**Chief Executive’s Report on Submissions to the Draft Biodiversity Action Plan**

**1.0 Introduction**

South Dublin County Council prepared a Draft Biodiversity Action Plan. The Draft Biodiversity Action Plan consists of a written statement. It is accompanied by an Appropriate Assessment Stage One Screening Report.

The Draft Biodiversity Action Plan presents a background to the diversity of nature in the County and to the challenges that face biodiversity and the County in a time of change. The document outlines a series of objectives and actions that aim to achieve the protection and enhancement of the County’s biodiversity, while aiming to ensure that the County’s residents, businesses and visitors continue to enjoy and benefit from the many services that nature provides. The draft action plan has been prepared within the framework of the South Dublin County Council Development Plan 2016-2022 and is a response to national obligations under the National Biodiversity Action Plan 2017 -2021 and under European policy under the EU Biodiversity Strategy for 2030.

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

* lists the persons or bodies who made submissions or observations on the Draft Plan;
* summarises the issues raised by the persons or bodies in the submissions or observations; and
* gives the response and recommendations of the Chief Executive to the issues raised.

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

**2.0 Structure of Report**

The structure of this report is that additions to the Draft Plan are coloured green. Additions to the text are identified through the use of green print, for example

Action 3.3

‘Promote innovative approaches to developing strategic biodiversity policies and objectives in the preparation process for the SDCC Development Plan 2022 -2018 and the SDCC Green infrastructure Strategy, including promoting of habitat restoration, creation, and rewilding, to improve and to introduce new linkages in the network of wildlife corridors habitats for the County. ‘

Proposed deletions of text is coloured in red and ~~strikethrough~~.

**3.0 Public Consultation**

The Draft Biodiversity Action Plan, ‘Connecting with Nature’, was presented for public consultation, commencing on Friday 3rd July and closing on Monday 10th August 2020**.** A total of 34 submissions were received, which raised c460 issues

Interested parties were encouraged to make submissions on the draft action plan via the SDCC Consultation Portal. Alternatively, written submissions could also be posted to the Senior Executive Officer, Land Use Planning and Transportation Department, South Dublin County Council, County Hall, Tallaght, Dublin 24.

Due to restrictions on gatherings arising from Covid-19, the engagement approach to consultation consisted of innovative online ‘Live Events’.  SDCC hosted online Live Events on Tuesday 28th July and Thursday 30th July 830pm.

Other key elements of the public consultation included:

* A Newspaper Notice and feature article appeared in the Tallaght Echo in August 2020; and
* A targeted Social Media campaign including Facebook and Twitter was carried out over the public consultation period

**4.0 Next Steps**

This Chief Executive’s Report on the Draft Plan Public Consultation is hereby submitted to the members of South Dublin County Council for consideration at the November 2020 Council Meeting.

If adopted at the November Meeting, the final document, with agreed changes, will be published in early 2021.

In the event of material changes to the Draft Plan, a further public consultation will be considered.

**5.0 Summary of Chief Executive’s Proposed Amendments to the Draft Biodiversity Action Plan and Recommended Proposed Amendments in response to Submissions on Draft Biodiversity Action Plan**

1. **Proposed Amendment to Text in Section 6.2**

Delete existing paragraph (in red) in Draft plan and Insert the following paragraphs (in green) in Section 6.2 of the Action Plan to confirm the setup of a Biodiversity Forum as follows:

~~The implementation of the agreed targets and actions will be overseen by a County Biodiversity Forum composed of Council staff, Elected Members, representatives of the South Dublin County Public Participation Network, local and~~

~~environmental groups, and state agencies. With an annual budgetary allocation (subject to available resource allocation), projects will be agreed, implemented, and monitored by the County Biodiversity Forum, with an annual report issuing to South Dublin County Council recording progress and achievements.~~

An SPC Sub-Committee for Biodiversity will be setup to assist with the implementation of the Biodiversity Action Plan over the 6-year life to the plan. The SPC Sub-Committee for Biodiversity will be a joint sub-committee comprised of members from the LUPT and EWCC Strategic Policy Committees. The sub-committee will meet as required to make recommendations on the prioritisation and delivery of actions, to review progress on the actions, and to report to the relevant SPCs.

An SDCC Internal Working Group comprised of officers from across the Council will be setup to co-ordinate the implementation of agreed projects arising from the Biodiversity Action Plan across the various Council Departments and Sections.

The responsibility for decisions in relation to this Plan is the function of SDCC. Each action in the plan has an identified owner with responsibility for progressing said action and the owners will report to Council. The delivery of the plan is subject to the availability of resources and budget. SDCC will continue to evaluate and investigate funding opportunities to achieve the Actions.

**2. Proposed Amendments to ‘Actions for Biodiversity’ Table in the Draft Plan**

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| **Summary of proposed amendments to Actions for Biodiversity Tables** | | | | | |
| 1. **GETTING TO KNOW WHAT WE HAVE - Spatial Projects** | | | | | |
| **Action** | **Target/ Aim** | **Timescale** | **Engage with** | **Key Indicators** | **Action Owner** |
| 1.1  Collate ecological data and survey and map the County, to provide an evidence base for  informed biodiversity decision-making and to form the basis for a Green Infrastructure  network, key projects to include:  1.1.i map the distribution of the habitats and species in the County  1.1.ii map and manage the spread of non-native invasive species  1.1.iii survey and monitor biodiversity at identified pollinator sites  1.1.iv survey and map wetlands in the County  1.1.v map the tree canopy cover in the County and quantify its carbon capture  1.1.vi map the County’s hedgerow network and identify key Green Infrastructure links | - Mapping of Non – native invasive species  - Establish monitoring program for identified pollinator sites  - Mapping of wetlands  -Commence surveying of wetlands  - Commence tree canopy study in conjunction with Climate Change Action Plan | Collation will be ongoing across the Plan duration. | NPWS, NBDC,  Tidy Towns, local and  community groups,  academic institutions. | Number of habitats and species  mapped, number of data sets  submitted to NBDC, developers  and a G.I. strategy in place. | Director of Land Use Planning and Transportation (LUPT)  and  Director of Environment, Water & Climate Change |
| 1.2  Prepare a GIS database (or similar) to host biodiversity evidence base | - Prepare a GIS database (or similar) to host biodiversity evidence base | Year 3-6 | NPWS,  Tidy Towns, local community groups, habitat surveyors and  developers | Number of surveys collated into a mapped based database | Director of Land Use Planning and Transportation (LUPT) |
| **2. TELLING THE STORY – Engagement, Education, and Research** | | | | |  |
| 2.1  Develop a Biodiversity Communications Strategy, to celebrate and promote the  enjoyment and protection of nature in South Dublin County, promoting engagement with national initiatives and events such as Biodiversity Week, Tree Week, Heritage Week, Pure Mile etc,. | -A Biodiversity Communication Strategy  - Establish SPC Sub Committee and SDCC Internal Working Group | Year 1 - 2 | social media platforms,  local media, local and national  biodiversity interest groups  and agencies. | Number of posts, press  releases, media hits,  responses, no.  articles published. | Director of Land Use Planning and Transportation (LUPT) |
| 2.2  Support rural and urban communities to undertake local biodiversity projects,  training, and citizen science, encouraging appropriate initiatives that protect  biodiversity while benefiting local economies. | -Support initiation of 3 community led local biodiversity projects  -Provide a minimum of 3 public training events | On-going across the 6 years of the plan | rural and urban interest  groups, Local Enterprise  Office, LEADER, environmental  organisations. | No. of projects applied for  and completed. | Director of Land Use Planning and Transportation (LUPT) |
| 2.3  Quantify and promote the economic, social and well-being benefits (natural capital) provided by the  County’s ecological landscapes (ecosystem services) to help promote and build awareness of these benefits. | Engage appropriate expertise and complete research on one SDCC public park. | Year 1-2 | NPWS, academic  institutions. | A quantification of the  economic benefits derived  from the natural world  which supports the County’s  economic and social  development. | Director of Land Use Planning and Transportation (LUPT)  and  Director of Environment, Water & Climate Change |
| **3. LEADING THE WAY - Policy, Good Governance and Climate Action** | | | | |  |
| 3.1  a). Devise and implement good governance strategies to ensure the smooth integration  of national and EU biodiversity legislation and policy requirements into all Council  plans, projects, and services.  b). Provide biodiversity training for stakeholders  c). Annual reporting on plan implementation | -Establish SPC Sub Committee and SDCC Internal Working Group  - Draft and agree an internal governance process in relation to biodiversity  -Provide a minimum of 3 continuous professional development events for stakeholders  - Report annually to relevant SPCs and action owners report to full Council at end of Year 2. | Year 1 - 2 | NPWS, EPA. | Biodiversity considerations  integrated into all new SDCC plans,  projects and services. | Director of Land Use Planning and Transportation (LUPT)  and  Director of Environment, Water & Climate Change |
| 3.2  Develop and implement best practice biodiversity protection guidance ~~guidelines and~~  ~~maintenance plans for the County’s habitats and species, for use on Council lands~~  ~~and as guidance~~ to assist local communities, ~~developers,~~ businesses, farming  community, schools, etc. | Commence and complete biodiversity guidance and information for local community groups, householders and schools for four habitat types and/or species. The four would be agreed with the action owner but for example could include guidance for hedgerows; grassland verges; recording garden birds; planting for pollinators. | Year 3-6 | NPWS, NBDC. | Number of guideline documents  prepared, launched, and actively  promoted. | Director of Land Use Planning and Transportation (LUPT) |
| 3.3  Promote innovative approaches to developing strategic biodiversity policies and objectives in the preparation process for the SDCC Development Plan 2022 -2018 and the SDCC Green infrastructure Strategy, including promotion of habitat restoration, creation, and rewilding, to improve and to introduce new linkages in the network of wildlife corridors habitats for the County. | Contribute and influence the development of biodiversity policy in the SDCC Development Plan 2022 -2018 and the SDCC Green infrastructure Strategy. | Year 3-6 | NPWS, EPA, local  groups. | Biodiversity issues mainstreamed  across the reviewed SDCC  Development Plan. | Director of Land Use Planning and Transportation (LUPT) |
| 3.4  Coordinate with the Council’s Climate Change Action Plan 2019-2024 to identify  impacts on biodiversity arising from climate change, targeting, and implementing  necessary measures to assist biodiversity adapt to changing conditions. | Support the delivery of the Climate Change Action Plan 2019 -2024 by carrying out 3 identified biodiversity projects. | Year 1-2 | Council’s CCAP team,  State agencies, NBDC. | Delivery of Green Infrastructure  Strategy that assists species adapt  to climate change by maintaining  interconnecting and functioning  (albeit changing) habitats. | Director of Environment, Water & Climate Change |
| **4. BIODIVERSITY - Protect, Restore and Create** | | | | |  |
| 4.1  For SDCC projects, apply the policies from the National Biodiversity Plan and the biodiversity policies and objectives from the active County Development Plan. | SDCC projects to apply the relevant adopted policies and objectives. | On-going across the 6 years of the plan | NPWS, EPA, expert groups | Number of biodiversity mitigation measures incorporated | Director of Land Use Planning and Transportation (LUPT) |
| 4.2  To continue to research methods to further minimise the use of chemical biocides that are harmful to wider biodiversity. | Carry out research and agree appropriate changes in SDCC practices, if required and economically feasible. | Year 3-6 | NPWS, EPA |  | Director of Environment, Water & Climate Change |
| 4.3  In partnership with Local Authority Waters Programme (LAWPRO), local communities, business groups and state agencies, assist with the development of community River Biodiversity Action plans for the County’s rivers, to target protection and restoration measures for these key Green Infrastructure habitats. | Completion of a community led River Biodiversity Action plan. | Year 1 – 2 | LAWPRO, local groups, local business, state agencies | Number of River Biodiversity Action plans | Director of Environment, Water & Climate Change |

**6.0 Summary of Issues and Chief Executive’s Response and Recommendations on Submissions**

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| **Issues Raised** | **Proposed CE Response and Recommendation** |
| **Biodiversity Forum**  5 specific submissions   * Submissions requested further detail on the formation, authority, and proposed activity of the County Biodiversity Forum. * Requested that the Forum have equal representativity from across the County. * Recommended the formation of an internal Biodiversity Team, with cross-departmental engagement, including Depot staff. | The content of the submissions is noted. The Chief Executive considers that a SPC Sub-Committee for Biodiversity will be setup to assist with the implementation of the Biodiversity Action Plan over the 6-year life to the plan. The SPC Sub-Committee for Biodiversity will be a joint sub-committee comprised of members from the LUPT and EWCC Strategic Policy Committees. The sub-committee will meet as required to make recommendations on the prioritisation and delivery of actions, to review progress on the actions, and to report to the relevant SPCs.  An SDCC Internal Working Group comprised of officers from across the Council will be setup to co-ordinate the implementation of agreed projects arising from the Biodiversity Action Plan across the various Council Departments and Sections.  Membership of the relevant SPCs includes a PPN representative, whose role facilitates the dissemination of information on the work of the sub committee.  **Chief Executive’s Recommendation**  It is recommended that text be amended in Section 6.2 of the Draft Biodiversity Action Plan. Full details in Section 5.0 of this report. |
| **Biodiversity** **Officer**  15 specific submissions   * Recommendations for a dedicated Biodiversity Officer post to be established to focus on the implementation of the B. Plan. * Recommendations for a Biodiversity Officer and a cross-departmental Biodiversity Team * Recommendations for the creation of a Biodiversity Officer/Co-ordinator position and/or Biodiversity Unit, to liaise with Tidy Towns, schools, Parks staff, community groups etc. | The creation of a Biodiversity Officer/ Biodiversity Co-ordinator position is subject to budgetary constraints and Work Force Plan parameters. As such, text relating to same is outside the scope of the Biodiversity Action Plan.  **Chief Executive’s Recommendation**  The Chief Executive recommends no changes to the Draft plan. |
| **Biodiversity Protection**  80 specific submissions   * No actions listed in draft Plan to protect/conserve listed species/ red and amber listed species * Actions needed to protect biodiversity in specific locations e.g. Liffey Valley, Dodder Valley, Dublin Mts., Council’s parks, * Actions needed to ensure compliance and enforcement of biodiversity protection measures; the need for accountability for damage to biodiversity; bye-laws to protect biodiversity outside of protected sites * Positive submissions on the inclusion of the ‘Best Practice’ action * Recommendations to reduce/stop the use of chemicals in public spaces * Recommendations for various grassland management techniques for biodiversity enhancement * Submissions regarding the management of Invasive Species * Specific recommendations for the implementation of the Liffey Valley SAAO * Recommendation regarding biodiversity both inside and outside of protected areas. * Recommendations regarding actions for pollinators * Recommendations for biodiversity restoration and rewilding * Recommendations for protection measures for the County’s rivers and riparian habitats * Need to identify the specific threats to biodiversity in South Dublin County, and target the B. Plan to these threats. * Submissions on the better retention of trees, for significantly more TPOs, for the review of the Council’s Tree Management plan, for community orchards, and for an increase in the tree cover in the County. * Submissions re water quality issues, better management of ponds and lakes, unregulated run-off into rivers and streams, domestic mis-connections causing water quality issues. * Submissions re the need to map and protect wetlands | The implementation of each of the proposed actions in the Plan will act to provide the baseline information and knowledge to further protect biodiversity in the County, by contributing to the development and implementation of more robust and enhanced conservation policies and enforcement objectives.  Also, improving the integration of biodiversity legislation and policy requirements into all Council plans and projects (Action 3.1 ), will assist in reducing the need for Enforcement/ compliance actions.  See amended Action 3.2 of draft Plan: Develop and implement best-practice guidance for local communities.  Alternative methods of maintenance can be researched under Action 4.2 in relation to reducing the use of chemicals.  SDCC has committed to the All-Ireland Pollinator Plan and currently manages over 100 ha of parkland for biodiversity.  SDCC is currently implementing a mapping and treatment programme for invasive species. See also Action 1.1.ii  The implementation of the Liffey Valley Management Plan is beyond the scope of the B.A.P. Contributions to any future implementation of that Plan can be made from the actions of the B.A.P.  Biodiversity protection outside of protected sites is an objective of the County Development Plan. The implementation of this Plan will also assist with the identification and protection of this biodiversity.  SDCC is a signatory to the All-Ireland Pollinator Plan. A South Dublin County Pollinator Plan is currently in preparation by EWCC Department.  This can be achieved under Action 2.2: Support rural and urban communities to undertake local biodiversity projects etc …  Proposed inclusion of an additional specific action for rivers in proposed additional Theme.  The implementation of the proposed additional Theme to ‘Protect, Restore, and Create’ will assist with identifying and addressing local threats to biodiversity  Trees issues are addressed under Action 1.1.v (To map tree cover and quantify its carbon capture), and can also be targeted under Action 2.2 (local community projects), Action 2.3 (quantifying ecosystem services), amended Action 3.2 (best practice biodiversity protection guidance), Action 3.4 (climate change adaptation measures).  Addressing water quality issues are a function of SDCC EWCC Department. This Plan can assist by targeting river issues with the additional proposed action to prepare River Biodiversity Action Plan.  A specific Action to survey and map wetlands in the County is addressed under Action 1.1.iv  **Chief Executive’s Recommendation**  It is recommended that any additional theme‘Biodiversity -Protect, Restore, and Create’ with 3 additional actions. Full details in Section 5.0 of this report. |
| **Climate Change**  2 specific submissions   * Recommendations for additional tree planting to address Climate Change actions | Addressed under Action 3.4 (Co-ordinate with the Council's Climate Change Action Plan 2019-2024)  **Chief Executive’s Recommendation**  The Chief Executive recommends no changes to the Draft plan. |
| **Communications**  72 specific submissions  Recommendations for greater SDCC-community engagement projects for biodiversity; for increased digital communications/PR; continue publishing weekly newspaper biodiversity articles; recommendations for wide ranging educational/awareness raising materials for schools, businesses, individuals and community groups; for increased reporting on projects and progress to Council/public; for development and communication of guidelines and best practice; for biodiversity outreach programmes; to improve links/ communications with Tidy Towns and other groups; comment on inadequate consultation process; to target children’s biodiversity education; to encourage Citizen Science projects; to support volunteer Park Guides.  Specific locations for projects suggested: Waterstown Park | Issues relating to the promotion and enjoyment of biodiversity, education, raising awareness, best practice guidelines, PR and media communications can be addressed under Action 2.1 (Develop a Biodiversity Communications Strategy to promote enjoyment and protection of nature etc…) and Action 3.2 (Develop and implement best practice biodiversity protection guidance etc…)  **Chief Executive’s Recommendation**  It is recommended that Action 2.1 be reworded. Full details in Section 5.0 of this report. |
| **Designate new biodiversity protection areas**  9 specific submissions   * Recommendations to designate new protected areas for biodiversity e.g. Massey’s Wood as a pNHA; extension to Natura 2000 sites; buffer zones around Natura 2000 sites and pNHAs.      * Use SAAO mechanism to protect sensitive landscapes from development and recreational pressures * Identify local sites as Sites of Interest for Nature Conservation and include in Co. Dev. Plan e.g. Brittas Ponds, Rathcoole Wood, hedgerows | The designation of proposed Natural Heritage Areas and Natura 2000 sites is a function of National Parks and Wildlife Service.  The identification of especially important areas for biodiversity will emerge as surveys are collated (Action 1.1). Which form of protection/designation that may be assigned to local sites of biodiversity interest is more appropriately addressed under the County Development Plan.  **Chief Executive’s Recommendation**  The Chief Executive recommends no changes to the Draft plan. |
| **Ecosystem Services**  5 specific submissions   * The ecosystem services delivered by woodlands such as Rathcoole Wood are highlighted and recommended for protection, e.g. flood resilience, physical and mental health, increased air purity, and a dynamic carbon sequestration rate | Ecosystem Services are addressed under Action 2.3 (Quantify and promote the economic benefits (Natural Capital) provided by the County’s ecological landscapes (ecosystem services). Land use zoning and designations are issues for the County Development Plan. The preparation of the South Dublin County Council Development Plan 2022-2028 is a statutory process that has commenced.  **Chief Executive’s Recommendation**  The Chief Executive recommends no changes to the Draft plan. |
| **Editing**  14 specific submissions   * Recommendations for editing, including typographical errors, suggested additional maps, labelling of photographs, include population statistics, provide additional information on habitats and species, include definition of ‘high nature value areas’ etc. | These have each been reviewed.  **Chief Executive’s Recommendation**  The Chief Executive recommends no changes to the Draft plan. |
| **Enforcement Issues**  8 specific submissions   * Recommendation to quantify habitat loss due to planning issues * Suggestion that recommendations of other state agencies are not considered adequately during planning process * Request for a complaints procedure, to follow up on biodiversity damage events. | Improving the integration of biodiversity legislation and policy requirements into all Council plans and projects (Action 3.1), will assist in reducing the need for Enforcement/compliance actions.  **Chief Executive’s Recommendation**  The Chief Executive recommends no changes to the Draft plan. |
| **Green Infrastructure**  32 specific submissions   * Recommendation to create a looped walk behind the Balrothery Weir * Suggestions of parks and other locations that can act as Green Infrastructure links * Recommendations to beware of and to avoid situations where amenity provision conflicts with biodiversity protection * Green roofs suggestion for commercial and residential developments * Highlighting of development and landscaping as obstacles to Gr. Inf. * Concerns re loss and fragmentation of Gr. Inf. due to maintenance, scrub removal, culverting, use of attenuation tanks instead of natural hedgerows, ditches etc. * Maintain the Dublin Mts. as a green belt, clear of development * Loss of open space/parkland to infill housing, fragmenting Gr. Infr. links. * Highlighting importance of rivers, riparian habitats, private garden spaces, roadside verges as Gr. Infr. links. | The provision of increased formal access to ecologically sensitive areas can result in disturbance to protected species and is not generally encouraged.  The development of a Green Infrastructure Strategy for South Dublin County is currently being undertaken for the County Development Plan 2022-2028. This Strategy will directly contribute to the development of biodiversity policies for the new County Development Plan. The Strategy will also identify knowledge gaps and opportunities that this Plan can assist with.  A number of the issues raised will be addressed by the County Development Plan process and the integrated Green Infrastructure Strategy.  **Chief Executive’s Recommendation**  The Chief Executive recommends no changes to the Draft plan. |
| **Habitat Creation**  36 specific submissions   * Recommendations for specific locations for biodiversity creation/ rewilding/ enhancement projects e.g. Waterstown Park, Whitestown Stream, Dodder Valley, Tymon Park, Jobstown Park * Ringfence landscaping and biodiversity budgets for road construction works * Consider forest projects such as ‘Food Forests’, mini ‘Stepping Stone’ forests, memorial forest in Kiltipper Park, community orchards * Review the planting of roundabout, with the Pollinator Plan in mind * Identify sites for rewilding projects e.g. land fill sites, dumps, old quarries, etc. * Cerate a Country tree nursery e.g. Kiltipper Park, Friarstown, Tymon Park * Incorporate additional wetlands in the County | The Chief Executive notes the content. It is considered that the Action 3.3 should be reworded and expanded to include the promotion of habitat restoration, creation, and rewilding projects, to improve and to introduce new linkages in the network of wildlife corridors habitats for the County.  **Chief Executive’s Recommendation**  It is recommended that any additional theme‘Biodiversity -Protect, Restore, and Create’ with 3 additional actions. Full details in Section 5.0 of this report. |
| **Mapping**  10 specific submissions   * Create a ‘Natural Linkages’ Map * Map hedgerows, river systems, wetlands, important species, the Liffey Valley, River Management Maps | Mapping of habitats and species are be addressed under Action 1.1 (Collate ecological data and survey and map the County etc…)  **Chief Executive’s Recommendation**  The Chief Executive recommends no changes to the Draft plan. |
| **Monitoring**  8 specific submissions   * Recommendations for details to be included re monitoring and reporting of B. Plan actions * Recommendations to evaluate and monitor how recent permitted developments have contributed features/areas to the G.I. network | The Chief Executive notes the content.  **Chief Executive’s Recommendation**  It is recommended to insert additional columns with Targets/Aims, Action Owners and Timescales in the Actions for Biodiversity Tables. |
| **Non-Applicable submissions**  12 specific submissions   * Request for the Management Plans of SDC Natura 2000 sites and pNHAs * Request for a list of all actions undertaken by SDCC to implement the Liffey Valley SAAO and to seek to improve and extend it since 2016. Also, a list of the specific actions SDCC intend to take up to 2026 re the above point. * Suggestion for a humane management programme for feral cats * Restoration of Malachi Horan’s house * Remove single use plastics from use * Gather baseline data of EU protected species within Natura 2000 sites and Zones of Influence * Forestry Licences * Election Posters | These proposals are deemed not to be applicable to the County Biodiversity Action Plan.  **Chief Executive’s Recommendation**  The Chief Executive recommends no changes to the Draft plan. |
| **Natural Capital**  3 specific submissions   * Calculate the value on Biodiversity and Parks/Open spaces * Assess each green space like a BER Rating i.e. a 'Biodiversity Environmental Rating' | The Chief Executive notes the content. Natural capital issues are addressed under Action 2.3  **Chief Executive’s Recommendation**  The Chief Executive recommends no changes to the Draft plan. |
| **Partnerships**  25 specific submissions   * Recommendations to form partnerships to achieve B. Plan objective e.g. Irish Water, Dublin City Council, Tidy Towns Groups, Coillte, local influencers, local community groups, environmental conservation groups, the Dublin Mountains Partnership, business community, NRA, 3rd level institutions, National Biodiversity Data Centre, other Local Authorities, Transition Year students. | The Chief Executive notes the content. Addressed under Actions 2.1 (Develop a Biodiversity Communications Strategy…) and Action 2.2 (Support rural and urban communities to undertake local biodiversity projects …)  **Chief Executive’s Recommendation**  The Chief Executive recommends no changes to the Draft plan. |
| **Planning Issue – Rathcoole Wood**  16 specific submissions   * Recommendation to change the zoning from residential to a protected area * Recommendation to protect and enhance the Rathcoole Woodlands * Recommendation that Rathcoole Woodland be recognised as an area of significant ecological importance * Recommendation that any development be frozen or delayed until a full appreciation for the multiple functions of the woodland is assessed. * Recommendation to undertake annual ecological surveys and provenance and age studies on very old Hazel trees. * Undertake research on rewilding, species counts, carbon sequestration, water absorption by trees, and begin sensitive management of the woodland, as Council-owned land. | The Chief Executive notes the content. The land in question is zoned under the County Development Plan for residential development. Zoning issues cannot be addressed through the Biodiversity Action Plan but are addressed through the County Development Plan process. The preparation of the South Dublin County Council Development Plan 2022-2028 is a statutory process that has commenced. SDCC is undertaking a series of ecological assessments of the Rathcoole area.  **Chief Executive’s Recommendation**  The Chief Executive recommends no changes to the Draft plan. |
| **Policy Alignment**  15 specific submissions   * Recommendation that the Biodiversity Plan should be incorporated into the County Development Plan and not be a standalone document * Have collective alignment between Council policies and plans such as biodiversity plan, climate action plan, Council’s Litter Management Plan etc * Embrace the objectives and commitments, as set out in EU Biodiversity Strategy for 2030 and to make sure that its final agreed Biodiversity Action Plan shows due regard to and is in compliance with the Strategy’s goals and actions. | The Biodiversity Action Plan is an action of the County Development Plan.  Addressed under Action 3.1 (Devise and implement good governance strategies to ensure the smooth integration of national and EU legislation and policy into all Council plans, projects, and services.  **Chief Executive’s Recommendation**  The Chief Executive recommends no changes to the Draft plan. |
| **Resources**  21 specific submissions   * Clarification needed on how the Biodiversity Plan is to be resourced, both financial and staffing * Provide the necessary resources with a dedicated unit and staff * Recommendation for a Biodiversity Grants Programme * Greater accountability is needed for Council Grants, to determine if the environment or local biodiversity will be impacted and who is eligible - Community Groups, tidy Towns, Schools, Churches, businesses etc., * Clarification is needed regarding the future of the Tidy Towns initiative and its grants - difficult to get Tidy Towns projects off the ground without buy-in from SDCC. * A recommendation to assess and report on current enforcement capacity, to include where improvements and additions to these measures can effectively be established. * Suggestion to seek financial assistance from the EU’s European Regional Development Fund to support to create or restore wildlife habitats across the county | Financial and staffing resources are dependent on budgetary constraints and are a function of the Council Executive.  **Chief Executive’s Recommendation**  The Chief Executive recommends no changes to the Draft plan. |
| **Rural Community**  4 specific submissions   * Consideration needs to be given to the rural aspect of the County, farmland outside of Protected Areas * B. Plan should formulate and deliver training for farmers and rural landowners on the importance of biodiversity, climate change, water quality and upland management. * Suggestion that there is a need to expand our understanding beyond the urban landscape | Rural communities and rural issues are addressed under Action 2.2 (Support rural and urban communities to undertake local biodiversity projects…)  **Chief Executive’s Recommendation**  The Chief Executive recommends no changes to the Draft plan. |
| **Survey Data**   1. specific submissions  * Recommendations for the survey of riparian habitats, hedgerows, native and non-native trees, woodlands, bat corridors, rare and red-listed bird species * Revisit the 2012 Biodiversity study of the River Glin * Priority should be placed on facilitating surveys/ studies relating to species, habitats, and ecosystems most vulnerable to the effects of climate change | Issues regarding the survey of biodiversity resources are addressed under Action 1.1 (Collate ecological data and survey and map the County…)  **Chief Executive’s Recommendation**  The Chief Executive recommends no changes to the Draft plan. |
| **Sustainability**  4 specific submissions   * Recommendation that communities need to be sustainable to enhance biodiversity, to move towards more responsible production and consumption and put an end to waste * Recommendation that SDCC considers facilitating the development of an ecovillage on its land. * Recommendation for more allotments for urban areas, including green-roof spaces * Support the production of locally produced organic food | Addressed under Action 2.1 (Develop a Biodiversity Communications Strategy…)  **Chief Executive’s Recommendation**  The Chief Executive recommends no changes to the Draft plan. |
| **Targets**  29 specific submissions   * B. Plan needs to have specific targets, funding objectives, and programmes, as per the EU Biodiversity Strategy 2030 * The Plan needs to be more ambitious, with a clear vision, budget, targets and accountability * Timelines and reporting mechanisms are needed. * Key Performance indicators are needed, to ensure success of plan * Targets should be backed up by policies in the County Development Plan * Suggestion that the proposed 6-year timeline for the Plan is too long | **Chief Executive’s Recommendation**  It is recommended to insert additional columns with Targets/Aims and Timescales in the Actions for Biodiversity Tables. |
| **Waste Control**  3 specific submissions   * Issues of illegal dumping of garden waste, construction waste, | Addressed under Action 3.1 (Devise and implement good governance strategies to ensure the smooth integration of local, national and EU biodiversity legislation and policy requirements into Council plans, projects and service delivery.  **Chief Executive’s Recommendation**  The Chief Executive recommends no changes to the Draft plan. |

**7.0 List of Persons / Organisations who made a Submission**

* Proinsias Fhlannchadha
* Lorraine MacRory
* Dublin Mountain Conservation and Environmental Group
* Cllr Francis Timmons
* Cllr Francis Timmons
* Yvonne Collins
* David Stanley
* Dara Stanley
* Una Ruddock
* Christine Barretto
* Helen Grogan
* Liam Sinclair Green Party Tallaght
* Palmerstown Meitheal Tidy Towns
* Lucan Tidy Towns
* Sally Graver
* Dublin City Council
* Tallaght Community Council
* Dublin Mountains Partnership
* Four Districts Woodland Habitat Group
* Litter Mugs
* Four Districts Wild Habitat Group
* South Dublin Environmental Network
* Dodder Valley Litter Mugs
* Betsy Omidvaran
* Deirdre Tierney
* Guss O'Connell
* Christine Barretto
* Una Ruddock
* Róisín McAleer
* South Dublin Conservation Society
* Annette O Connor
* Eoin Ó Broin
* Eoin Ó Broin
* Glendoher and District Residents Association and Ballyboden Tidy Towns