins could be developed that will have two divisions or even three. This would be non-recyclable, Recyclable and Organic. (SDCC-CCAP-201902-49)
6. That Bottle Banks are actively put in as part of all new council developments. (SDCC-CCAP-201902-56)
7. That SDCC change their planning laws and enforce that larger companies/food outlets/Pubs must provide recycling facilities to include cardboard and bottles along with cans and that the council commit to the maintenance and clean-up of these (SDCC-CCAP-201902-56)

8. That all council owned building have recycle banks and encourage and promote recycling including community centres (SDCC-CCAP-201902-56)
9. That SDCC email reports etc. and desist from printing where possible and encourage and promote this as a policy and this applies in all council owned buildings (SDCC-CCAP-201902-56)
10. All council buildings, owned or leased, should have a compostable waste collection system as well as dry recycling. (SDCC-CCAP-201902-57)
11. Public bins need to be segregated into recyclable and non-recyclable sections. Large volumes of the waste in public bins is plastic bottles. (SDCC-CCAP-201902-67)

Chief Executive Response to Grouping: Waste Management and Waste Collection Issues

South Dublin County Council operates a three-bin system in their buildings, which are non-recyclable, recyclable and organic and will continue to do so. South Dublin County Council's Litter Management Plan informs that 'big belly' bins will be installed in the Rathfarnham area of the county on a trial basis, their success may lead to their installation in other areas. The Litter Management Plan will be coming under review this year, public segregated bins will be examined in this context. Further projects and initiatives that are considered by this policy are, domestic presentation of waste, waste from fast food/ take out venues, dog foul waste will be addressed under the ongoing Green Dog Walker Campaign, bottle and other bring banks and their location (Action 16).

The Council monitors and regulates permitted waste recycling facilities, while the EPA regulates licenced facilities. Permitted facilities are subject to planned and unplanned inspections and audits. The number of inspections and audits are recorded. Demolition waste is segregated at source or at a waste recycling facility (Action 1).

Some submissions provided to other Dublin Local Authorities suggested that the local authority should operate domestic waste services as some current operators are seen to operate in an environmentally inefficient manner. Actions and policies relating to these are set out in the 2014 document - "A Resource Opportunity - Waste Management Policy in Ireland" which is due for review in 2019. This review will inform the development of a future national waste management policy, including environmental goals, regulatory and market structures and policy instruments and tools. This action is therefore outside the remit of the CCAP.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.10.2 Submissions Regarding Complimentary Currencies and the Role of LAs in Deposit and Return Scheme

1. Growth is driven by debt-based money. Please consider introduction of a local currency @Good Money for Bad Times'. Many examples internationally eg Brixton £, Liverpool £, Bristol £. There are 60 in Germany. Could work with Timebank – possible initiative under 300K boost for tourism. (SDCC-CCAP-201902-04)
2. Develop an initiative for recycling of glass and plastic bottles with a deposit scheme (SDCC-CCAP-201902-46)

Chief Executive Response to Grouping: Complimentary Currencies and the Role of LAs in Deposit and Return Scheme

Complimentary Currency Schemes are mainly used to promote local business and outside the scope of this document. South Dublin County Council use a similar scheme called 'Social Credits' whereby groups and individuals are rewarded for work carried out in the community.

A number of submissions to the other Dublin Local Authorities suggested that the local authority should operate a mandatory deposit and return scheme for plastics.

Actions and policies relating to these are set out in the 2014 document - "A Resource Opportunity - Waste Management Policy in Ireland" which is due for review in 2019. This review will inform the development of a future national waste management policy, including environmental goals, regulatory and market structures and policy instruments and tools. This action is therefore outside the remit of the CCAP.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.10.3 Submissions Regarding the Banning of Single Use Plastic

1. Enforce a no single use plastics rule, there are alternatives, they just cost commercial entities more. (SDCC-CCAP-201902-01)
2. Eliminate all single-use plastics unless absolutely necessary (SDCC-CCAP-201902-11)
3. Plastic is one of the biggest menaces facing humanity. A lot of the people are not aware of the magnitude of the problem, and of those who are, a lot find solace in the "fact" that their single use plastic will be recycled. However, >90% of the plastic ever produced has never been recycled. So, there is a very high chance that a soft drink bottle used today will stick around for ~450 years. Unless the trend changes. (SDCC-CCAP-201902-19)

4. SDCC needs to ban plastic bottle sale and use and supply in south Dublin. All solid reusable durable materials can be used for drinking purposes. The same approach needs to be taken with bags. The sale and supply of plastic and paper single use non-durable material bags must be banned. People simply have to plan ahead bring drinking containers and bags when they will need them or use businesses and venues that supply such things onsite or charge for supply of long-term versions of these items. (SDCC-CCAP-201902-17)
5. Banning of plastic takeaway packaging, straws, cups, cutlery etc. to be replaced with e.g. rented stainless steel on deposit, rented beer glasses such as at German beer festivals, or Nalgene/ bamboo cups with silicone lids and deposits. Ban plastic single use containers. Promote cloth napkins. (SDCC-CCAP-201902-30)
6. Provide drinking water fountains to reduce usage of single use plastic containers. At festival events such as the Lucan Festival in September provide mobile water tanks again to reduce usage of single use plastic containers. (SDCC-CCAP-201902-35)
7. Drinking water pipes should be installed in all SDCC Parks – this would reduce plastic & obesity (SDCC-CCAP-201902-47)
8. There needs to be more choice of loose produce. These kinds of initiatives are even more vitally important given that plastic wrap and bags mostly cannot be readily recycled anymore, and a lot of fresh produce is wrapped in plastic. Increasing recycling targets will be very difficult unless people can avoid plastic more readily. (SDCC-CCAP-201902-57)
9. "Eliminate single-use plastics at Council organised events" could be expanded to include events which require council permission e.g. street feasts. (SDCC-CCAP-201902-67)
10. While in reality the council cannot enforce this, stating it as a requirement will force people to consider their actions. (SDCC-CCAP-201902-67)
11. Consider how SDCC can support sharing economy to reduce consumption. (SDCC-CCAP-201902-67)

Chief Executive Response to Grouping: Banning of Single Use Plastic

Action 10 applies for Council organised events.

Many submissions called on South Dublin County Council to ban the use of Single Use Plastic within the Council and within the functional area of the Council, enforcing a ban on all organisations.

South Dublin County Council has been part of a number of projects within its functional area that have led to a reduction and elimination of single use plastics. Examples include:

- To reduce waste and the provision of single use plastic to customers was part of the fast food/ take away outlets campaign
- The Conscious Cup campaign is running within the Council building
- The provision of water tankards at festivals and gatherings such as Flavour of South Dublin
- Water fountains installation in public parks

It would be outside the remit of the local authority to implement a wider county ban on all single use plastic users. Actions and policies relating to these are set out in the 2014 document - "A Resource Opportunity - Waste Management Policy in Ireland" which is due for review in 2019. This review will

take account of any EU legislation emanating from a recent vote by the European Parliament to ban a range of single use plastics. This action is therefore outside the remit of the CCAP.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.10.4 Submissions Regarding Waste Reduction

1. Encouraging local groups and organisations in their efforts to reduce waste, go plastic free and increase recycling. (SDCC-CCAP-201902-01)
2. Stop binning all SDCC food waste - it should either go to charities such as food cloud or to anaerobic/aerobic digestion - or composters at bare minimum. (SDCC-CCAP-201902-11)
3. SDCC should establish a renew, reuse, recycle centre similar to the Rediscovery Centre in Ballymun. (SDCC-CCAP-201902-32)
4. Composting Facilities or a wormery at County Hall (for their canteen and coffee dock) (SDCC-CCAP-201902-47)
5. Election Posters and their associated electrical ties should be banned (SDCC-CCAP-201902-47)
6. There is no recycling facility with SDCC bins. There needs to be resources set aside for dog bins (SDCC-CCAP-201902-47)
7. Sustainable disposal of unsold food: That SDCC incorporate into the plan that they will actively promote FoodCloud and encourage all shops to give unsold food to local causes that they can distribute to those in need SDCC has a role in this in encouragement and support. This should limit food waste (SDCC-CCAP-201902-56)
8. We welcome the various actions to reduce waste of material resources and become more resource and energy efficient (SDCC-CCAP-201902-42)
9. GNI supports the Council's actions on Resource Management. GNI recommends that the Council considers the opportunity to use brown bin wastes from the region as feedstocks in anaerobic digestion plants to produce renewable gas. This would help support the circular economy vision which is outlined in section 5.2 of the 'Eastern - Midlands Region Waste Management Plan 2015 – 2021'. (SDCC-CCAP-201902-62)

Chief Executive Response to Grouping: Waste Reduction

South Dublin County Council encourages the reduction of waste and increase of recycling through its many campaigns and grant schemes. The Council operates a three-bin system in their buildings, which are non-recyclable, recyclable and organic and will continue to do so. Dog waste can be disposed of in any non-recyclable bin (Actions 5, 6, 7, 8, 9, 11, 13, 14 and 16 apply).

The removal and therefore reduction of waste is at the top of the waste pyramid, and therefore a key goal of South Dublin County Council. Submissions made to us and the other Dublin LAs relate to the elimination of single use plastics. Some refer to actions relevant to a deposit and return scheme. A national examination of an Irish scheme has been commissioned. Some suggestions refer to EU plastics strategy and proposed plastics directive and packaging directives. This is beyond the scope of the plan. Taxation of single use cups is a national issue and again is beyond the scope of this plan. However, South Dublin County Council is undertaking its own initiatives in this area including the removal of these items from all staff canteens and the introduction of a Conscious Cup Campaign. South Dublin County Council will also work with Refill Ireland which aims to reduce our dependence on single use drinking bottles. The aim in 2019 is to work with Refill at an event in our functional area and to grow on this and to demonstrate there is an alternative to single use plastics in these types of events.

Other submissions relate to waste management solutions to be rolled out specifically in relation to businesses. The Local Enterprise Office will carry out further research to engage with stakeholders to promote and develop business supports to encourage reduction of emissions and other climate driven actions, and to develop targets that could be measured on progress being achieved. This may include waste reduction initiatives.

Suggestions regarding the reduction of food waste, waste segregation and the use of the appropriate food waste receptacles are referred to in Actions 6 and 7.

Chief Executives Recommendation:

It is recommended that the following amendments be made to the Draft CCAP.

Action 9: Amend to read: ~~Use Eco-Merit programme to advise businesses on reducing waste~~ Promote programmes to advise businesses on reducing waste e.g. Eco-Merit

Action 25: Explore collaboration with stakeholders such as Refill.ie to reduce single use items

SEA Comment

Promotion of circular economy and reduction of waste is consistent with SEOS particularly around material assets and climate change.

AA Comment

This amendment will not have the potential to result in likely significant effects to European Sites.

5.10.5 Submissions Regarding Waste Recycling

1. Support and engage with existing programmes that encourage the recycling of materials such as Every Can Counts (www.everycancounts.ie) work with schools, work places, events, organisations to switch to more recyclable materials when granting events permissions/ licenses. (SDCC-CCAP-201902-01)

2. Survey telephone kiosks no longer in use and initiate consultation on how these can be put to other purposes such as public art. (SDCC-CCAP-201902-35)
3. Install water butts in suitable locations at public buildings. (SDCC-CCAP-201902-35)
4. Any café using biodegradable cups should have a dedicated bin for composting such cups on the premises. (SDCC-CCAP-201902-57)
5. Consider how SDCC can support sharing economy to reduce consumption. (SDCC-CCAP-201902-67)
6. Begin exploratory research on ‘cradle to cradle’ (C2C) opportunities for south Dublin enterprises (SDCC-CCAP-201902-46)
7. The Council should consider the opportunity to use brown bin wastes from the County as feedstocks in anaerobic digestion plants to produce renewable gas. This would help support the circular economy vision which is outlined in section 5.2 of the ‘Eastern -Midlands Region Waste Management Plan 2015 –2021’. During 2019, Irish Water will consult on our draft National Water Resources Plan which will identify how we will provide a sustainable, secure and reliable water supply to our customers now and into the future whilst safeguarding the environment. (SDCC-CCAP-201902-25)

Chief Executive Response to Grouping: Waste Recycling

Waste enforcement activities, waste segregation, promotion of zero waste policy (including business), and supply of public bins (including a trial of solar compacting, labelling and recycling) are considered in our Actions.

The Council has run initiatives to encourage repair, recycling and upcycling of clothes, goods and furniture. (Actions 5, 6, 7, 8, 9, 11, 13, 14 and 16 apply).

It would be outside the remit of the local authority to enforce waste recycling outside of the authority provided by the Waste Management Act 1996 as amended. Waste recycling campaigns will continue to educate our citizens to provide informed decisions and responsible choices.

The promotion of a circular economy is considered in Actions 6, 8, and 9.

Chief Executives Recommendation:

It is recommended that the following action be added to the Draft CCAP as follows:

Action 24: Promote recycling and the circular economy to householders through a range of workshops, talks and programmes.

SEA Comment

Promotion of circular economy and reduction of waste is consistent with SEOS particularly around material assets and climate change.

AA Comment

This amendment will not have the potential to result in likely significant effects to European Sites.

5.10.6 Submissions Regarding Waste Prevention

1. There appeared to be very little in relation to waste which is a real issue. Possibly having public champions or such. Passionate volunteers who take responsibility for an area. Role being informing the council of concerns and working with them to fix them. (SDCC-CCAP-201902-13)
2. There are very little initiatives in place to encourage managing waste properly in the work place. I would like to propose that more obligatory training or workshops are put in place for offices to attend, as well as companies so that people understand the effect of all of their waste going into one bin and avoiding recycling and compost bins. This obviously has a huge negative impact on waste for our country as people are in work more than they are at home in a lot of cases. This should be addressed (SDCC-CCAP-201902-15)
3. Bins need to be of adequate capacity and not accessible to wildlife (foxes, seagulls etc) who cause considerable litter problems. More litter wardens enforcing fines. Don't be Dick campaign was great, more of this! (SDCC-CCAP-201902-67)
4. Annual electrical recycling collections for the public. (SDCC-CCAP-201902-67)
5. Measures to reduce waste in the River Liffey, Royal and Grand Canal (SDCC-CCAP-201902-67)

Chief Executive Response to Grouping: Waste Prevention

The Council do not provide annual collection of waste electrical and electronic equipment as this sort of waste can be taken to any retailer that sells a similar item, the retailer is obliged to accept the waste item for recycling, as directed by the Waste Management Act 1996 as amended and the European Union (Waste Electrical and Electronica Equipment) (WEEE) Regulations 2014 as amended.

The Council provide many reduce food waste courses to the general public during Eco Week. Many types of other waste prevention courses are run during Eco Week which is held annually.

Litter Management Plan informs on how the Council deal with litter. The Council support many groups and individuals in their clean ups, providing the H&S clothing, litter picks and bags and the removal of the waste.

Chief Executives Recommendation:

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.10.7 Submissions Regarding Waste Reuse

1. We propose the addition of a 'Reuse education' programme. Ensuring community and corporate members are aware of the potential and benefits of reuse as an alternative. We propose the

creation of an online community resource where up to date relevant information is available on opportunities for reuse, training provided to members of the community and an online calculator where individuals can calculate the amount of resources saved by their reuse to encourage participation. (SDCC-CCAP-201902-16)

2. As an aspect of SDCC's current involvement in the Conscious Cup campaign I would suggest that participation in this campaign be made a condition of the granting of a licence to any cafe / market stall operating in any SDCC property including public parks and that SDCC work with adjacent councils with parks nearby used by SDCC residents e.g. Bushy Park. Likewise, market stall licence holders selling take away food should be required to use recyclable food containers. (SDCC-CCAP-201902-26)
3. Explore grey water options for toilets, washing machines, garden watering and car washing facilities (SDCC-CCAP-201902-46)
4. Create initiatives that encourage residents to get involved in composting (SDCC-CCAP-201902-46)

Chief Executive Response to Grouping: Waste Reuse

Through South Dublin County Council Litter Management Plan many waste reuse campaigns are brought to fruition. Eco week hosts many courses including a course on Master Composter, food, grey water recycling.

It would be outside the remit of the local authority to enforce waste reuse outside of the authority provided by the Waste Management Act 1996 as amended. Waste reuse campaigns will continue to educate our citizens to provide informed decisions and responsible choices.

Chief Executives Recommendation:

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.10.8 Submissions Regarding Engagement

1. The plan needs greater ambition to not just inform the public on climate change but to support and enable behaviour change. (SDCC-CCAP-201902-02)
2. Climate Change Awareness – Climate Ambassadors are a perfect match to help with this aspect. To deliver talks & workshops to the SDCC staff, schools and wider community. (SDCC-CCAP-201902-11)
3. Host annual climate festival to bring the public, local authority and businesses and NGO's together, to share ideas, raise awareness and to celebrate best practice. (SDCC-CCAP-201902-11)

4. The following observations are focused on citizen action and climate mitigation measures. Public Awareness and Advocacy or Citizen and Community Engagement. The report does say there is an action to engage and inform citizens. 'as public awareness is key to tackling both climate adaptation and mitigation, South Dublin County Council commits through this plan to address the current knowledge-gap and will encourage citizens to act on climate change through a range of awareness and behavioural change actions....'

With a target to: 'Actively engage and inform our citizens on climate change' and 'Finally, as citizens are crucial for solutions to climate change, SDCC will set out to actively inform and engage the public, through a range of innovative programmes and partnerships and, where possible, facilitate bottom-up, community-led solutions.' 'County development plans, local area plans and Strategic Development Zone (SDZ) planning schemes can address climate change issues at a local level. This CCAP is cognisant of the role that the DLAs must play in increasing citizen awareness and participation in climate solutions and the unique position that local government holds in interacting with its citizens.' Public participation and encouraging environmentally friendly living is paramount to slowing, if not halting climate change. Behavioural change is needed, and sooner rather than later. All actions are beneficial, and everyone has a role to play no matter how big or small. It is recognised that a public awareness strand runs through all the action areas. The report would benefit from being explicit in the area of public actions with a sixth action area titled Public Awareness and Advocacy. This section would solely focus on public awareness, knowledge building, and advocacy. Everyday actions that can be taken by the public could be outlined. There are existing networks which could be leveraged to encourage community and individual actions. Programme could be run featuring different aspect of living and the range of actions that could be taken from no cost to high cost actions.

The Council could look to establish:

- climate action ambassadors within communities embedded in community led volunteer groups
 - climate action network comprising community led volunteer groups such as Tidy Towns, Residents Groups, etc.
 - tap into the Local Authority Water and Communities Office and any other relevant government agencies and
 - Information provision – website, talks, leaflets, campaigns, local newsletters, local papers
 - Explicit links to national and EU plans
 - Climate Action topic weeks/ months on different aspects of living and actions that can be taken. (SDCC-CCAP-201902-20)
5. Residents' Associations are a potential resource for SDCC for raising public awareness of relevant climate action initiatives. A section on SDCC website, for example the News section, could contain up to date information on such initiatives in a format easily transferable to Residents' Associations' newsletters and/or websites. (SDCC-CCAP-201902-26)
 6. Education of SDCC staff, Ideas forum for SDCC staff to submit ideas for actions to reduce energy consumption, use of single use plastic (e.g. to bag rubbish/cleaning pathways waste), use of

imported materials / food, waste, pesticide use, etc. in the carrying out of their work. (SDCC-CCAP-201902-32)

7. Education of the general public, Climate Action Roadshow for DLA areas to educate the public on what actions SDCC is taking, what actions the public can take, what support / help is available from SDCC and other bodies. Information on screen in public buildings – waiting areas, libraries, etc. Ideas forum for the general public – to contribute ideas on CC action via SDCC website. (SDCC-CCAP-201902-32)
8. That SDCC actively engage with residents groups and schools and Clubs/groups in the promotion and planting of trees and explains the importance of trees (SDCC-CCAP-201902-56)
9. That SDCC Encourage areas for pollination that encourage Bees and again that SDCC actively engage with residents groups and schools and Clubs/groups in the promotion and explains the importance of Bees (SDCC-CCAP-201902-56)
10. That SDCC actively engage and promotes the establishment of Tidy Towns in all areas to combat litter and improve our areas (SDCC-CCAP-201902-56)
11. Establish a local business award for local businesses who change their production to closed loop systems and repurposing in terms of resource/raw material use or in the produce area for those who set up refill / zero waste systems for selling produce to their customers, e.g. using reusable cotton bags for rice, nuts, beans etc. and jute bags for loose potatoes, onions and other fresh produce. (SDCC-CCAP-201902-57)

Chief Executive Response to Grouping: Engagement

South Dublin County Council and the other Dublin LAs received a number of submissions requesting additional public and citizen engagement across a range of climate change issues. Issues raised in submissions include: the need for more citizen information on grants, public advertisements, workshops on climate change, integration of climate change with educational curriculum and related funding, communication of climate change projects to the public, engagement with younger citizens, behavioural change campaigns, the need for diverse stakeholder engagement, links to international programmes, the need for climate change teams, summits and community development structures. (Actions 5, 6, 7, 8, 9, 11, 13, 14,16 and 18 apply).

New text will be added to the CCAP under 'Public Awareness' to address this.

Chief Executives Recommendation:

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.10.9 Submissions Regarding Grants and Supports

1. Expand community gardens into derelict areas, local parks, grass verges, hedge rows etc. Perhaps provide training & grants to vulnerable sectors to encourage engagement. (SDCC-CCAP-201902-11)
2. Ensure LEO's have sustainable projects only on their books. Perhaps extra grants to sustainable start-ups? (SDCC-CCAP-201902-11)
3. That SDCC initiate a recycling week and again actively promote and encourage (SDCC-CCAP-201902-56)
4. Support farmers markets. (SDCC-CCAP-201902-67)

Chief Executive Response to Grouping: Grants and Supports

Through the Councils Eco Week many courses are provided to the public, hosted by SDCC in collaboration with our partners (Actions 5, 7 and 14 apply).

Grants continue to be available and supplied through the Council. Community gardens etc are considered under this grant scheme (Actions 5 and 14 apply).

The Local Enterprise Office carries out research to engage with stakeholders to promote and develop business supports to encourage reduction of emissions and other climate driven actions, and to develop targets that can be measured on progress being achieved. This may include waste reduction initiatives (Action 9).

South Dublin County Council supports farmers markets.

Chief Executives Recommendation:

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.10.10 Submissions Regarding Veganism

1. Although SDCC obviously does not engage in agriculture it has canteens where there are choices with regard to the CO2 intensity of the food on offer. SDCC could for example join Paul McCartney's 'Meat Free Monday' campaign i.e. having no meat on the menu in its eating areas on Mondays. This symbolic gesture can highlight the very high emissions associated with meat production as opposed to dairy or plant-based meal production and the other health and environmental benefits of reducing meat consumption. (SDCC-CCAP-201902-28)
2. Increase vegan and vegetarian food choices across all SDCC buildings and events - and even host some events completely as vegan/vegetarian. (SDCC-CCAP-201902-11)

Chief Executive Response to Grouping: Veganism

A number of submissions to DLA were received which recommended that the Council promote a plant based diet to citizens and suggested removing incentive for dairy and animal farming and providing supports to businesses to become meat free.

Whilst the Intergovernmental Panel on Climate Change (IPPC)'s Synthesis Report on the final part of its Fifth Assessment Report (AR5) does detail that diet has significant potential to reduce GHG emissions from food, it is the role of the Department of Health (through its policies and initiatives such as Healthy Ireland) and not the local authority to provide dietary advice. It is not the remit of the local authority to provide dietary advice and as such is outside the remit of the CCAP.

Incentive schemes for food production fall within the remit of the Department of Agriculture and as such is outside the remit of the CCAP.

Chief Executives Recommendation:

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

Table 5.7 Action Area: Resource Management - Summary of amendments to actions and new actions

Resource Management	Recommendation
1	No Change
2	No Change
3	No Change
4	No Change
5	No Change
6	No Change
7	No Change
8	No Change
9	Use Eco Merit programme to advise businesses on reducing waste Promote programmes to advise businesses on reducing waste e.g. Eco-Merit
10	No Change
11	No Change
12	No Change
13	No Change
14	No Change
15	No Change
16	No Change
17	No Change
18	No Change
19	No Change
20	No Change
21	No Change
22	No Change
23	No Change
24	Promote recycling and the circular economy to householders through a range of workshops, talks and programmes
25	Explore collaboration with stakeholders such as Refill.ie to reduce single use items

5.11 Milestone 4: Implementation

Submissions relate to open and transparent implementation of the CCAP, assessment of climate actions, short to long term implementation of actions and the need for immediate action on climate change.

Milestone 4 of the Draft CCAP relates to Implementation.

The CCAP includes a range of climate actions across the five theme areas of Energy & Buildings, Transport, Flood Resilience, Nature Based Solutions and Resource Management. Having regard to submissions received, it is noted that the timescale for action implementation and the Council department responsible, is also indicated in the CCAP. Actions are to be implemented by the Council in the short, medium and longer term.

The Council has established a cross-departmental Climate Team who will be responsible for implementing the actions included in the CCAP. The development and implementation of CCAP actions will be supported by both Codema and the Dublin Climate Action Regional Office. Codema will provide ongoing support to the CCAP in the areas of research, planning, technical assessment, cost benefit analysis, procurement, project management, funding applications and communications. The Dublin CARO will work with all four Dublin local authorities in implementing CCAP actions, including developing research opportunities and pilot project across the four Dublin local authorities. The CARO will also have a role in reviewing action implementation across the four Dublin local authority CCAPs.

In implementing the CCAP, the Council will adhere to current best practice guidelines in this area, including The Covenant of Mayors for Climate and Energy Reporting Guidelines. This includes monitoring actions with regard to staff resourcing, action budget allocation, stakeholder and citizen engagement, CO2 emissions reduction etc.

It is considered that the implementation of the CCAP is adequately addressed in the Draft Plan.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.12 Milestone 5: Monitoring and Iteration

Submissions relate to implementation timescale to 2030, the need to ensure energy target monitoring and compliance, measurable and time-bound actions, clarity regarding baselines and the need for quality data analytics.

Milestone 5 of the Draft CCAP relates to Monitoring and Iteration.

The CCAP will be updated on an annual basis, with a review and revision every five years. At each revision the updated CCAP will take account of demographic, technical and other changes that have occurred and any new targets that have been introduced. Updated data in relation to action monitoring and iteration will form part of the CCAP review process.

As the Council is a signatory to the EU Covenant of Mayors for Energy and Climate, this CCAP will be submitted to the Covenant to fulfil participation protocols. This commitment initiates the beginning of a long term process, whereby the Council will be committed to reporting every two years to the Covenant of Mayors, on the implementation progress of the Plan.

In implementing and monitoring the CCAP, the Council will adhere to current best practice guidelines in this area, including The Covenant of Mayors for Climate and Energy Reporting Guidelines. This includes monitoring actions with regard to staff resourcing, action budget allocation, stakeholder and citizen engagement, CO₂ emissions reduction etc. This can also include a Monitoring Emissions Inventory which tracks progress in CO₂ emissions and energy demand reduction when compared to the CCAP baseline year.

It is considered that the implementation, timescales, monitoring and iteration of the CCAP is adequately addressed in the Draft Plan.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.13 Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)

	Submissions on the Environmental Report	SEA and AA Response
Cian O'Mahony,	Environmental Protection Agency (EPA)	
	<p>Health related aspects It would be useful to include additional information on the potential health impacts of climate change (e.g. hot and cold extremes) and how they are to be addressed. The interactions with the health sectoral adaptation plan should also be discussed.</p>	<p>Chapters Four and Seven of the SEA ER will be expanded upon to highlight and discuss the health related aspects.</p>
	<p>SEA and Plan Integration We recommend that consideration is given to including a subsection in the Plan, showing how the SEA has influenced its preparation. This would serve to clearly show the link between the Plan and SEA processes.</p>	<p>A section in the Final CCAP will be included that provides information on how the SEA and AA has influenced the plan process.</p> <p>Strategic Environmental Assessment (SEA) is a statutory process, involving the systematic evaluation of the likely significant environmental effects of implementing the new Climate Change Action Plan before a final decision has been made to adopt it. SEA applies to environmental assessment of plans and strategic actions that influence and set the framework for projects.</p> <p>The EU Directive on Habitats (92/43/EEC) (the Habitats Directive) as transposed into Irish law through the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I.477 of 2011) requires the</p>

	Submissions on the Environmental Report	SEA and AA Response
		<p>assessment as to whether the implementation of a plan is likely to have significant effects on any Natura 2000 site(s).</p> <p>The CCAP was screened to determine whether it has any significant impact on any Natura 2000 site. This screening determined that stage 2 Appropriate Assessment was required.</p> <p>It should be noted that whilst the AA is a statutorily separate process to the SEA, it is, in fact, a parallel process and as such the outcomes of the AA fed into and informed the SEA process outlined above.</p> <p>The SEA and AA processes have worked together to influence of plan preparation and the SEA process highlights where particular environmental sensitivities arise, and also make recommendations as to how proposed actions may be improved to increase their environmental performance.</p> <p>Proposed changes to the CCAP through the Chief Executives Report have been screened for SEA and AA to ascertain if likely significant environmental effects or significant effects on European sites would arise.</p>

	Submissions on the Environmental Report	SEA and AA Response
		Both processes have identified additional mitigation measures for the CCAP and the SEA has also provided for a monitoring regime, which is included within this CCAP. All mitigation measures identified for the CCAP through the SEA and AA process will be adhered to and implemented over the course of the plan.
	<p>Assessment of Alternatives</p> <p>We welcome that the EPA 'Developing and Assessing Alternatives in Strategic Environmental Assessment' (2015) guidance document has been considered in preparing and assessing alternatives. We also note the alternatives considered in the SEA, and the selection of the preferred alternative</p>	Noted.
	<p>Additional Plan Considerations</p> <p>Irish Water's Draft National Water Resources Plan should be useful to refer to, in terms of ensuring security of drinking water supply within the Plan area, is also considered. This plan includes consideration of climate change impacts. Aligning adequate and appropriate critical service infrastructure and population / economic growth of the Dublin region is essential.</p>	<p>Noted and agreed.</p> <p>Chapters 4 and 7 of the SEA ER will be expanded in the material assets section to discuss this.</p> <p>Chapter 3 will include reference to the Draft National Water Resources Plan</p>
	<p>The link between the Plan and the sectoral adaptation plans could also be expanded on. This would clarify the alignment between the plan and other higher level sectoral plan.</p>	<p>Noted and agreed.</p> <p>Chapter 3 of the SEA ER will expand upon this and the links to other high level sectoral plans where appropriate</p>
	Mitigation Measures	
	<p>We acknowledge the SEA recommendations, to improve the Plan in terms of integrating wider environmental considerations into the Plan. We note the recommendation to prepare and implement a coastal zone management plan for Dublin Bay. This should be prepared in collaboration with relevant stakeholders and consider the requirements of the SEA and Habitats Directives, as appropriate.</p>	Noted, not pertinent to SDCC.

	Submissions on the Environmental Report	SEA and AA Response
	In relation to the application of strategic urban drainage systems as part of flood risk management actions described, these should be supported by relevant monitoring and maintenance also to ensure they operate effectively over the lifetime of the Plan.	Noted. The SEA recommends that interval monitoring and maintenance of strategic urban drainage systems be undertaken.
	Where the potential for likely significant effects is identified, appropriate mitigation measures should be recommended and implemented, to avoid or minimise these. You should ensure that the Plan includes clear commitments to implement these mitigation measures	Noted – it is recommended that as part of the text on the influence of the SEA and AA on the plan preparation, a specific commitment is included regarding mitigation measures and adherence to same. Please see the CCAP for this commitment as addressed in Point 2 <i>SEA and Plan Integration</i> above.
	Monitoring The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and address the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. We welcome that the proposed SEA monitoring programme sets out the various data sources, monitoring frequencies and responsibilities. We recommend that the SEA Monitoring of environmental receptors, as set out in Table 12 (Chapter 9 - Monitoring) of the SEA, is incorporated into the Plan review to monitor how effectively environmental considerations are being implemented.	SEA recommends inclusion of the Monitoring Table in the final Plan. The introduction to Chapter 9 monitoring of the SEA ER highlights additional monitoring in the event of unforeseen and cumulative effects arising.
	Where possible, additional information on monitoring and indicators of the transition should be considered to ensure that resources continue to be appropriately directed and to help avoid unintended secondary adverse impacts	Noted, Given that the SEA monitoring table will provide environmental monitoring of the CCAP as well as annual monitoring of the CCAP, it is considered sufficient at this point to capture the transition based on annual

	Submissions on the Environmental Report	SEA and AA Response
		monitoring of the action plan, supported by SEA monitoring.
	The potential for environmental impacts of 'grey' and 'green' adaptation options will differ. Where 'grey' adaptation options are chosen / proposed to be implemented, these should be adequately mitigated for, to minimise potential adverse significant environmental effects.	Noted and agreed. Mitigation Measures for 'grey' infrastructure will be highlighted in the Final SEA ER.
	Should the monitoring identify adverse impacts during the implementing the Plan, SDCC should ensure that suitable and effective remedial action is taken.	Noted, this statement is included in the SEA ER.
	It is noted in Milestone 5 that the Plan will be monitored and updated on an annual basis, with a review and revision every 5 years. Any updates to the Plan, should be screened in the context of SEA and Appropriate Assessment requirements	Noted, this statement will be included in the final CCAP, see also proposed text below
	Monitoring should capture the overall achievement of the actions set out in the Plan and the contribution to the overall combined actions and targets of the four local authority plans.	Noted. It is recommended an additional text be provided to the above to highlight consistency with the requirements of the SEA Directive and reflecting the submission by the EPA, as follows: Monitoring at local authority level is in line with current best practice such as EU Covenant of Mayor's approach. Each CCAP will be submitted to the Department of Communications, Climate Action and Environment. Under current obligations monitoring is adequately addressed in the CCAP and SEA. In addition, this may be premature in light of forthcoming Final Eastern Midland and Regional Spatial and Economic Strategy and

	Submissions on the Environmental Report	SEA and AA Response
		upcoming Whole of Government Climate Action Plan.
	Future Amendments to the Plan You should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan.	Noted, and agreed. See above text which addresses this point.
	SEA Statement – “Information on the Decision” Once the Plan is adopted, you should prepare an SEA Statement that summarises: How environmental considerations have been integrated into the Plan; How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan; The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and, The measures decided upon to monitor the significant environmental effects of implementation of the Plan.	Noted, the SEA Statement will be prepared and issued upon adoption of the CCAP.
	You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.	Noted and agreed.
Dylan Potter , Geological Survey Ireland		
	Geoheritage Information provided on Geoheritage data.	
	Groundwater With regard to Flood Risk Management, there is a need to identify areas for integrated constructed wetlands. We recommend using the GSI’s National Aquifer and Recharge maps on our Map viewer to this end.	Noted, this will be highlighted in the SEA ER and Action 11 of the SDCC CCAP – Action 11 of the SDCC CCAP states: Integrated constructed wetlands for water attenuation and purification.
	Urban Geology As the proposed developments take place in an urbanized environment, we suggest looking at our Urban Geology section on our website. Geological Survey Ireland produces urban geoscience data on a project basis, informing the areas of soil geochemistry and contamination, 3D modelling of ground conditions, and assessing ground motions that	Noted-

	Submissions on the Environmental Report	SEA and AA Response
	<p>present a hazard to citizens in the urban environment. We also have a GeoUrban section to our Map Viewer which covers the Greater Dublin Area.</p> <p>Nature based solutions should be considered even in an urban environment. For example, an analysis of soil sealing could be done to determine levels of permeability in the Greater Dublin Area. We recommend using the GSI's Quaternary subsoil map and geotechnical database for this task.</p>	
	<p>Coastal Vulnerability</p> <p>Vulnerability of the coast is intimately correlated to its characteristics and the intricate physical processes that intervene on its evolution. Strategies for coastal protection should include information from local to regional coastal vulnerability and impact assessments. Geological Survey Ireland is undertaking a new coastal vulnerability to sea-level rise mapping initiative. The maps produced in this project will aim to identify the coastal regions most likely to be affected by impacts of sea-level rise by using a coastal Vulnerability index (CVI) approach. Areas of assessment will include getting up-to-date information on current state of coastal defences, records of areas of inundation during extreme events for validating models and access to quality controlled and publically available tide gauge records for Dublin Bay.</p> <p>Management strategies for adaptation should be flexible and centred on monitoring the most vulnerable areas. Monitoring short and long-term responses in soft cliffs, such as shoreline and sediment volumetric changes is key to understand coastal behaviour and to validate forecasting models. The current ESA (European Space Agency) funded coastal erosion project (Coastal Change from Space), which GSI is a partner will extensively look at some of these issues over the next two years (2019-2021). This project will provide an intertidal extent model and shoreline extraction tools, will monitor sediment change in the near shore using primarily satellite derived bathymetry, and quantify backshore to foreshore sediment volumetric change over the last 20 years for targeted areas.</p>	<p>Noted.</p> <p>Reference to this data, modelling and the Coastal Change for Space research project will be included in the SEA ER</p>

	Submissions on the Environmental Report	SEA and AA Response
Oonagh Duggan, BirdWatch Ireland		
	<p>5.0 Biodiversity Adaptation to Climate Change</p> <p>Ireland's draft Biodiversity Sectoral Climate Change Adaptation Plan⁸ which is subject to public consultation until April 17 2019 states that 'Irish biodiversity is highly vulnerable to the impacts of climate change and has a low adaptive capacity compared to other vulnerable sectors. Climate change has major indirect impacts on Irish biodiversity through its interaction with other stressors, in particular habitat fragmentation and loss; overexploitation; pollution of air, water and soil; and spread of invasive species'. We would encourage that the local authority or CARO would review the final national biodiversity action plan when it is completed to ensure coherence between plans for the Greater Dublin Area with the national biodiversity adaptation plan.</p>	<p>Noted, the SEA ER Chapter Three will reference the draft Biodiversity Sectoral Climate Change Adaptation Plan along with any other required updates.</p> <p>Chapter 4 of the SEA ER will restate this finding and highlight same as a key issue and challenge.</p>
	<p>6.0 Waterbirds and Sea Level Rise</p> <p>In 2013 BirdWatch Ireland published a report on the Impacts of Sea-level Rise on the Birds and Biodiversity of Key Coastal Wetlands⁹. The report assessed the level of risk posed to each of 52 waterbird species by increasing sealevels such that those risks are:</p> <ul style="list-style-type: none"> o high for species with wholly coastal species distributions and which rely on intertidal habitats (such as Shelduck <i>Tadorna Knot Calidris canutus</i> and Sanderling <i>Calidris alba</i>), to medium for species as above but that can feed in alternative locations, such as on grasslands (Light-bellied Brent Goose <i>Branta bernicla hrota</i>, Oystercatcher <i>Haematopus ostralegus</i> and Black-tailed Godwit <i>Limosa limosa</i>) and for those with predominantly coastal distributions but which are localised in Ireland (Greenland White-fronted Goose <i>Anser albifrons flavirostris</i> and Bewick's Swan <i>Cygnus columbianus bewickii</i>), and too low for other waterbirds whose distributions are not restricted to the coast (e.g. Teal <i>Anas crecca</i>, Golden Plover <i>Pluvialis apricaria</i> and Lapwing <i>Vanellus vanellus</i>) or which occur predominantly in deeper water (e.g. Red-throated Diver <i>Gavia stellata</i>, Great Crested Grebe <i>Podiceps cristatus</i>, Cormorant <i>Phalacrocorax carbo</i> and Common Scoter <i>Melanitta nigra</i>) 	<p>Noted.</p> <p>These comments will be included in the final SEA ER.</p> <p>The mitigation measure proposed in relation to retrofitting of housing and swifts is recommended for inclusion in the CCAP.</p>

	Submissions on the Environmental Report	SEA and AA Response
	<p>In addition, the report states that ‘Coastal sites are under increasing pressure from a range of anthropogenic sources such as human development, fisheries, aquaculture and human recreation. It is likely that these factors will operate cumulatively with the effects of climate change. There is an increasing need to understand the cumulative nature of pressures already operating at our coastal sites and to predict how this may be exacerbated by future sea-level rise’.</p> <p>Dublin Bay is the fourth most important site in the country for wintering waterbirds. It is critical that research is undertaken on the climate change impacts to waterbirds within Dublin City but also within the context of the Greater Dublin area where there is significant movement of species between wetlands.</p> <p>4. Internationally important migratory species such as Brent Geese can utilise the playing pitches including those of school grounds to forage when eel grass supplies have reduced at coastal sites. These areas are hugely important within a climate change adaptation scenario for Brent in the future and need to be secured.</p> <p>7.0 Breeding river birds</p> <p>Dublin’s rivers and associated habitats are known to contain breeding Annex 1 Kingfisher, Dipper, Grey Wagtail, and Sand Martin. In order to protect nest sites and to provide adaptation solutions under a changing climate but also within the context of any flood mitigation measures, BirdWatch Ireland recommends that further survey work is undertaken to determine where these birds are breeding so as to conserve and improve breeding sites and also to prepare an evidence-based report on appropriate adaptation measures for these important species. Ensuring that river ecosystems are healthy and support fish and insect populations stocks is also critical as these are food sources for these bird species.</p> <p>8.0 Breeding Swifts</p> <p>Within a climate change context, BirdWatch Ireland is concerned that with the potential for deep-retrofit, energy-saving projects that some Swift breeding sites may be lost due to construction work. It is really important that Swift breeding sites are investigated in Dublin and that any works to buildings with known breeding sites include actions such as insertion of ‘Swift bricks’ to provide alternative nesting sites for them. All new builds or deep retrofit programmes should also include Swift bricks in those projects. BirdWatch</p>	

	Submissions on the Environmental Report	SEA and AA Response
	Ireland's publication Saving Swifts is due out in 2019 and will help inform the conservation of Swifts in Ireland."	
	<p>9.1 The Natura Impact Report lists that the NIR for the East Midlands Regional Spatial and Economic Strategy (RSES) has been concluded and that there are no significant adverse impacts on the European sites in this area. However, the RSES has been re-opened for public consultation due to material developments which alter the original plan distributed for consultation. Further, these actions have been subject to Article 6.3 assessment, but the final plan has not been agreed.</p> <p>It is premature to state that as the NIR does that there are no impacts as the plan is not finalised since it is not clear if mitigation actions within the NIR will be incorporated into the final plan.</p>	<p>AA: The material amendments and reopening of the RSES is noted, and its status will be assessed as part of the updating to the draft CCAP, NIS and SEA ER.</p> <p>The Mitigation Actions within the NIS will be incorporated into the final plan.</p>
	<p>9.2 There is no mention of the requirements of Article 4(4) of the Birds Directive the second sentence of which states 'Outside these protection areas, Member States shall also strive to avoid pollution or deterioration of habitats'.</p> <p>There is no reference to the requirement that local authorities must strive to avoid the deterioration of the habitats of Annex 1 bird species found outside of European sites. In addition, it is important to recall that the Birds Directive also calls for protection of birds in the wider countryside (outside of SPAs) and this is detailed further in the NPWS Programme of Measures to address compliance issues in C-418/04.</p> <p>All efforts must be made to enforce the regulations to support birds in the wider countryside.</p>	Noted, this will be included in the SEA ER and the NIS.
	9.3 BirdWatch Ireland would like clarification on the statement in the NIR that there will be no significant adverse effects on the European sites when it is unclear whether the suggestions in Table 7.2 will be incorporated into the final plan. This element of doubt means that NIS is open to challenge. The suggested text is NOT in the draft climate action plan submitted for consultation. We would appreciate clarification of this.	Noted, for clarification the mitigation measures in Table 7.2 will be included in the final plan.

RECOMMENDED MITIGATION MEASURES FOR THE SOUTH DUBLIN CCAP – REVISED

These Mitigation Measures were identified in Section 7 of the Natura Impact Statement and Section 8 of the SEA ER and will also be included in the final SEA Environmental Report and AA Natura Impact Statement.

	<i>Mitigation Measure</i>	<i>Included in CCAP? Yes/ no</i>
	An integrated approach to decision making in relation to these climate change actions is recommended.	
	<i>Transport Actions</i>	
5	Strengthen traditional villages by improving the public realm through enhancement of green infrastructure measures and sustainable transport linkages	Yes
	<i>Flood Resilience</i>	
13	Develop template to capture impacts, response and costs (including ecosystem services/natural capital costs) for all major climate events	Yes
15	Update DLA urban drainage and flooding policies for current knowledge of flood risk and the latest best practice in drainage design promoting natural flood measures as a priority	Yes
20	Minor flood schemes and general maintenance that are designed and implemented to promote nature based solutions where practical	Yes
21	Communication and awareness campaigns on flood risk management and natural flood management measures	Yes
	<i>Nature Based Solutions</i>	

22	Include native species into local authority plans where appropriate as a key nature based measure where appropriate	Yes
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5.14 General Comments

5.14.1 Citizen and Community Engagement

A number of submissions request the need for additional public and citizen engagement across a range of climate change issues. Issues raised in submissions include: the need for more citizen information on grants, public advertisements, workshops on climate change, integration of climate change with educational curriculum and related funding, communication of climate change projects to the public, engagement with younger citizens, behavioural change campaigns, the need for diverse stakeholder engagement, links to international programmes, the need for climate change teams, summits and community development structures.

The Council recognises the importance of public and stakeholder engagement in addressing climate change. A number of Draft CCAP actions relate to citizen awareness and behavioural change campaigns. In recent months, there has been a range of citizen and community engagement initiatives carried out from national to local level. The Department of Communications, Climate Action and Environment has established the National Dialogue on Climate Action, to drive citizen engagement in climate action across Ireland. Co-ordinated by the EPA, the objectives of the National Dialogue on Climate Action are to:

- Create awareness, engagement and motivation to act (locally, regionally and nationally) in relation to the challenges presented by climate change;
- Create structures and information flows to facilitate people gathering to discuss, deliberate and maximise consensus on appropriate responses to these challenges, and to enable and empower appropriate action;
- Establish, on a long term basis, appropriate networks for people to meet periodically to consider evidence-based inputs on the economic, social, behavioural, environmental and public aspects of climate and energy policy; and
- Provide regular input, through the NDCA, into the prioritisation and implementation of climate and energy policy which can be reported and monitored at local/regional/national levels.

To date two regional NDCA workshops have been carried out, in Athlone (June 2018) and Tralee (November (2018)). A range of local and community initiatives have also been undertaken across the country, including Climate ambassadors, Green Schools, Eco Merit, ECO-UNESCO etc.

It is recognised that there is a need to foster and build momentum on wider citizen engagement in climate change, across all age groups. Local authorities have significant experience in engaging citizens through their existing functions, including land-use planning, housing, water quality, employment, transport and environmental efficiency. Local authorities are also engaged in existing public participation structures and approaches that are bottom-up, local community centred and are outcome focused. These include the Public Participation Networks, Local Community Development Committees (LCDP), Tidy Towns, Waters and Communities Office, Sustainable Energy Communities etc.

In implementing and updating the CCAP into the future, strengthening existing networks and creating new climate change links, should be maximised to encourage all citizens, communities and other stakeholders to have increased access to information and advice. Interest areas could include identification and implementation of relevant energy efficiency measures, renewable energy actions, climate adaptation and resilience measures, access to funding sources such as SEAI grant schemes, the Climate Action Fund etc.

Local authority efforts in citizen and community engagement should be supported by the Climate Action Regional Office, the Environmental Protection Agency and other relevant stakeholders. It is part of the CARO remit to engage and support the National Dialogue on Climate Action on a local and regional basis, and also to develop education and awareness initiatives for the public, professionals, schools, NGOs and other agencies engaged in driving the climate change agenda.

Having regard to the submissions made, it is considered that the Council, in collaboration with the Climate Action Regional Office and other relevant stakeholders should, enhance links with existing community participation structures and networks, to increase citizen engagement in climate change. It is also considered that information on the public information events undertaken during the public consultation of the Draft CCAP should be included as a case study in the Plan.

Chief Executive's Recommendation

It is recommended that the following amendment be made to the Draft CCAP as follows:

Under 'Public Awareness' section the following text shall be added:

The Council recognises the importance of public and stakeholder engagement in addressing climate change. In recent months, there has been a range of citizen and community engagement initiatives carried out from national to local level. The Department of Communications, Climate Action and Environment has established the National Dialogue on Climate Action, to drive citizen engagement in climate action across Ireland. Co-ordinated by the EPA, the objectives of the National Dialogue on Climate Action are to:

- **Create awareness, engagement and motivation to act (locally, regionally and nationally) in relation to the challenges presented by climate change;**
- **Create structures and information flows to facilitate people gathering to discuss, deliberate and maximise consensus on appropriate responses to these challenges, and to enable and empower appropriate action;**
- **Establish, on a long term basis, appropriate networks for people to meet periodically to consider evidence-based inputs on the economic, social, behavioural, environmental and public aspects of climate and energy policy; and**
- **Provide regular input, through the NDCA, into the prioritisation and implementation of climate and energy policy which can be reported and monitored at local/regional/national levels.**

To date two regional NDCA workshops have been carried out, in Athlone (June 2018) and Tralee (November (2018)). Separate to the NDCA, a range of local and community initiatives have also been undertaken across the country, including Climate ambassadors, Green Schools, Eco Merit, ECO-UNESCO etc.

It is recognised that there is a need to foster and build momentum on wider citizen engagement in climate change, across all age groups. Local authorities have significant experience in engaging citizens through their existing functions, including land-use planning, housing, employment, transport and environmental efficiency. Local authorities are also engaged in existing public participation structures and approaches that are bottom-up, local community centred and are outcome focused. These include the Public Participation Networks, Local Community Development Committees (LCDP), Tidy Towns, Sustainable Energy Communities etc.

Younger citizens have also engaged with the climate change agenda by participating in the #FridaysForFuture campaign, including rallies outside Government buildings. The Council aims to develop further links with younger citizens in enhancing climate change awareness and developing educational initiatives in partnership with schools, and youth organisations such as Comhairle na nÓg and Foróige.

In implementing and updating the CCAP into the future, strengthening existing networks and creating new climate change links, should be maximised to encourage all citizens, communities and other stakeholders to have increased access to information and advice. Interest areas could include identification and implementation of relevant energy efficiency measures, renewable energy actions, climate adaptation and resilience measures, access to funding sources such as SEAI grant schemes, the Climate Action Fund etc.

Local authority efforts in citizen and community engagement should be supported by the Climate Action Regional Office, the Environmental Protection Agency and other relevant stakeholders. It is part of the CARO remit to engage and support the National Dialogue on Climate Action on a local and regional basis, and also to develop education and awareness initiatives for the public, professionals, schools, NGOs and other agencies engaged in driving the climate change agenda.

Insert #Councils4Climate Action case study text based on outcomes of public consultation events.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.14.2 CCAP development and CCAP Targets

Submissions relate to the methodology for the CCAP development and how the targets were established. The National Adaptation Framework (NAF) was published in January 2018. This sets out the national strategy to reduce the vulnerability of the country to the negative effects of climate change and to avail of positive impacts. The NAF was developed under the Climate Action and Low Carbon Development Act 2015. The NAF outlines a whole of government and society approach to climate adaptation in Ireland. Under the NAF a number of Government Departments are required to prepare sectoral adaptation plans in relation to a priority area for which they are responsible. Under the NAF, each Local Authority is also required to make a local adaptation strategy by 30th September 2019. Accordingly, each of the four Dublin local authority has prepared a Draft Climate Change Action Plan, which will be approved by the Council, and submitted to the Department of Communications, Climate Action and Environment.

With regard to CCAP targets, it is noted that the Draft CCAP has been prepared to address the following specific climate change targets:

- A 33% improvement in the Council's energy efficiency by 2020; and
- A 40% reduction in the Council's greenhouse gas emissions by 2030.

In Ireland, the public sector has mandatory energy efficiency targets. It is set in the context of Ireland's EU and national commitments and wider climate change goals, whereby a target of 33% energy efficiency improvement is to be achieved by all Irish public bodies (as defined in Statutory Instrument 426 of 2014) by 2020. Public bodies are required to report annual energy efficiency data to the Sustainable Energy Authority of Ireland (SEAI) which manages the reporting process on behalf of the Department of Communications, Climate Action and Environment (DCCAE). There is currently no statutory requirement to undertake sectoral mitigation plans, including revised sectoral, local authority emissions reductions targets.

Being a signatory to the EU Covenant of Mayors for Climate & Energy, the Council has voluntarily committed to a 40% reduction in the Council's greenhouse gas emissions by 2030. Across Europe, signatory cities pledge action to support implementation of the EU 40% greenhouse gas-reduction target by 2030 and the adoption of a joint approach to tackling mitigation and adaptation to climate change.

It is considered that methodology for the CCAP development and how the targets were established is adequately addressed in the Draft Plan.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the Draft CCAP.

5.14.3 Climate Change Science behind CCAP

A number of submissions relate to the science and evidence base behind climate change and the Draft CCAP. The Draft CCAP Introduction outlines the policy and legislative context under which the Plan has been prepared. At an international level, the Plan has been prepared in line with the Conference of the Parties (COP21) Paris Agreement. This legally binding, global agreement sets out a long-term goal to put the world on track to limit global warming to well below 2 degrees centigrade above pre-industrial levels, and to pursue efforts to limit the temperature increase to 1.5 degrees. The Draft CCAP has also been prepared to respond to the findings of the Intergovernmental Panel on Climate Change (IPCC) Report on Global Warming of 1.5 °C, published in October 2018. At a national level the Draft CCAP has been prepared in accordance with relevant national legislation and policy including the Climate Action and Low Carbon Development Act 2015, National Mitigation Plan and National Adaptation Framework and Project Ireland 2040. The Draft Plan has also been prepared in accordance with the Local Authority Adaptation Strategy Development Guidelines, published in December 2018.

To inform the Action Areas, the Draft CCAP includes detailed climate change adaptation and baselines. The adaptation baseline has been prepared using a variety of sources, in particular Met Éireann data the Council's own extreme weather events records. This robust evidence based informed the future

risk matrix included in the Draft CCAP. The mitigation baseline has been prepared using the Council's own energy consumption data, which is used to undertake the annual Sustainable Energy Authority of Ireland (SEAI) Monitoring & Reporting (M&R).

On this basis, and having regard to submissions received relating to the science and evidence based behind climate change, it is considered that the Draft CCAP has been prepared have regard to the appropriate and consensus based policy, legislative and baseline information.

In November 2018, the Minister for Communications, Climate Action and Environment, received a mandate from Government to begin the preparation of a new Whole of Government Climate Action Plan in responding to climate change. It is intended that this new Plan will set out the actions which must be taken to make Ireland a leader in responding to climate change. It is anticipated that the All of Government Plan will have a strong focus on implementation, including actions with timelines and steps needed to achieve actions, assigning clear lines of responsibility for delivery.

The Whole of Government Plan will build on existing policy and will be organised around six themes that focus action across Government in all sectors of the economy that contribute to greenhouse gas emissions. These key themes include:

- Framework conditions;
- Adoption of known technologies;
- Addressing market failure;
- Driving change in business models;
- Public sector leading by example; and
- Promoting behavioural change (harnessing the citizen and community effort)

In March 2019, the Oireachtas published its 'Climate Change: a cross-party consensus on climate action' report. This report was informed by the 2017 Citizens' Assembly report, which highlighted a strong desire on the part of citizens for the State to take far more ambitious actions to make Ireland a leader in tackling climate change. The cross-party report includes a range of actions that if implemented in a co-ordinated manner can deliver a substantive and sustained response to climate change and reduction in Ireland's greenhouse gas emissions. The actions in the report are grouped under the following themes:

- Governance,
- Supporting a Just Transition
- Citizen and community engagement
- Education and Communication
- Opportunities
- Incentivising Climate Change
- Energy
- Agriculture, Forestry and Peatlands
- Built Environment; and
- Transport

It is considered that the implementation, monitoring and future updates of the Climate Change Action Plan should be consistent with and have regard to the actions and recommendations of the Oireachtas 'Climate Change: a cross-party consensus on climate action' report and the Whole of Government Climate Action Plan.

Chief Executive's Recommendation

It is recommended that the following amendment be made to the Draft CCAP as follows:

Under The National Context – Ireland section the following text shall be added:

The implementation, monitoring and future updates of the Climate Change Action Plan will be consistent with, and have regard to the Oireachtas 'Climate Change: a cross-party consensus on climate action' report (March 2019) and the Whole of Government Climate Action Plan.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the Draft CCAP.

5.14.4 CCAP implementation

Submissions relate to open and transparent implementation of the CCAP to 2030, assessment of climate actions, the need for measurable and time-bound actions, short to long term implementation of actions and the need for immediate action on climate change.

Milestone 4 of the Draft CCAP relates to Implementation.

The CCAP includes a range of climate actions across the five theme areas of Energy & Buildings, Transport, Flood Resilience, Nature Based Solutions and Resource Management. Having regard to submissions received, it is noted that the timescale for action implementation and the Council department responsible, is also indicated in the CCAP. Actions are to be implemented by the Council in the short, medium and longer term.

The Council has established a cross-departmental Climate Team who will be responsible for implementing the actions included in the CCAP. The development and implementation of CCAP actions will be supported by both Codema and the Dublin Climate Action Regional Office. Codema will provide ongoing support to the CCAP in the areas of research, planning, technical assessment, cost benefit analysis, procurement, project management, funding applications and communications. The Dublin CARO will work with all four Dublin local authorities in implementing CCAP actions, including developing research opportunities and pilot project across the four Dublin local authorities. The CARO will also have a role in reviewing action implementation across the four Dublin local authority CCAPs.

In implementing the CCAP, the Council will adhere to current best practice guidelines in this area, including The Covenant of Mayors for Climate and Energy Reporting Guidelines. This includes monitoring actions with regard to staff resourcing, action budget allocation, stakeholder and citizen engagement, CO2 emissions reduction etc.

It is considered that the implementation of the CCAP is adequately addressed in the Draft Plan.

Implementation Timescales and Monitoring of Actions

Submissions relate to implementation timescale to 2030, the need to ensure energy target monitoring and compliance, measurable and time-bound actions, clarity regarding baselines and the need for quality data analytics

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the Draft CCAP.

5.14.5 CCAP Future Iterations

With regard to submissions received on future iterations of the CCAP; the CCAP will be updated on an annual basis, with a review and revision every five years. At each revision the updated CCAP will take account of demographic, technical and other changes that have occurred and any new targets that have been introduced. As the Council is a signatory to the EU Covenant of Mayors for Energy and Climate, this CCAP will be submitted to the Covenant to fulfil participation protocols. This commitment initiates the beginning of a long term process, whereby the Council will be committed to reporting every two years to the Covenant of Mayors, on the implementation progress of the Plan. Participation in the Covenant of Mayors will also facilitate access to best practice project and benchmarks of excellence initiatives across Europe.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the Draft CCAP.

5.14.6 Developing best practice in climate change

Submissions relate to developing best practice in climate change. In implementing and monitoring the CCAP, the Council will adhere to current best practice guidelines in this area, namely '*The Covenant of Mayors for Climate and Energy Reporting Guidelines*'. This includes monitoring actions with regard to

staff resourcing, action budget allocation, stakeholder and citizen engagement, CO2 emissions reduction etc.

Having regard to submissions received, it is considered that these matters are adequately address in the Draft CCAP.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the Draft CCAP.

5.14.7 Wider Climate Change Agenda and Urban Sustainability

A number of submissions relate to the interaction between the Draft CCAP, climate change, wider sustainability issues and the need for a holistic and integrated approach to the development of the County as an evolving urban environment. Submissions outline the need for a local authority wide approach to climate change, quality of life including well-being and mental health, the various needs of Dublin citizens, the need for a partnership approach between sectors, the role of younger citizens, family life cycle, human rights and climate justice.

The Draft CCAP has been prepared to demonstrate the Council's commitment to addressing climate change across its own buildings, facilities and operations. The action areas in the Draft CCAP have been organised into the five key areas of Energy & Buildings, Transport, Flood Resilience, Nature Based Solutions and Resource Management. These areas reflect the Council's primary remit, with the aim of fostering greater collaboration across various Council departments. It is the aim of the Council to develop and implement actions that can be replicated by citizens, businesses, and other stakeholders. It is the aim of Council to contribute to the wider sustainable development of the County, by informing and updating citizens through CCAP actions that raise awareness of climate issues and solutions, that will facilitate wider projects and initiatives that contribute towards County-wide greenhouse gas emissions reduction and enhancing resilience to the impacts of climate change. This strategic approach will be of benefit to all citizens, wildlife and biodiversity in Dublin.

With regard to the wider holistic development of the County, it is noted that the CCAP will be reflected in a range of other plans and strategies made and adopted by the Council into the future, including the County Development Plan, Corporate Plan, Local Economic and Community Plan (LECP) etc. These plans provide an opportunity for further integration of climate change action across Dublin and the enhancement of a cross- sectoral approach to building the sustainability of the County for future generations.

It is considered that the submissions pertaining to interaction between the Draft CCAP, the climate change agenda and wider sustainability issues are adequately addressed in the Draft Plan.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the Draft CCAP.

5.14.8 Partnership and Collaboration with Local Authorities

Submissions were received relating to wider engagement between local authorities internal and external to the Dublin region.

Regarding ongoing engagement between local authorities internal and external to the Dublin region, it is noted that the development and implementation of the CCAP, will be supported by both Codema and the Dublin Climate Action Regional Office, which involve interaction between the four Dublin local authorities. Codema will provide ongoing support to the CCAP in the areas of research, planning, technical assessment, cost benefit analysis, procurement, project management, funding applications and communications. The Dublin CARO will work with all four Dublin local authorities in implementing CCAP actions, including developing research opportunities and pilot project across the four Dublin local authorities. The CARO will also have a role in reviewing action implementation across the four Dublin local authority CCAPs. There are a number of other regional structures such as the Eastern & Midland Regional Assembly (EMRA), Eastern - Midlands Waste Regional Office and the Local Authority Waters Programme whereby ongoing engagement with other local authorities on climate change issues can be facilitated.

Chief Executive's Recommendation

It is recommended that a new action be added to the CCAP to reflect the role of the Local Authority Waters Programme.

New Action: **The Local Authority will work with the Local Authority Waters Programme in its support of communities and stakeholders in the delivery of local water quality projects and initiatives.**

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the Draft CCAP.

5.14.9 Partnership and Collaboration with the Business Community

Submissions relate to the meaningful role of the business community in addressing climate change namely plans for business engagement, Council leadership in the business sustainability agenda, the role of climate change and increasing interest from the business sector including Foreign Direct Investment.

Chief Executive's Recommendation

It is recommended that the following text be added to the Draft CCAP as follows:

The Council recognises the role of the business community in addressing climate change. In implementing and updating the CCAP into the future, the Council will engage with the business community and relevant bodies such as the Chamber of Commerce, Local Enterprise Office etc. This can include strengthening existing networks and creating new climate change links, to encourage all business community stakeholders to engage with climate change action and enhance existing projects and initiatives. Interest areas could include energy efficiency measures, renewable energy opportunities, climate adaptation and resilience measures, access to funding sources etc. There is also scope to further explore partnerships across sectors to facilitate climate action project delivery.

It is recommended that the following action be added to the Draft CCAP as follows:

New Action: The Local Authority will strengthen existing networks and creating new climate change links, to encourage all business community stakeholders to engage with climate change action and enhance existing projects and initiatives. Interest areas could include energy efficiency measures, renewable energy opportunities, climate adaptation and resilience measures, access to funding sources etc.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the Draft CCAP.

5.14.10 Local authorities as leaders in action on Climate Change

Submissions relate to leadership of the public sector and local authorities. It is the function of the Draft CCAP to outline actions that will directly improve the Council's own energy efficiency and reduce greenhouse gas emissions in its own buildings and operations, and Council led actions that aim to make Dublin a more climate resilient County. The Draft Plan includes a range of ongoing and planned actions, across Council departments, including actions relating to renewable energy projects. Having regard to supporting other renewable energy projects including hydropower, solar etc., these are primarily supported by the Council, by way of the policies and objectives included in the County Development Plan and other plans and strategies.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the Draft CCAP.

5.14.11 Review of Energy Targets

A number of submissions request a review of energy targets to be included in the Draft CCAP. The Draft CCAP has been prepared to address the following specific climate change targets:

- A 33% improvement in the Council's energy efficiency by 2020; and
- A 40% reduction in the Council's greenhouse gas emissions by 2030.

In Ireland, the public sector has mandatory energy efficiency targets. It is set in the context of Ireland's EU and national commitments and wider climate change goals, whereby a target of 33% energy efficiency improvement is to be achieved by all Irish public bodies (as defined in Statutory Instrument 426 of 2014) by 2020. Public bodies are required to report annual energy efficiency data to the Sustainable Energy Authority of Ireland (SEAI) which manages the reporting process on behalf of the Department of Communications, Climate Action and Environment (DCCAE). There is currently no statutory requirement to undertake sectoral mitigation plans, including revised sectoral, local authority emissions reductions targets.

Being a signatory to the EU Covenant of Mayors for Climate & Energy, the Council has voluntarily committed to a 40% reduction in the Council's greenhouse gas emissions by 2030. Across Europe, signatory cities pledge action to support implementation of the EU 40% greenhouse gas-reduction target by 2030 and the adoption of a joint approach to tackling mitigation and adaptation to climate change.

The Government has published the Draft National Energy & Climate Plan 2021-2030. This first draft of the NECP takes into account energy and climate policies developed to date, the levels of demographic and economic growth identified in the Project 2040 process and includes all of the climate and energy measures set out in the National Development Plan 2018-2027. It is the first step in the process of putting together the final National Energy and Climate Plan and further iterations of the plan will take into account additional policies and measures and the all-of-Government climate action plan to be completed in 2019. A final version of the NECP will be submitted to the European Commission by 31st December 2019.

In March 2019, the Oireachtas published its 'Climate Change: a cross-party consensus on climate action' report. The report recommends that new legislation be enacted by the Oireachtas, providing a new legal framework for tackling climate change. The report states that this should include the setting of legally binding GHG emissions targets for mitigation and renewable electricity for 2030 and

2050, reflecting the latest IPCC consensus and the need for Ireland to make immediate progress in meeting existing EU emissions reductions 2030 targets.

The Climate Action and Low Carbon Development Act 2015 and National Adaptation Framework require sectoral adaptation/climate change action plans to be submitted to Government for approval by 30th September 2019. The Climate Action and Low Carbon Development Act 2015, National Mitigation Plan and National Adaptation Framework, do not require additional public sector climate change targets to be implemented.

In summary, local authorities in Ireland have no statutory role in setting energy and climate change targets. It is considered that the identification of additional local authority energy and climate change targets is not appropriate at this stage, is pre-mature in advance of any revised national legislation in this regard, and; therefore, should not be included in the Draft CCAP. This matter should be primarily addressed at a national level, in advance of addressing such issues at a local authority level.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.14.12 Addressing climate change in other sectors

With regard to submission addressing climate change in other sectors, it is the function of the Draft CCAP to outline actions that will directly improve the Council's own energy efficiency and reduce greenhouse gas emissions in its own buildings and operations, and Council led actions that aim to make South Dublin a more climate resilient County. In this regard, the Draft CCAP includes Action Areas across five thematic areas: Energy & Buildings, Transport, Flood Resilience, Nature Based Solutions and Resource Management. The Draft Plan includes a range of ongoing and planned actions, across Council departments, that will be continuously monitored, evaluated and updated to 2030 and beyond, with the support of Codema, the Dublin Climate Action Regional Office and other relevant stakeholders. Where relevant and appropriate, the actions in the Plan also have the scope to be replicated across other sectors, including the private sector. This is dealt with adequately in the plan.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.14.13 Wider climate change reports

Submissions relating to wider climate change reports are noted. At each revision of the CCAP, the updated Plan will take account of demographic, technical and other changes that have occurred and any new targets that have been introduced; this will include having regard to wider climate change reports and publications, as relevant and appropriate.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.14.14 Health Effects of Climate Change Actions

A submission was received recommending that the Council begin supporting research in the area of mental health and climate change. The Council does not have a role in this area. The Department of Health through various government programmes (e.g. Healthy Ireland) is responsible for the provision of healthcare services and health related research.

Many of the actions identified in the CCAP give rise to long term positive effects on population and human health both by responding and adapting to the impacts of climate change, and also reducing greenhouse gas emissions through a series of measures (e.g. undertakings in the areas of biodiversity, flood resilience, transportation planning and support of the sustainability agenda) are envisioned to have a positive effect on health.

Additionally, under the National Adaptation Framework, a sectoral adaptation plan on health will be prepared by the Department of Health by 30th September 2019. The implementation and future iterations of the Climate Change Action Plan will be consistent with all approved sectoral adaptation plans and the local authority will work in partnership with the Department of Health to achieve and deliver the sectoral plan.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.14.15 Energy Performance of Public/Private Buildings

A number of submissions request the Council to have further remit in addressing the energy performance and design criteria of non-public sector buildings, including private residential, commercial and industrial buildings. It is noted that the energy efficiency and renewable energy requirements for the construction of new homes and non-residential buildings are primarily addressed in the current Building Regulations Part L and the nearly Zero Energy Buildings (nZEB) standard. The European Energy Performance of Buildings Directive Recast 2010 (EPBD) requires all new buildings to be nearly Zero Energy Buildings (nZEB) by 31st December 2020, and all buildings acquired by public bodies by 31st December 2018. Regarding non-residential buildings, all buildings are required to use up to 60% less energy than allowed under current regulations, plus a requirement for up to 20% of this final demand to be met with renewables, including solar. With regard to residential buildings, any dwelling receiving planning permission after 1st April 2019, should meet the nZEB standard. Substantial completion must have been achieved by 1st April 2020. After 2020 all homes irrespective of when they received planning permission should achieve the new standard. Accordingly, it is not within the remit of the Draft CCAP to introduce additional building standards that would serve to duplicate or exceed the requirements of the European Energy Performance of Buildings Directive.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.14.16 Interaction with Sectoral Climate Change Issues

A number of submissions relate to the need for the Draft CCAP to interact with a number of wider and sectoral climate change issues i.e. cultural heritage, energy infrastructure, transport etc. Under the National Adaptation Framework, sectoral adaptation plans are required to be prepared and submitted to the Government for approval, by 30th September 2019. Adaptation plans will be prepared for the following sectors:

- Seafood - Department of Agriculture, Food and the Marine

- Agriculture - Department of Agriculture, Food and the Marine
- Forestry - Department of Agriculture, Food and the Marine
- Biodiversity - Department of Culture, Heritage and the Gaeltacht
- Built and Archaeological Heritage - Department of Culture, Heritage and the Gaeltacht
- Transport infrastructure - Department of Transport, Tourism and Sport
- Electricity and Gas Networks - Department of Communications, Climate Action and Environment
- Communications networks - Department of Communications, Climate Action and Environment
- Flood Risk Management - Office of Public Works
- Water Quality - Department of Housing, Planning and Local Government
- Water Services Infrastructure - Department of Housing, Planning and Local Government
- Health - Department of Health

As the Draft CCAP will be adopted by the elected members in advance of the finalisation of approval of all twelve sectoral adaptation strategies, it is considered that narrative be included in the Draft CCAPs regarding the role of sectoral adaptation plans and the role that local authorities play in collaborating and working in partnership with sectors to achieve and deliver the sectoral plans, given their common and shared agenda. It is also considered that an additional action be included in the Draft Plan in this regard.

Chief Executive's Recommendation

It is recommended that the following amendment be made to the Draft CCAP as follows:

Under The National Context – Ireland section the following text shall be added:

Under the National Adaptation Framework, sectoral adaptation plans are required to be prepared and submitted to the Government for approval, by 30th September 2019. Adaptation plans will be prepared for the following sectors:

- **Seafood - Department of Agriculture, Food and the Marine**
- **Agriculture - Department of Agriculture, Food and the Marine**
- **Forestry - Department of Agriculture, Food and the Marine**
- **Biodiversity - Department of Culture, Heritage and the Gaeltacht**
- **Built and Archaeological Heritage - Department of Culture, Heritage and the Gaeltacht**
- **Transport infrastructure - Department of Transport, Tourism and Sport**
- **Electricity and Gas Networks - Department of Communications, Climate Action and Environment**
- **Communications networks - Department of Communications, Climate Action and Environment**
- **Flood Risk Management - Office of Public Works**
- **Water Quality - Department of Housing, Planning and Local Government**
- **Water Services Infrastructure - Department of Housing, Planning and Local Government**
- **Health - Department of Health**

The implementation and future iterations of the Climate Change Action Plan will be consistent with approved sectoral adaptation plans and the local authority will work in partnership with sectors to achieve and deliver the sectoral plans.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.14.17 Public Consultation Process and Duration

A number of submissions relate to the public consultation process and duration; these submissions are noted. It is recommended that no amendments are made to the Draft CCAP.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.14.18 Carbon Tax

A number of submissions raise the issue of Carbon tax. Ireland applies a carbon tax of €20 per tonne of carbon emitted through the direct use of fossil fuels - oil, petrol, diesel and gas in heating homes and businesses or running cars and trucks. The Irish Government decided not to increase the level of the carbon tax in the 2019 Budget. Ireland is also part of the EU Emission Trading System (ETS), a cap and trade system that sets an overall cap on emissions from power stations and industrial plants throughout the EU. Each power station or industrial plant in the EU receives a number of free emissions credits. They must either stay within their allocation or else purchase credits from other facilities, effectively buying compliance. This incentivises operators to reduce emissions.

It is noted that the Oireachtas 'Climate Change: a cross-party consensus on climate action' report states that the current carbon tax level in Ireland does not send a powerful enough signal to actors to lower emissions throughout the economy, the Oireachtas Committee report also states that a rising price trajectory to 2030 should form a component of climate action policy moving forward.

This issue is considered outside the scope of the Draft CCAP and therefore cannot be addressed by this process.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.14.19 Directly Elected Mayor

A number of submissions relating to the impact of actions on climate change as a result of having a directly elected mayor were received.

The Local Government Reform Act 2014 includes for the provision for a 'Directly Elected Mayor for Dublin Metropolitan Area'. The issue of a directly elected Mayor for Dublin has been referred to the Citizen's Assembly for consideration in 2019. Issues relating to the election of Directly Elected Mayor include devolution of powers, interaction with national agencies, wider governance structure etc. This issue is considered outside the scope of the Draft CCAP and therefore cannot be addressed by this process.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.14.20 Climate Refugees

Submissions raised in relation to Climate Refugees are a matter for the Department of Foreign Affairs and are not within the remit of the Council.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.14.21 Friends of the Irish Environment v the Irish Government

Submissions raised in relation to the court case Friends of the Irish Environment v the Irish Government are not within the remit of the Council.

Chief Executive's Recommendation

It is recommended that no amendments are made to the Draft CCAP.

SEA Comment

No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

AA Comment

The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the CCAP.

5.14.22 Minor Text Changes

The Chief Executive recommends a number of minor text changes to the Draft CCAP. These include correction of typographical errors, clarifications, changes to Departments responsible for actions and references. These minor text changes include:

Chief Executive's Recommendation:

It is recommended that some minor text updates be included.

Flood Resilience Section

Flooding is a key climate change risk facing the Dublin Region. Climate change **is expected to increase** the frequency **and/or** intensity of heavy rainfall events and storm surges, which **would** increase the risk of pluvial, fluvial and coastal flooding in vulnerable areas of the County. Extreme rainfall and weather events can also place additional pressure on the urban drainage network and water supply, which can result in network flooding and water shortages. Together with the Office of Public Works (OPW) and neighbouring local authorities, DCC is actively working to implement projects and programmes that align with the EU Floods Directive and Water Framework Directive. **The Floods Directive calls** for member states to undertake strategic flood risk assessments and to **identify flood risk management measures. Flood maps have been prepared for future climate scenarios, and the proposed community-scale measures are set out in the Flood Risk Management Plans (www.floodinfo.ie). Additional local measures can include** nature-based solutions such as integrated

wetlands, green infrastructure, and Sustainable urban Drainage Systems (SuDS,) to be used for adaptation and mitigation responses to achieve flood resilience.

References Section

- OPW's website www.floodinfo.ie, which is a useful public information source for assessing current and future scenarios flood risk.
- OPW flood maps for both current and future climate change scenarios.

Flood Resilience Table

Include full title to the planning guidelines, i.e. " **The Planning Systems and Flood Risk Management Guidelines for Planning Authorities, November 2009**" (Please note that the Guidelines were published by DECLG (now DHPLG) along with the OPW).

5.15 Summary of Chief Executive's Proposed Amendments

South Dublin County Council undertook a public consultation on the Draft Climate Change Action Plan 2019-2024 (CCAP) during the period Monday 11th February to Monday 25th March 2019 inclusive. A total of 73 valid submissions were received in response to the Consultation which translated into over 246 discrete comments or item submissions on the Plan. A Chief Executive's Report has subsequently been prepared which summarises and details the outcome of this public consultation programme.

The level and detail of submissions received reflect widespread public concern on the urgent need to respond to climate change. South Dublin County Council is determined to do all within its power to improve energy efficiency and reduce greenhouse gas emissions. This involves working on its own buildings and operations, whilst also influencing the wider community, other public bodies and businesses. It further requires making the South Dublin County Council area more adaptive to the impacts of climate change.

There were 114 actions in the Draft Climate Change Action Plan; a further 17 have been added as a result of submissions whilst another 8 have been amended. The attached table summarises the new and amended actions.

In accordance with the National Adaptation Framework (NAF) South Dublin County Council is required to make a local adaptation strategy by the 30th September 2019

The Chief Executive Report, together with the Draft CCAP, will be circulated to the Environment, Public Realm and Climate Change SPC members and will be included on the Agenda of the Council meeting of the 7th May. If the Draft is approved, a final Climate Change Action Plan 2019-2024 will be published and submitted to the Minister for Communications, Climate Action and Environment.

Section	Action Number	Amended Text/New Action	Text Description
Energy and Buildings	20	New	The Council Energy Review (mid 2019) and going forward, will include a glide path illustrating the energy efficiency and GHG emission targets for the Council up to and including 2030.
	21	New	Appendix II: Total Emissions in South Dublin of the CCAP, will also be updated every two years in accordance with EU Covenant of Mayors for Climate & Energy protocol.
	<p><u>SEA comment:</u> These two actions as recommend will provide information on the energy efficiency and targets through diagrams (glide path) as well as biannual updates of total emissions. These in and of themselves do not give rise to landuse effects. No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.</p> <p><u>Appropriate Assessment Comment:</u> These two actions as recommend will provide information on the energy efficiency and targets through diagrams (glide path) as well as biannual updates of total emissions. These in and of themselves do not give rise to landuse effects and will not have the potential alone, or in combination with other plans or projects, to result in likely significant effects to European Sites.</p>		
	22	New	The Architects Department of South Dublin County Council is committed to participating with the RIAI in particular the Sustainability Task Force in seeking new and innovative approaches to Climate action in the built environment
	23	New	Identify site for trialling renewable energy projects, including solar PV and Geothermal.
	24	New	The Council will investigate the Lifecycle Assessment of Traditional and New Construction Methods for Residential Projects in Dublin.
	25	New	In all building projects, new build or retrofit, Swift Bricks or other nesting sites for swifts will be provided where practicable. The presence of swift breeding sites will be identified to ensure that known breeding sites are not lost as a result of construction work.
	26	New	Develop maintenance and condition survey programmes for Council owned historic and ancient monuments that are informed by climate change impacts.
	27	New	Conduct research and seek to develop Council based case studies on appropriate and sensitive retro-fitting/energy upgrading of traditional buildings to inform works both to Council owned properties and to guide private owners.
	<p><u>Strategic Environmental Assessment of Chief Executive's Recommendation</u> Actions relating to long term building renovation and new and innovative climate action in the built environment are consistent with a number of SEOs in</p>		

	<p>particular, material assets, climate change and air quality, population and human health as well as indirect positive effects in relation to cultural heritage and landscape.</p> <p>The identification of new sites for trialling renewable energy projects such as geothermal should utilise the GIS data in particular. Existing measures in the South Dublin CDP, the CCAP, SEA ER and NIS will also apply. Subject to full implementation as appropriate, no adverse environmental effects are identified.</p> <p>The action relating to Swift Boxes is included on foot of a submission by Birdwatch Ireland. Positive effects in particular in relation to Biodiversity SEOS and no significant environmental effects are identified for this CE recommendation.</p> <p><u>Appropriate Assessment Screening of Chief Executive’s Recommendation</u></p> <p>Actions relating to long term building renovation and new and innovative climate action in the built environment within South Dublin will not result in land use effects with the potential to negatively affect European Sites. The renovation of existing buildings will not have the potential alone, or in combination with other plans or projects, to result in likely significant effects to European Sites.</p> <p>The identification of site for trialling renewable energy projects such as solar PV and geothermal will not in itself have the potential to result in likely significant effects to European Sites. It is noted that any renewable energy project progressed within any such site identified on foot of this amendment will be subject to screening for Appropriate Assessment and where required a Natura Impact Statement. In addition existing measures that aim to protect European Sites as outlined in the NIS for the CCAP and the NIR for the CDP will be required to inform the site identification process.</p> <p>The action relating to swift boxes is included on foot of a submission by Birdwatch Ireland. It will have positive implications for biodiversity and will not have the potential alone, or in combination with other plans or projects, to result in likely significant effects to European Sites.</p>		
Transport	17	Amend	Expand availability of EV charging points and other facilities for non fossil fuelled powered vehicles in the County
	<p>SEA Comment: This action relates to minor landuse effect. No significant environmental effects are identified for this CE recommendation and expansion of non fossil fuel vehicles availability is consistent with SEOs around material assets, climate change and human health.</p> <p>Appropriate Assessment comment: The inclusion of this action will not in itself result in significant land use effects and will not have the potential alone, or in combination with other plans or projects, to result in likely significant effects to European Sites.</p>		
	5	Amend	Strengthen traditional villages by improving the public realm through enhancement of green infrastructure measures and sustainable transport linkages
	<p>SEA and AA Comment: This action was assessed during draft plan and was recommended for mitigation to enhance environmental performance.</p>		

	18	New	SDCC participates in the national Cycle Right programme bringing cycle training to pupils in primary and secondary schools throughout the city area. SDCC works closely with An Taisce Green Schools on the Green Travel theme and encourages increased cycling through support for cycle training, on site cycle parking and improvements to the physical environment identified by pupils. Cycle Training Programme for 6th Class students / Pedal Power Labs
	19	New	SDCC will continue to seek new and expand on existing partnerships to encourage sustainable travel and safer travel behaviours.
	20	New	SDCC will establish a portal dedicated to communication and promotion of active travel within existing platforms
<p>SEA Comment Positive interactions with SEOS identified for all the above actions, in particular with material assets, climate change, population and human health SEOs.</p> <p>AA Comment The inclusion of these actions will not in itself result in land use effects and will not have the potential alone, or in combination with other plans or projects, to result in likely significant effects to European Sites.</p>			
	21	New	SDCC will engage with local communities to develop a vision for the future of their neighbourhoods with a strong focus on local living, sustainable mobility and quality of life
<p>SEA Comment The above action supports engagement communication and collaboration and this is consistent with a number of SEOS including population and human health, climate change and material assets.</p> <p>AA Comment The inclusion of this action will not in itself result in land use effects and will not have the potential alone, or in combination with other plans or projects, to result in likely significant effects to European Sites.</p>			
	22	New	The Council will undertake an assessment of the number of existing and potential future Electric Vehicle Charge points in its jurisdiction.
<p>SEA Comment: This action relates to an assessment only and no landuse effects are identified. No interaction with Strategic Environmental Objectives currently and no significant environmental effects are identified for this CE recommendation.</p> <p>Appropriate Assessment comment: The inclusion of this action will not in itself result in land use effects and will not have the potential alone, or in combination with other plans or projects, to result in likely significant effects to European Sites.</p>			

Flood Resilience	13	Amend	Develop template to capture impacts, response and costs (including ecosystem services/natural capital costs) for all major climate events
	15	Amend	Update DLA urban drainage and flooding policies for current knowledge of flood risk and the latest best practice in drainage design promoting natural flood measures as a priority
	20	Amend	Minor flood schemes and general maintenance that are designed and implemented to promote nature based solutions where practical
	21	Amend	Communication and awareness campaigns on flood risk management and natural flood management measures
SEA and AA comment: The above actions were assessed during draft plan preparation and were recommended for mitigation to enhance environmental performance.			
Nature Based Solutions	22	Amend	Include native species into local authority plans where appropriate as a key nature based measure where appropriate
SEA and AA comment: The above actions were assessed during draft plan preparation and were recommended for mitigation to enhance environmental performance.			
Resource Management	9	Amend	Promote programmes to advise businesses on reducing waste e.g. Eco-Merit
	24	New	Promote recycling and the circular economy to householders through a range of workshops, talks and programmes
	25	New	Explore collaboration with stakeholders such as Refill.ie to reduce single use items.
SEA Comment Promotion of circular economy and reduction of waste is consistent with SEOS particularly around material assets and climate change. AA Comment These amendments will not have the potential alone, or in combination with other plans or projects, to result in likely significant effects to European Sites.			
Milestone 5 Monitoring and Iteration	General Comment	New	The County Council Energy Review (mid 2019) and going forward, will include a glide path illustrating the energy efficiency and GHG emission targets for SDCC up to and including 2030. Appendix II: Total Emissions in South Dublin County Council will also be updated every two years in accordance with EU Covenant of Mayors for Climate & Energy protocol.
SEA comment This additional text provides greater context and links with potential funding streams and collaboration. No significant environmental effects are identified for this CE recommendation.			

Appropriate Assessment Comment:

The inclusion of this text will not have the potential alone, or in combination with other plans or projects, to result in land use effects that will result in likely significant effects to European Sites.

<p>Citizen and Community Engagement (Public Awareness)</p>	<p>General Comment</p>	<p>New</p>	<p>The Council recognises the importance of public and stakeholder engagement in addressing climate change. In recent months, there has been a range of citizen and community engagement initiatives carried out from national to local level. The Department of Communications, Climate Action and Environment has established the National Dialogue on Climate Action, to drive citizen engagement in climate action across Ireland. Co-ordinated by the EPA, the objectives of the National Dialogue on Climate Action are to:</p> <ul style="list-style-type: none"> • Create awareness, engagement and motivation to act (locally, regionally and nationally) in relation to the challenges presented by climate change; • Create structures and information flows to facilitate people gathering to discuss, deliberate and maximise consensus on appropriate responses to these challenges, and to enable and empower appropriate action; • Establish, on a long term basis, appropriate networks for people to meet periodically to consider evidence-based inputs on the economic, social, behavioural, environmental and public aspects of climate and energy policy; and • Provide regular input, through the NDCA, into the prioritisation and implementation of climate and energy policy which can be reported and monitored at local/regional/national levels. <p>To date two regional NDCA workshops have been carried out, in Athlone (June 2018) and Tralee (November (2018). Separate to the NDCA, a range of local and community initiatives have also been undertaken across the country, including Climate ambassadors, Green Schools, Eco Merit, ECO-UNESCO etc.It is recognised that there is a need to foster and build momentum on wider citizen engagement in climate change, across all age groups. Local authorities have significant experience in engaging citizens through their existing functions, including land-use planning, housing, employment, transport and environmental efficiency and awareness. Local authorities are also engaged in existing public participation structures and approaches that are bottom-up, local community centred and are outcome focused. These include the Public Participation Networks, Local Community</p>
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		<p>Development Committees (LCDP), Tidy Towns, Sustainable Energy Communities etc.</p> <p>Younger citizens have also engaged with the climate change agenda by participating in the #FridaysForFuture campaign, including rallies outside Government buildings. The Council aims to develop further links with younger citizens in enhancing climate change awareness and developing educational initiatives in partnership with schools, and youth organisations such as Comhairle na nÓg and Foróige.</p> <p>It is considered that by implementing and updating the CCAP into the future, strengthening existing networks and creating new climate change links, this will progressively inform and encourage all citizens, communities and other stakeholders to have increased access to information and advice. Interest areas could include identification and implementation of relevant energy efficiency measures, renewable energy actions, climate adaptation and resilience measures, access to funding sources such as SEAI grant schemes, the Climate Action Fund etc.</p> <p>Local authority efforts in citizen and community engagement should be supported by the Climate Action Regional Office, the Environmental Protection Agency and other relevant stakeholders. It is part of the CARO remit to engage and support the National Dialogue on Climate Action on a local and regional basis, and also to develop education and awareness initiatives for the public, professionals, schools, NGOs and other agencies engaged in driving the climate change agenda.</p> <p>Insert #Councils4Climate Action case study text based on outcomes of public consultation events.</p>
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	<p>SEA Comment: This text provides greater context and support for public awareness and engagement. Positive interactions with Population and Human Health and Climate Change SEOS and no significant adverse effects are identified for this CE recommendation.</p> <p>Appropriate Assessment Comment This text provides for greater support and engagement under the public awareness section. The inclusion of this text will not result in land use effects and will not have the potential alone, or in combination with other plans or projects, to result in likely significant effects to European Sites</p>		
Citizen and Community Engagement (Public Awareness)	General Comment	New	<p>In implementing and updating the CCAP into the future, strengthening existing networks and creating new climate change links, should be maximised to encourage all citizens, communities and other stakeholders to have increased access to information and advice. Interest areas could include identification and implementation of relevant energy efficiency measures, renewable energy actions, climate adaptation and resilience measures, access to funding sources such as SEAI grant schemes, the Climate Action Fund etc. Local authority efforts in citizen and community engagement should be supported by the Climate Action Regional Office, the Environmental Protection Agency and other relevant stakeholders. It is part of the CARO remit to engage and support the National Dialogue on Climate Action on a local and regional basis, and also to develop education and awareness initiatives for the public, professionals, schools, NGOs and other agencies engaged in driving the climate change agenda.</p>
	<p>SEA Comment: This text provides greater context and support for public awareness and engagement. Positive interactions with Population and Human Health and Climate Change SEOS and no significant adverse effects are identified for this CE recommendation.</p> <p>Appropriate Assessment Comment This text provides for greater support and engagement under the public awareness section. The inclusion of this text will not result in land use effects and will not have the potential alone, or in combination with other plans or projects, to result in likely significant effects to European Sites</p>		
Climate Change Science behind CCAP (The National Context – Ireland)	General Comment	New	<p>The implementation, monitoring and future updates of the Climate Change Action Plan will be consistent with, and have regard to the Oireachtas ‘Climate Change: a cross-party consensus on climate action’ report (March 2019) and the Whole of Government Climate Action Plan.</p>

Partnership and Collaboration with other Local Authorities	Action	New	The Local Authority will work with the Local Authority Waters Programme in its support of communities and stakeholders in the delivery of local water quality projects and initiatives.
	<p>SEA Comment: This text provides greater context and support for collaboration. Positive interactions with Population and Human Health and Climate Change SEOS and no significant adverse effects are identified for this CE recommendation.</p> <p>Appropriate Assessment Comment This text provides for greater collaboration. The inclusion of this text will not result in land use effects and will not have the potential alone, or in combination with other plans or projects, to result in likely significant effects to European Sites</p>		
Partnership and Collaboration with the Business Community	General Comment	New	The Council recognises the role of the business community in addressing climate change. In implementing and updating the CCAP into the future, the Council will engage with the business community and relevant bodies such as the Chamber of Commerce, Local Enterprise Office etc. This can include strengthening existing networks and creating new climate change links, to encourage all business community stakeholders to engage with climate change action and enhance existing projects and initiatives. Interest areas could include energy efficiency measures, renewable energy opportunities, climate adaptation and resilience measures, access to funding sources etc. There is also scope to further explore partnerships across sectors to facilitate climate action project delivery.
	Action	New	The Local Authority will strengthen existing networks and creating new climate change links, to encourage all business community stakeholders to engage with climate change action and enhance existing projects and initiatives. Interest areas could include energy efficiency measures, renewable energy opportunities, climate adaptation and resilience measures, access to funding sources etc.

	<p>SEA Comment</p> <p>This text provides greater context and support for public awareness and engagement and role of business community in addressing climate change. Positive interactions with Population and Human Health and Climate Change SEOS and no significant adverse effects are identified for this CE recommendation.</p> <p>Appropriate Assessment Comment</p> <p>This text sets out the potential leadership role the business community can play in addressing climate change and positions the CCAP to support the business community in delivering actions to address climate change. No specific land use measures are outlined in this text and its inclusion in the plan will not in itself have the potential alone, or in combination with other plans or projects, to result in likely significant effects to European Sites</p>
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<p>The National context - Ireland</p>	<p>General Comment</p>		<p>Under the National Adaptation Framework, sectoral adaptation plans are required to be prepared and submitted to the Government for approval, by 30th September 2019. Adaptation plans will be prepared for the following sectors:</p> <ul style="list-style-type: none"> • Seafood - Department of Agriculture, Food and the Marine • Agriculture - Department of Agriculture, Food and the Marine • Forestry - Department of Agriculture, Food and the Marine • Biodiversity - Department of Culture, Heritage and the Gaeltacht • Built and Archaeological Heritage - Department of Culture, Heritage and the Gaeltacht • Transport infrastructure - Department of Transport, Tourism and Sport • Electricity and Gas Networks - Department of Communications, Climate Action and Environment • Communications networks - Department of Communications, Climate Action and Environment • Flood Risk Management - Office of Public Works • Water Quality - Department of Housing, Planning and Local Government • Water Services Infrastructure - Department of Housing, Planning and Local Government • Health - Department of Health <p>The implementation and future iterations of the Climate Change Action Plan will be consistent with approved sectoral adaptation plans and the Council will work in partnership with sectors to achieve and deliver the sectoral plans.</p>
	<p>SEA Comment</p>		<p>The additional text again provides for greater consistency with sectoral climate change adaptation plans. Therefore, positive interactions in relation to Climate Change SEOS and no significant adverse environmental effects are identified for this CE recommendation.</p> <p>Appropriate Assessment Comment:</p> <p>The additional text provides for greater consistency with sectoral climate change adaptation plans. Screening for Appropriate Assessment of the sectoral plans will be completed and during this assessment the potential for these sectoral plans to combine with the CCAP will be examined.</p>

Building and Energy	General Comment	New	<p>Additional text to be inserted in Energy & Building Section, as follows:</p> <p>Local Authorities have a role in protecting and maintaining the archaeological and architectural resource for future generations. Climate change actions should be carried out in consultation with LA Architectural Conservation Officers, Heritage Officers and other relevant stakeholders. Proposals to improve the thermal performance of or insert renewable energy technologies into historic buildings need to be sensitive to traditional methods of construction to ensure that the proposed works are appropriate and do not actually cause damage to the structure, require the removal of historic fabric such as original windows, doors and floors, or have a detrimental visual impact.</p> <p>National guidance is available to owners to direct appropriate interventions through the Department of Environment, Heritage and Local Government publication "<i>Advice Series: Energy Efficiency in Traditional Buildings</i>" (2010). South Dublin County Council will be mindful of this when carrying out works on any of its own historic building stock and seek to promote and develop best practice in this area.</p>
	<p>SEA Comment</p> <p>Additional text relating to cultural heritage. Therefore, positive interactions in relation to Climate Change and cultural heritage SEOS and no significant adverse environmental effects are identified for this CE recommendation.</p> <p>Appropriate Assessment Comment:</p> <p>No specific land use measures are outlined in this text and its inclusion in the plan will not in itself, or in combination with other plans and programmes, have the potential to result in likely significant effects to European Sites</p>		
Flood Resilience Flood Risk Management	General Comment	New	<p>The Council is working with a range of stakeholders including Irish Water in the management of pluvial flooding across the local authority area.</p>

<p>Flood Resilience</p>	<p>Minor Text Changes</p>	<p>Amended</p>	<p>Flooding is a key climate change risk facing the Dublin Region. Climate change is expected to increase the frequency and/or intensity of heavy rainfall events and storm surges, which would increase the risk of pluvial, fluvial and coastal flooding in vulnerable areas of the County. Extreme rainfall and weather events can also place additional pressure on the urban drainage network and water supply, which can result in network flooding and water shortages. Together with the Office of Public Works (OPW) and neighbouring local authorities, SDCC is actively working to implement projects and programmes that align with the EU Floods Directive and Water Framework Directive. The Floods Directive calls for member states to undertake strategic flood risk assessments and to identify flood risk management measures. Flood maps have been prepared for future climate scenarios, and the proposed community-scale measures are set out in the Flood Risk Management Plans (www.floodinfo.ie). Additional local measures can include nature-based solutions such as integrated wetlands, green infrastructure, and Sustainable urban Drainage Systems (SuDS,) to be used for adaptation and mitigation responses to achieve flood resilience.</p> <p>References Section</p> <ul style="list-style-type: none"> • OPW’s website www.floodinfo.ie, which is a useful public information source for assessing current and future scenarios flood risk. • OPW flood maps for both current and future climate change scenarios. <p>Flood Resilience Table Include full title to the planning guidelines, i.e.” The Planning Systems and Flood Risk Management Guidelines for Planning Authorities, November 2009” (Please note that the Guidelines were published by DECLG (now DHPLG) along with the OPW).</p>
<p>SEA and AA comment; Minor updates to text, no significant effects to SEOs or European Sites.</p>			

<p>Milestone 4: Implementation</p>	<p>Minor Text Change</p>	<p>Amend</p>	<p>Internationally, SDCC will liaise closely with the Covenant of Mayors for Climate and Energy and other established networks of European cities and associations. SDCC in association with the DLA, Codema and CARO will seek technical and financial supports for climate research and practical low carbon solutions. International funding streams that fund climate change related activities are available, such as Interreg Europe, Interreg NWE, LIFE and Horizon 2020. Nationally programmes such as SEAI's better energy communities and the RD&D provide grants for research and building solutions. SEAI have also part funded the development and roll out of the Home Energy Saving Kits to engage with citizens as well as provide grant aid to develop the energy performance contracting projects. The EPA's research programme also provides an opportunity to fund studies into climate impacts and solutions for the DLA.</p> <p>SDCC & DCC recently secured significant funding from the Climate Action Fund (CAF) and the DLA will continue to actively pursue projects eligible for this funding. Codema and CARO will continue to research potential funding opportunities and partnerships with third level institutions. Finally, private sector partnerships are also important to realise low carbon solutions for the DLA and this will be encouraged and facilitated where possible.</p>
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<p>Milestone 5: Monitoring and Iteration</p>	<p>Minor Text Change</p>	<p>Amend</p>	<p>SDCC along with over 7,000 cities and regions in 57 countries, is a signatory to the Covenant of Mayors for Climate and Energy, which is the world’s largest movement for local climate and energy actions. The signatory cities pledge action to support implementation of the EU 40% greenhouse gas reduction target by 2030 and the adoption of a joint approach to tackling mitigation and adaptation to climate change. Accordingly, SDCC commits to submitting a Sustainable Energy and Climate Action Plan (SECAP), outlining the key actions it plans to undertake, and this must be submitted within two years of signing up to the initiative. This current Climate Change Action plan is forming the basis for the SECAP submission, The plan which will feature a Baseline Emission Inventory to track mitigation actions and a Climate Risks and Vulnerability Assessment. SDCC’s county wide baseline emissions inventory was completed in 2018 and will be used as a benchmark to monitor emission reductions up to 2030. Furthermore, Codema will develop an energy master plan for the entire Dublin Region. The Dublin Region Energy Master Plan will create evidence-based, realistic, and costed pathways for the Dublin Region to achieve its carbon emissions reduction targets to 2030 and beyond, up to 2050. The plan will focus on the energy areas where actions can be taken to introduce energy efficiency measures and reduce CO₂ emissions. This commitment with the Covenant of Mayors marks the beginning of a long-term process, with cities committed to reporting every two years on the implementation progress of their plans.</p>
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	<p>SEA Comment</p> <p>This additional text provides greater detail on existing commitments including the Dublin Region Energy Masterplan which has been assessed through the SEA and AA process to date. No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.</p> <p>Appropriate Assessment Comment:</p> <p>This additional text provides greater detail on existing commitments including the Dublin Region Energy Masterplan which has been assessed through the SEA and AA process to date. The inclusion of this text will not result in land use effects that will have the potential alone, or in combination with other plans or projects, to result in likely significant effects to European Sites.</p>		
Adaptation Baseline: Extreme Weather	Minor Text Change	Amend	As shown in the Timeline of Major Climatic Events (Figure 4), the frequency of prolonged extreme cold spells in Ireland has increased, and in the Dublin Region there are additional risks due to these extreme temperatures. During Storm Emma, prolonged periods of cold resulted in water pipes freezing and then bursting as the temperatures started to rise, which left homes in the County without water.
	SEA and AA comment: Minor amendment to text, so significant effects on SEOs or European Sites		

RECOMMENDED MITIGATION MEASURES FOR THE SOUTH DUBLIN CCAP – REVISED

These Mitigation Measures were identified in Section 7 of the Natura Impact Statement and Section 8 of the SEA ER and will also be included in the final SEA Environmental Report and AA Natura Impact Statement.

	<i>Mitigation Measure</i>
	<i>Transport Actions</i>
5	Strengthen traditional villages by improving the public realm through enhancement of green infrastructure measures and sustainable transport linkages
	<i>Flood Resilience</i>
13	Develop template to capture impacts, response and costs (including ecosystem services/natural capital costs) for all major climate events
15	Update DLA urban drainage and flooding policies for current knowledge of flood risk and the latest best practice in drainage design promoting natural flood measures as a priority

20	Minor flood schemes and general maintenance that are designed and implemented to promote nature based solutions where practical
21	Communication and awareness campaigns on flood risk management and natural flood management measures
	<i>Nature Based Solutions</i>
22	Include native species into local authority plans where appropriate as a key nature based measure where appropriate

Section 6 Conclusions

Taking into account the South Dublin County Council Draft Climate Change Action Plan 2019-2024, this Chief Executive's Report on Submissions Received, and Strategic Environmental Assessment and Appropriate Assessment Screening of Chief Executive's Recommendations, it is proposed that the South Dublin County Council Draft Climate Change Action Plan 2019-2024 be approved by the Elected Members of South Dublin County Council, in accordance with the recommendations of this report.

Once approved and finalised, the South Dublin County Council Climate Change Action Plan 2019-2024 will be submitted to the Department of Communications, Climate Action and Environment. This is in accordance with the requirements of the National Adaptation Framework (NAF) 2018.


Appendix A: List of Persons, Organisations and Bodies who made Submissions

Ref	Name
SDCC-CCAP-201902-01	Róisín O'Brien
SDCC-CCAP-201902-02	Niall Roche
SDCC-CCAP-201902-03	Ciara Kelly
SDCC-CCAP-201902-04	Una Ruddock
SDCC-CCAP-201902-05	Una Ruddock
SDCC-CCAP-201902-06	Dave Harrington
SDCC-CCAP-201902-07	Matteo Ferrari
SDCC-CCAP-201902-08	Vincent Tsoi
SDCC-CCAP-201902-09	Alison Gough
SDCC-CCAP-201902-10	Jacinta Carey
SDCC-CCAP-201902-11	Gary Tyrrell
SDCC-CCAP-201902-12	Darren Clarke
SDCC-CCAP-201902-13	Christine Barretto
SDCC-CCAP-201902-14	Madeleine Johansson & Emma Hendrick, obo People Before Profit
SDCC-CCAP-201902-15	Niamh Fanthom
SDCC-CCAP-201902-16	Clodagh O'Reilly
SDCC-CCAP-201902-17	Donal Clarke
SDCC-CCAP-201902-18	Gavin McDonagh
SDCC-CCAP-201902-19	Mayank Jain
SDCC-CCAP-201902-20	Deirdre Tierney
SDCC-CCAP-201902-21	Keith Scanlon
SDCC-CCAP-201902-22	Eamonn O'Riordain
SDCC-CCAP-201902-23	Mairead Forsythe
SDCC-CCAP-201902-24	Paul McCormack Cooney
SDCC-CCAP-201902-25	Eilish Scott obo Ervia
SDCC-CCAP-201902-26	Anna May Harkin
SDCC-CCAP-201902-27	Joe Miller obo RIAI
SDCC-CCAP-201902-28	Eoin O Broin
SDCC-CCAP-201902-29	Marguerite Arbuthnot-O'Brien obo Crann
SDCC-CCAP-201902-30	Orla Farrell obo Crann
SDCC-CCAP-201902-31	Catherine Barry Murphy
SDCC-CCAP-201902-32	Mary Ahern
SDCC-CCAP-201902-33	Declan Hanley
SDCC-CCAP-201902-34	Dudley Steward
SDCC-CCAP-201902-35	Kevin O'Loughlin obo Lucan Tidy Towns
SDCC-CCAP-201902-36	Annie Flynn Obo Four Districts Woodlands Group
SDCC-CCAP-201902-37	John Bird
SDCC-CCAP-201902-38	Peter Kavanagh Obo SDCC Green Party
SDCC-CCAP-201902-39	John Shanahan
SDCC-CCAP-201902-40	James Carton
SDCC-CCAP-201902-41	National Biodiversity Data Centre
SDCC-CCAP-201902-42	EPA – Cian O'Mahony
SDCC-CCAP-201902-43	Dept Agri Food & Marine

SDCC-CCAP-201902-44	Irish Climate Science Forum
SDCC-CCAP-201902-45	Geological Survey Ireland
SDCC-CCAP-201902-46	SDC PPN
SDCC-CCAP-201902-47	Glendoher & District RA
SDCC-CCAP-201902-48	Grainne Dunne
SDCC-CCAP-201902-49	Siobhan O’Keeffe
SDCC-CCAP-201902-50	Eugene Barrett obo Knocklyon Network
SDCC-CCAP-201902-51	Sean Farrell
SDCC-CCAP-201902-52	Leave No Trace Ireland
SDCC-CCAP-201902-53	Robert Dowds, Labour Candidate
SDCC-CCAP-201902-54	Maurizi Sturlesi, Sharo Technologies
SDCC-CCAP-201902-55	Heidi Kelly-Hogan
SDCC-CCAP-201902-56	Francis Timmons Cllr
SDCC-CCAP-201902-57	South Dublin Conservation Society
SDCC-CCAP-201902-58	Lorraine Mac Rory
SDCC-CCAP-201902-59	Eco Unesco – Elaine Nevin
SDCC-CCAP-201902-60	James McAteer
SDCC-CCAP-201902-61	John Lawlor
SDCC-CCAP-201902-62	Eoghan McCarthy obo Gas Networks Ireland
SDCC-CCAP-201902-63	Irenie McLoughlin obo Association of Architectural Conservation Officers
SDCC-CCAP-201902-64	Ian Keogh
SDCC-CCAP-201902-65	Karl Ussher
SDCC-CCAP-201902-66	Oonagh Duggan obo Bird Watch Ireland
SDCC-CCAP-201902-67	Mags Trot
SDCC-CCAP-201902-68	Cllr Emer Higgins Ind
SDCC-CCAP-201902-69	Niall Clarke
SDCC-CCAP-201902-70	Padhraic Kennedy
SDCC-CCAP-201902-71	Darren McGovern
SDCC-CCAP-201902-72	Sinead Fallon
SDCC-CCAP-201902-73	Denise Tobin

Appendix B: Newspaper Notice

14 February 2019 WEST DUBLIN GAZETTE 25



Comhairle Contae
Átha Cliath Theas
South Dublin County Council

PUBLIC NOTICE OF SOUTH DUBLIN COUNTY COUNCIL DRAFT CLIMATE CHANGE ACTION PLAN 2019-2024

Notice is hereby given that South Dublin County Council has prepared a draft Climate Change Action Plan 2019-2024.

The draft Climate Change Action Plan sets out how the Council will improve energy efficiency and reduce greenhouse gas emissions in its own buildings and operations, while making the County more adaptive to the impacts of climate change. The draft Plan includes a range of actions across five key action areas; Energy & Buildings, Transport, Flood Resilience, Nature Based Solutions and Resource Management.

The public consultation process will run from Monday 11 February to Monday 25 March 2019 inclusive, during which time South Dublin County Council draft Climate Change Action Plan 2019-2024, the Strategic Environmental Assessment (SEA) Environmental Report and Appropriate Assessment (AA) Natura Impact Assessment Report, will be available for inspection at the following locations;

South Dublin County Council, County Hall, Tallaght, Dublin 24	Mon -Thurs 9.00 - 17.00, Fri 9.00 - 16.30
South Dublin County Council, Clondalkin Office, Co. Dublin	Mon -Thurs 9.00 - 17.00, Fri 9.00 - 16.30
Lucan Library	Mon -Thurs 9.45 - 20.00, Fri - Sat 9.45 - 16.30
Ballyroan Library	Mon -Thurs 9.45 - 20.00, Fri - Sat 9.45 - 16.30
Tallaght Library	Mon -Thurs 9.45 - 20.00, Fri - Sat 9.45 - 16.30
Clondalkin Library	Mon -Thurs 9.45 - 20.00, Fri - Sat 9.45 - 16.30

The documents may also be viewed on the Council's Public Consultation Portal <http://consult.sdublincoco.ie> and at www.dublincclimatechange.ie

Public Information Events

Members of the public and interested groups are invited to attend the following Public Information Events which will be held by South Dublin County Council;

Climate Change Action Plan 2019 - 2024 Public Consultation Event Information		
Date	Venue	Time
19Feb19	County Hall, Tallaght - you can register now on Eventbrite.ie for this event	18.00 - 21.00
26Feb19	Lucan Library - no registration required	09.00 - 13.00
27Feb19	Ballyroan Library - no registration required	09.00 - 13.00
01Mar19	Tallaght Library - no registration required	09.00 - 13.00

Submissions

Submissions or observations with respect to South Dublin County Council draft Climate Change Action Plan 2019-2024, Strategic Environmental Assessment (SEA) Environmental Report and Appropriate Assessment (AA) Natura Impact Assessment Report are invited from members of the public and other interested parties.

Submissions can be made as follows:

Online at <http://consult.sdublincoco.ie>
Or
By email to climateaction@sdublincoco.ie
Or
By post/ hard copy addressed to:
The Senior Executive Officer,
Environment, Water and Climate Change Department,
South Dublin County Council,
County Hall, Tallaght,
Dublin 24,
D24 YNNS.

Submissions or observations will be accepted from Monday 11 February 2019 to Monday 25 March 2019 inclusive.

The closing date for receipt of submission is Monday 25 March 2019.

Submissions or observations should state your name, address, and where relevant, the organisation, body etc. represented. Please make your submission by one medium only, i.e. post / hard copy or email or online submission.

All submissions or observations received during the above time period will be taken into consideration before the making of the South Dublin County Council Climate Change Action Plan 2019-2024.


If you use assistive technology (such as screen readers) and need a version of any document in an accessible format (such as Word), please email climateaction@sdublincoco.ie and the document in the format requested shall be provided in so far as this is reasonably practicable.

PLEASE NOTE: YOU ARE STONGLY ADVISED TO MAKE YOUR SUBMISSION/OBSERVATION AS EARLY AS POSSIBLE. LATE SUBMISSIONS/OBSERVATIONS WILL NOT BE ACCEPTED.

It should be noted that the Freedom of Information Act applies to all records held by South Dublin County Council.

All advertised information, maps and drawings in relation to South Dublin County Council is available on our website 24 hours a day, seven days a week.

Web: www.sdcc.ie



Appendix C: SEA Screening Conclusion and Determination and AA Screening Conclusion and Determination

SEA Screening Conclusion and Determination

A Strategic Environmental Assessment (SEA) Screening determination has been made by South Dublin County Council regarding actions as recommended by the Chief Executive Report on submissions made on the Draft CCAP 2019-2012.

Section 9 (1) of the (2004) Regulations (S.I. No. 435) (as amended) states “subject to sub-article (2), an environmental assessment shall be carried out for all plans and programmes

(a) which are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications and tourism, and which set the framework for future development consent of projects listed in Annexes I and II to the Environmental Impact Assessment Directive, or

(b) which are not directly connected with or necessary to the management of a European site but, either individually or in combination with other plans, are likely to have a significant effect on any such site.”

As the screening assessment under Schedule 1 of SI 435 of 2004 above demonstrates, the scale, size and location of the CE Recommendations as they relate to actions to the CCAP on foot of public submissions is not identified as giving rise to adverse effects on the environment.

This is due to the nature of the new actions which overall are positive for a number of Strategic Environmental Objectives including Climate Change, Population and Human Health, Material Assets, cultural heritage and landscape. The existing measures included in the SEA ER, Natura Impact Statement of the South Dublin CCAP 2019-2023 are identified as sufficiently robust and subject to their full implementation, no likely significant effects on the environment are identified.

This assessment is further supported by the Screening Statement in support of Appropriate Assessment.

AA Screening Conclusion and Determination

All actions recommended by the Chief Executive Report have been subject to screening for Appropriate Assessment. All actions have been found not to have the potential, alone or in combination with other plans or projects, to result in likely significant effects to European Sites. The inclusion of these actions in the CCAP will not have the potential to result in negative effects to the Conservation Objectives of European Sites occurring within the zone of influence of the CCAP and an Appropriate Assessment of these actions is not required