

**Chief Executive's Report on Submissions Received**  
**to the**  
**South Dublin County Council**  
**Draft Climate Action Plan 2024-2029**

**January 2024**

**Environment, Water & Climate Change Department**

**South Dublin County Council**

## Table of Contents

<b>Item</b>	<b>Page</b>
List of Tables .....	4
List of Figures .....	4
1 Introduction .....	5
1.1 Purpose of the Report.....	5
1.2 Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA).....	6
1.3 Background to the Climate Action Plan .....	6
2 The Public Consultation Process .....	8
2.1 Outline of the Public Consultation Process.....	8
2.2 Key Elements of the Public Consultation Process.....	8
2.3 Public Information Events.....	9
2.4 Engagement with Key Stakeholders .....	12
3 Details of the Submissions .....	14
3.1 Introduction .....	14
3.2 List of Persons, Organisations and Bodies who made Submissions .....	14
3.3 Summary of Issues Raised in Submissions .....	14
3.4 Chief Executive’s Responses and Recommendations .....	15
3.5 Structure of Proposed Modifications to the Plan .....	16
4 Categorisation, Summary and Responses to Issues Raised .....	17
4.1 Submission from the Department of the Environment, Climate and Communications.....	17
4.2 Submission from the Department of Transport .....	18
4.3 Submissions on Section 1 Introduction.....	24
4.4 Submissions on Section 2 The Climate Action Plan Process .....	30
4.5 Submissions on Section 3 Evidence-Based Climate Action.....	33
4.6 Submissions on Section 4 Responding to Risks - Emergency Response Planning .....	43
4.7 Submissions on Section 5 Energy & Buildings.....	45
4.8 Submissions on Section 5 Transport .....	62

4.9 Submissions on Section 5 Flood Resilience.....	81
4.10 Submissions on Section 5 Nature Based Solutions .....	88
4.11 Submissions on Section 5 Circular Economy and Resource Management .....	105
4.12 Submissions on Section 5 Community Engagement.....	116
4.13 Submissions on Section 6 Decarbonising Zone .....	122
4.14 Submissions on Section 7 Implementation and Reporting.....	128
4.15 Submissions on Strategic Environmental Assessment (SEA) & Appropriate Assessment (AA) .....	134
4.16 Summary of Chief Executive’s recommendations for Proposed Modifications .....	139
5 Conclusions and Resolution .....	146
Appendix I: List of Persons, Organisations and Bodies who made Submissions .....	147
Appendix II: Public Notice of Draft Plan Public Consultation.....	149
Appendix III: SEA Screening Conclusion and Determination and AA Screening Conclusion and Determination.....	150

**List of Tables**

Table 1: Public Consultation Events ..... 10

Table 2: Pop-Up Draft Climate Action Plan Information Stand in SDCC Libraries ..... 11

Table 3: Engagement at SDCC Area Council Meetings ..... 12

Table 4: Twitter Posts ..... 12

Table 5: Facebook Posts..... 13

Table 6: Instagram Posts ..... 13

Table 7: Submission Issue Breakdown ..... 15

**List of Figures**

Figure 1: Public Consultation event, Edge café, Tallaght ..... 10

Figure 2: Four DLA’s Public Consultation event, Mansion House, Dublin ..... 11

## 1 Introduction

### 1.1 Purpose of the Report

South Dublin County Council has prepared a Draft Climate Action Plan 2024-2029. The Draft Plan sets out mitigation, adaptation and other climate action measures, to create a low carbon and climate resilient County. This is aligned to the Government's overall National Climate Objective, which seeks to pursue and achieve, by no later than the end of 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy.

The Draft Plan includes a range of actions across the six theme areas of Energy & Buildings, Transport, Flood Resilience, Nature Based Solutions, Circular Economy & Resource Management and Citizen Engagement.

Pursuant to Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021, notice of the preparation of the South Dublin County Council Draft Climate Action Plan 2024-2029, was given on Wednesday 20<sup>th</sup> September 2023. Submissions or observations regarding the Draft Plan and Environmental Reports (Strategic Environmental Assessment and Appropriate Assessment) were invited for a period of just over 6 weeks, from Wednesday 20<sup>th</sup> September 2023 to Friday 3<sup>rd</sup> November 2023, inclusive.

In accordance with the requirements of the Climate (Amendment) Act 2021, this Chief Executive's Report summarises and details the outcome of the Public Consultation process on the Draft Climate Action Plan, as follows:

- lists the persons, organisations or bodies who made submissions or observations on the Draft Climate Action Plan;
- summarises the issues raised by the persons, organisations or bodies in the submissions or observations;
- gives the response and recommendation of the Chief Executive to the issues raised; and
- outlines any proposed modifications to the Draft Plan, on foot of the Public Consultation process.

This Chief Executive's Report on Submissions Received is hereby submitted to the Elected Members of the Local Authority, for their consideration. An update on the Draft Climate Action Plan and Public Consultation was given at a Special Environment, Public Realm and Climate Change Strategic Policy Committee (SPC) Meeting, held on Wednesday 13<sup>th</sup> December 2023.

An online Briefing for Elected Members will take place on **Wednesday 24<sup>th</sup> January 2024 from 2pm to 2.45pm**, to provide an overview of the Chief Executive's Report.

At the **February 2024 Council Meeting** of South Dublin County Council, the Elected Members must **decide by resolution**, whether to:

- approve, or
- approve, subject to such modifications as they consider appropriate, the local authority climate action plan.

Within thirty (30) days of the approval of the final local authority Climate Action Plan by the Elected Members, the Council will publish the final plan. The Climate Action Plan shall have effect for a period of five years from the date on which it is approved by the Elected Members.

### **1.2 Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)**

An Environmental Report accompanies the Draft Climate Action Plan. The Environmental Report contains a detailed analysis of the Draft Climate Action Plan and how the implementation of the Plan would impact on its receiving environment. The Chief Executive's recommendations as set out in this report (including recommendations on the Environmental Authorities submissions detailed in Section 4.15), have been assessed to determine whether they would have any significant impact on the environment. Taking into account the mitigation measures which have already been integrated into the Draft Plan, it is considered that the modifications proposed on foot of recommendations in this Chief Executive's Report, will not have any significant adverse effect on the environment.

In accordance with requirements under Article 6 of the EU Habitats Directive (92/43/EEC) the Draft Climate Action Plan and modifications proposed on foot of this Chief Executive's Report have been screened, to assess whether they would have a significant effect on one or more Natura 2000 sites. It is considered that the Draft Plan and modifications proposed on foot of the Chief Executive's recommendations, alone and in combination with other plans and projects, will not have any significant effect on any Natura 2000 sites.

The Elected Members shall give approval for the Climate Action Plan, 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, as amended.

### **1.3 Background to the Climate Action Plan**

The Climate (Amendment) Act 2021 specifically requires all local authorities in Ireland to prepare and approve a Climate Action Plan, in consideration of wider national climate and energy targets, addressing both mitigation and adaptation measures. This is aligned to the Government's overall National Climate Objective, which seeks to pursue and achieve, by no later than the end of 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. The Draft Plan demonstrates a coherent approach to climate action across the administrative and political structure of the local authority.

The Draft Climate Action Plan sets a clear pathway for South Dublin County Council to:

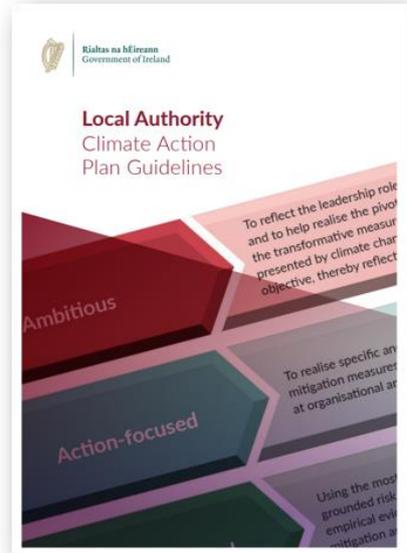
- actively translate national climate policy to local circumstances with the prioritisation and acceleration of evidence-based measures;
  - assist in the delivery of the climate neutrality objective at local and community levels;
- and

- identify and deliver a Decarbonising Zone (DZ) within the local authority area to act as a test bed for a range of climate mitigation, adaptation and biodiversity measures in a specifically defined area, through the identification of projects and outcomes that will assist in the delivery of the National Climate Objective.

The Draft Plan has been prepared in accordance with the [Local Authority Climate Action Plan Guidelines](#), developed in response to Section 16 of the Climate (Amendment) Act 2021, with the aim of supporting local authorities in both the content and preparation of their Local Authority Climate Action Plans. The Guidelines were issued by the Department of the Environment, Climate, and Communications in March 2023.

The Draft Plan sets out how South Dublin County Council will be responsible for enhancing climate resilience, increasing energy efficiency and reducing greenhouse gas emissions, across its own assets, services and infrastructure, to which it is ‘fully accountable’ for, whilst also demonstrating a broader role of ‘influencing’, ‘coordinating and facilitating’ and ‘advocating’ for other sectors, to meet their own climate targets and ambitions.

This is necessary to ensure that the environmental, social and economic benefits associated with climate action, can be fully realised, thereby facilitating a Just Transition. The Council will also continue its efforts in rolling out ambitious climate action projects, drawing down available sources of funding, pursuing citizen and stakeholder engagement, all supported by a progressive policy framework.



## 2 The Public Consultation Process

### 2.1 Outline of the Public Consultation Process

In accordance with the provisions of Section 16 of the Climate (Amendment) Act 2021, the Draft Climate Action Plan underwent statutory public consultation, from Wednesday 20<sup>th</sup> September 2023 to Friday 3<sup>rd</sup> November 2023, inclusive.

The Climate (Amendment) Act 2021 states, that in making the local authority climate action plan, a local authority shall:

- (a) consult and co-operate with adjoining local authorities;
- (b) consult with the Public Participation Network in the administrative area of the local authority and such other persons as the local authority considers appropriate;
- (c) co-ordinate, where appropriate, with adjoining local authorities in relation to the mitigation measures and adaptation measures to be adopted;
- (d) consider any significant effects the implementation of the local authority climate action plan may have on adjoining local authorities; and
- (e) consider any submissions made to it by an adjoining local authority.

The Act also states that a local authority shall, before making a local authority climate action plan:

- (a) publish, in such manner as the local authority considers appropriate, a draft of the proposed local authority climate action plan;
- (b) publish a notice on the internet and in at least one newspaper circulating in the administrative area of the local authority inviting members of the public and any interested parties to make submissions in writing in relation to the proposed local authority climate action plan within such period (not exceeding two months from the date of the publication of the notice) as may be specified in the notice; and
- (c) have regard to any submissions made pursuant to, and in accordance with, a notice under paragraph (b).

### 2.2 Key Elements of the Public Consultation Process

Before the Draft Climate Action Plan was published, pre-draft engagement activities were carried out to develop the Draft Plan, by gathering insights and contributions from internal and external stakeholders, which included the following:

- Early Engagement Workshops with Elected Members and all Strategic Policy Committees (SPCs) prior to Public Consultation, held on 7<sup>th</sup> and 8<sup>th</sup> June 2023.
- An update on Draft CAP preparation was given at each of the Environment, Public Realm and Climate Change SPC Meetings, held on 7<sup>th</sup> February, 2<sup>nd</sup> May and 5<sup>th</sup> September 2023.
- An update on Draft CAP preparation was given at Corporate Policy Group (CPG) Meetings, held on 6<sup>th</sup> March, 2<sup>nd</sup> June and 2<sup>nd</sup> October 2023.
- Chief Executive Monthly Reports – articles, including notifying of Draft Plan preparation.
- Meeting and follow-up workshop with Senior Management, held on 17<sup>th</sup> April 2023.

- Workshops with each of the six Climate Action Sub Teams held on 9<sup>th</sup>, 10<sup>th</sup>, 17<sup>th</sup> May 2023.
- Meetings with Climate Action Steering Group, 22<sup>nd</sup> May 2023.
- Monthly meetings as chaired by the Dublin Climate Action Regional Office (CARO)
  - Coordination with the Dublin local authorities and Codema – Dublin's Energy Agency, on the preparation of the Draft Plans.
  - Meeting with adjoining Dublin local authorities, Meath, Wicklow and Kildare local authorities held on Friday 28<sup>th</sup> July 2023.
- Stands in Staff Canteen for visioning exercise, 29<sup>th</sup>, 31<sup>st</sup> May 2023 and ongoing engagement with wider council staff.
- Online Staff survey, 2<sup>nd</sup> – 27<sup>th</sup> June 2023.
- Climate Action questions in the Clondalkin Local Area Plan (LAP) Pre-Draft public consultation survey, issued end of April 2023.
- Internal emails, Internal Summer Newsletter, intranet 26<sup>th</sup> May – 27<sup>th</sup> June 2023, internal TV's.
- Citizen Newsletter - published Summer and Winter 2023 editions.

The Draft Plan, with accompanying SEA & AA reports, was physically on display at a number of locations throughout the County, during the statutory public consultation period, including:

- County Hall, Tallaght;
- Clondalkin Civic Offices;
- County Library, Library Square, Tallaght;
- Ballyroan Library, Orchardstown Avenue, Rathfarnham;
- Clondalkin Library, Monastery Road, Clondalkin;
- Lucan Library, Lucan Shopping Centre, Newcastle Road, Lucan;
- North Clondalkin Library, Liscarne Close, Rowlagh; and
- Castletymon Library, Tallaght.

Written submissions could be made through one of the following two options only:

- Electronically through the Council's Online Public Consultation Portal - <http://consult.sdublincoco.ie>
- In writing, addressed to the Senior Engineer, Climate Action, Environment, Water and Climate Change Department, County Hall, Tallaght, Dublin 24

### 2.3 Public Information Events

Notice of the public consultation was advertised in national and local newspapers, per Appendix II. NewsGroup published an article on October 7<sup>th</sup> 2023, with details on how to make submissions, including viewing availability of hard copies of the Draft Plan, SEA and AA documents in County libraries:

[South Dublin County Council Draft Climate Action Plan 2024- 2029 published | NewsGroup](#)

During the public consultation period, a number of Public Information Events took place, as follows:

**Table 1: Public Consultation Events**

Public Consultation Events	Date
Edge café, The Edge, Avonmore Rd, Tallaght, Dublin 24, D24 K07Y (see Figure 1).	5-9pm on Wednesday 4 <sup>th</sup> October
Lucan Presbyterian Church, 2 Hanbury Ln, Main St, Lucan, Co. Dublin, K78 AD90.	3-7pm on Wednesday 11 <sup>th</sup> October
Clondalkin Civic Offices, Ninth Lock Rd, Clondalkin, Dublin 22, D22 E9X5.	3-7pm on Thursday 12 <sup>th</sup> October
Mansion House, Dublin, the four Dublin local authorities hosted a joint event, with guest speakers and activities (see Figure 2).	3-8pm on Tuesday 17 <sup>th</sup> October



Figure 1: Public Consultation event, Edge café, Tallaght



Figure 2: Four Dublin local authorities Public Consultation event, Mansion House, Dublin

**Table 2: Pop-Up Draft Climate Action Plan Information Stand in SDCC Libraries**

Pop-Up Draft Climate Action Plan Events	Date
Tallaght Library, Dublin D24A3EX	3-5pm on Monday 9 <sup>th</sup> October
Castletymon Library, Tallaght	2-4pm on Friday 13 <sup>th</sup> October
Ballyroan Library, Rathfarnham, D14 VY33	3-5pm on Wednesday 18 <sup>th</sup> October
Lucan library, Newcastle Road, Lucan, Dublin	3-5pm on Wednesday 25 <sup>th</sup> October
Clondalkin Library, D22 XPO3	3-5pm on Thursday 26 <sup>th</sup> October
North Clondalkin Library, D22 E2Y2	3-5pm on Tuesday 31 <sup>st</sup> October

## 2.4 Engagement with Key Stakeholders

During the public consultation period, a number of briefings took place at SDCC Area Council Meetings (ACM's) as follows:

**Table 3: Engagement at SDCC Area Council Meetings**

Area Council Meetings (ACM's)	Date
Rathfarnham, Templeogue, Firhouse, Bohernabreena ACM	3-6pm on Tuesday 10 <sup>th</sup> October
Clondalkin, Newcastle, Rathcoole, Saggart, Brittas ACM	3-6pm on Wednesday 18 <sup>th</sup> October
Tallaght ACM	3-6pm on Monday 23 <sup>rd</sup> October
Lucan, Palmerstown & North Clondalkin ACM	3-6pm on Tuesday 24 <sup>th</sup> October

## SDCC Social Media Posts

A range of awareness raising and social media campaigns took place throughout the public consultation process, as follows:

**Table 4: Twitter Posts**

Date	Link
10/23/2023	<a href="https://twitter.com/sdublincoco/status/1716462053404090489">https://twitter.com/sdublincoco/status/1716462053404090489</a>
10/11/2023	<a href="https://twitter.com/sdublincoco/status/1712091281587888178">https://twitter.com/sdublincoco/status/1712091281587888178</a>
10/23/2023	<a href="https://twitter.com/sdublincoco/status/1716426120315162696">https://twitter.com/sdublincoco/status/1716426120315162696</a>
10/17/2023	<a href="https://twitter.com/sdublincoco/status/1714310306044821566">https://twitter.com/sdublincoco/status/1714310306044821566</a>
10/16/2023	<a href="https://twitter.com/sdublincoco/status/1713842341755097197">https://twitter.com/sdublincoco/status/1713842341755097197</a>
10/10/2023	<a href="https://twitter.com/sdublincoco/status/1711668335018914125">https://twitter.com/sdublincoco/status/1711668335018914125</a>
10/10/2023	<a href="https://twitter.com/sdublincoco/status/1711668335018914125">https://twitter.com/sdublincoco/status/1711668335018914125</a>
09/20/2023	<a href="https://twitter.com/sdublincoco/status/1704481144014606668">https://twitter.com/sdublincoco/status/1704481144014606668</a>
10/18/2023	<a href="https://twitter.com/sdublincoco/status/1714567034074181733">https://twitter.com/sdublincoco/status/1714567034074181733</a>
10/03/2023	<a href="https://twitter.com/sdublincoco/status/1709108527531237459">https://twitter.com/sdublincoco/status/1709108527531237459</a>
10/04/2023	<a href="https://twitter.com/sdublincoco/status/1709491182290551054">https://twitter.com/sdublincoco/status/1709491182290551054</a>
10/12/2023	<a href="https://twitter.com/sdublincoco/status/1712392822576369814">https://twitter.com/sdublincoco/status/1712392822576369814</a>
10/26/2023	<a href="https://twitter.com/sdublincoco/status/1717549197895864446">https://twitter.com/sdublincoco/status/1717549197895864446</a>
10/23/2023	<a href="https://twitter.com/sdublincoco/status/1716425922306355669">https://twitter.com/sdublincoco/status/1716425922306355669</a>

**Table 5: Facebook Posts**

Date	Link
10/23/2023	<a href="https://facebook.com/159457194097006_719093260259684">https://facebook.com/159457194097006_719093260259684</a>
10/23/2023	<a href="https://facebook.com/159457194097006_719018156933861">https://facebook.com/159457194097006_719018156933861</a>
10/17/2023	<a href="https://facebook.com/159457194097006_715459523956391">https://facebook.com/159457194097006_715459523956391</a>
10/11/2023	<a href="https://facebook.com/159457194097006_711416904360653">https://facebook.com/159457194097006_711416904360653</a>
10/04/2023	<a href="https://facebook.com/159457194097006_706999288135748">https://facebook.com/159457194097006_706999288135748</a>

**Table 6: Instagram Posts**

Publish time	Link
10/04/2023	<a href="https://www.instagram.com/p/Cx-LI8jt7z2/">https://www.instagram.com/p/Cx-LI8jt7z2/</a>
10/10/2023	<a href="https://www.instagram.com/p/CyNtMLNCNF6/">https://www.instagram.com/p/CyNtMLNCNF6/</a>
10/16/2023	<a href="https://www.instagram.com/p/CyDJ_eqMR75/">https://www.instagram.com/p/CyDJ_eqMR75/</a>
10/16/2023	<a href="https://www.instagram.com/p/CydsS6CIs6_/">https://www.instagram.com/p/CydsS6CIs6_/</a>
10/17/2023	<a href="https://www.instagram.com/p/Cyfdk82RABs/">https://www.instagram.com/p/Cyfdk82RABs/</a>
10/17/2023	<a href="https://www.instagram.com/p/CygRlxoklc/">https://www.instagram.com/p/CygRlxoklc/</a>
10/22/2023	<a href="https://www.instagram.com/p/CytP9LBsoUe/">https://www.instagram.com/p/CytP9LBsoUe/</a>
10/25/2023	<a href="https://www.instagram.com/p/Cy0-TgiBkZB/">https://www.instagram.com/p/Cy0-TgiBkZB/</a>
11/02/2023	<a href="https://www.instagram.com/p/CzJrkDfBtF0/">https://www.instagram.com/p/CzJrkDfBtF0/</a>
09/28/2023	<a href="https://www.instagram.com/p/CxvZaMeI7DI/">https://www.instagram.com/p/CxvZaMeI7DI/</a>
09/20/2023	<a href="https://www.instagram.com/p/Cxah4_UsuL5/">https://www.instagram.com/p/Cxah4_UsuL5/</a>

An overview of the Draft Climate Action Plan was delivered as part of a presentation to Technological University Dublin (TD) - Tallaght Green Campus and Tallaght Tidy Towns on Thursday 14<sup>th</sup> September from 2 – 3pm.

An Taisce's Climate Ambassador Programme published two separate articles on the Dublin local authorities Draft CAP public consultations, included in their internal newsletters (reach 1,000+).

### 3 Details of the Submissions

#### 3.1 Introduction

A total of 32 valid submissions and observations were received, the breakdown of which is as follows:

<b>Submission Type</b>	<b>Number</b>
Online Portal Submissions	30
Posted / Handed Submissions	2
<b>Total Submissions</b>	<b>32</b>

All valid submissions and observations were read, analysed and summarised. An overview of issues raised is provided in Section 3.3. The categorisation and summary of issues raised, together with the Chief Executive's (CE) response and recommendations, is contained in Section 4.

Three invalid submissions were received, after the statutory public consultation deadline of Friday 3<sup>rd</sup> November 2023. One of these submissions was received from the Department of Agriculture, Food and the Marine. The general contents of these submissions are noted.

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 Action Plan document.

#### 3.2 List of Persons, Organisations and Bodies who made Submissions

Appendix I lists the persons, organisations and bodies that made written submissions. Each submission has been assigned an independent reference. A link to each full submission is also available in Appendix I.

#### 3.3 Summary of Issues Raised in Submissions

There were 32 valid submissions and observations received for the South Dublin County Council Draft Climate Action Plan; these were read, analysed and summarised. A total of 238 broad issues were identified from the submissions and observations received. Full summaries of all of the issues raised in the submissions and observations are set out in Section 4, together with the responses and recommendations of the Chief Executive. Issues have been summarised under the relevant chapter, subsection or appendix heading in Section 4 of this report.

Table 7 sets out the number and percentage of broad issues that were raised according to the relevant chapter, subsection or appendix heading of the Draft Climate Action Plan.

**Table 7: Submission Issue Breakdown**

<b>Submission Heading</b>	<b>No. of Issues Raised</b>	<b>% of Issues Raised</b>
Department of the Environment, Climate and Communications	3	1.3%
Department of Transport	17	7.1%
Section 1: Introduction	6	2.5%
Section 2: Climate Action Plan Process	5	2.1%
Section 3: Evidence Based Climate Action	12	5%
Section 4: Responding to Risks - Emergency Response Planning	2	0.8%
Section 5a Energy & Buildings	32	13.4%
Section 5b Transport	50	21%
Section 5c Flood Resilience	13	5.5%
Section 5d Nature-based Solutions	38	16%
Section 5e Circular Economy and Resource Management	19	8%
Section 5f Community Engagement	22	9.2%
Section 6 Decarbonizing Zone	3	1.3%
Section 7 Implementation & Reporting	8	3.4%
Strategic Environmental Assessment (SEA) and Appropriate Assessment	8	3.4%
<b>Total</b>	<b>238</b>	<b>100%</b>

### 3.4 Chief Executive's Responses and Recommendations

The Chief Executive has prepared a response and recommendation under the relevant Section / Submission heading of the Draft Climate Action Plan. The listing and format of the categorisation, summary and responses to issues raised, follows the document structure of the Draft Climate Action Plan.

This Chief Executive report examines issues raised in the submissions and observations, in the context of their relevance to the purpose and scope of the Draft Climate Action Plan, seeks to incorporate new/additional provisions where they are relevant to the purpose of the Plan, its implementation and do not have a negative impact on the broader environmental considerations of the area.

In the interests of clarity, issues raised in submissions and observations that:

- do not sit within the scope of the Draft Climate Action Plan;
- go beyond its scope but lie within the scope of the local authority;
- go beyond the functions of the local authority; and/or
- are not directly related to the provisions of the Draft Plan or climate actions,

will be subject to general commentary where appropriate and may not be considered further to help inform the provisions or actions of the final Climate Action Plan.

Among the issues specifically not addressed, commented on or responded to in this report, include matters relating to planning applications, development sites or programmes in the remit of national or other external bodies. Such matters are best addressed under the various planning processes including development management, forward planning, other policies and legislation etc. Matters that are considered helpful to frame future policy will be considered,

where such considerations do not undermine the integrity of the functions and processes stated above.

### 3.5 Structure of Proposed Modifications to the Plan

Proposed Modifications to the text of the Draft Climate Action Plan are identified by their location within the Draft Plan e.g. Section 1 Executive Summary.

As stated in Section 3.4.2 of the Local Authority Climate Action Plan Guidelines, **'a modification in this instance is an alteration that is considered non-material and does not compromise the integrity of the plan-making process to that point or the SEA and AA processes that have informed the plan'** (Government of Ireland, 2023).

Furthermore, given the statutory twelve (12) month duration of the Plan making process, as set out in Section 16 of the Climate (Amendment) Act 2021, **a Material Amendment public consultation phase, is not provided for under the legislation.**

Non-material modifications to the text of the Draft Climate Action Plan are shown in **green text**, for example:

**Engage with communities and residents across the County, through local pop-up awareness raising events, on home energy upgrades, funding and other supports available.**

Deletions to the text of the Draft Climate Action Plan are shown in **red text with strikethrough**, for example:

~~The National Climate Action Plan 2023, launched on 21<sup>st</sup> December 2022, is the second annual update to the States' Climate Action Plan 2019, and the first to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021. It followed the introduction in 2022 of economy-wide carbon budgets and sectoral emission ceilings. Climate Action Plan 2023 (CAP23) sets out a roadmap to 2025 towards taking decisive action to halve emissions by 2030 and reach net zero, no later than by the end of 2050, as committed to in the Programme for Government.~~

#### 4 Categorisation, Summary and Responses to Issues Raised

All 32 valid submissions and observations were read, analysed and summarised. The report takes the following format to address issues raised in the submissions and observations received.

##### 4.1 Submission from the Department of the Environment, Climate and Communications

Issue	Issue Summary	CE Response and Recommendation
Climate Action Plan Process	<ul style="list-style-type: none"> <li>• The LA CAP shall, in so far as practicable, be consistent with the most recent approved climate action plan and national adaptation framework. In making a LA CAP, a local authority shall have regard to (a) the most recent approved national long term climate action strategy, (b) the most recent approved sectoral adaptation plans, and (c) any policies of the Minister or the Government on climate change. (SD-C292-CAP-32)</li> <li>• In making the plan, a local authority shall consult and co-operate with adjoining local authorities, consult with the Public Participation Network in the administrative area of the local authority and such other persons as the local authority considers appropriate; and, co-ordinate, where appropriate, with adjoining local authorities in relation to the mitigation measures and adaptation measures to be adopted. It shall consider any significant effects the implementation of the LA CAP may have on adjoining local authorities, and consider any submissions made to it by an adjoining local authority under subsection (5)(c). (SD-C292-CAP-32)</li> <li>• Each local authority is required to identify a Decarbonising Zone (DZ) in their jurisdiction within their LA CAP. (SD-C292-CAP-32)</li> </ul>	<p><b>CE Response</b></p> <p>The Draft Plan has been developed in accordance with the Local Authority Climate Action Plan Guidelines, as published by the Department of the Environment, Climate and Communications.</p> <p>As stated in the Draft Plan, South Dublin County Council works closely with the other Dublin local authorities (Dublin City Council, Fingal County Council, and Dún Laoghaire-Rathdown County Council) and is supported in the delivery of climate action by the Dublin Climate Action Regional Office (CARO) and Codema – Dublin’s Energy Agency.</p> <p>As outlined in Section 6 of the Draft Plan, SDCC has selected an area of Clondalkin, in which to establish a Decarbonising Zone (DZ).</p> <p><b>CE Recommendation</b></p> <p>No Change to the Draft Plan.</p>

## 4.2 Submission from the Department of Transport

Issue	Issue Summary	CE Response and Recommendation
Active Travel Projects	<ul style="list-style-type: none"> <li>Local Authorities have a key role in delivery of active travel programmes by expanding walking and cycling facilities in their areas, including shared mobility services, and enhancing the public realm to increase safety and connectivity for pedestrians and cyclists by retrofitting existing infrastructure and providing new infrastructure. (SD-C292-CAP-7)</li> <li>Local Authorities can facilitate the integration of safe and convenient alternatives to the private car into the design of local communities in line with Transport Orientated Development principles and by prioritising walking and cycling accessibility to both existing and proposed developments. (SD-C292-CAP-7)</li> <li>Two cycling strategies are due to be published in the coming months that set out a cohesive cycling infrastructure network. The National Cycle Network (NCN) and CycleConnects. These two strategies will inform future investment by Local Authorities in the coming years. (SD-C292-CAP-7)</li> </ul>	<p><b>CE Response</b></p> <p>As outlined in the Transport Section of the Draft Plan, promoting Active Travel is one of the Council's key action areas to address transport related emissions across the County.</p> <p>The range of Active Travel actions contained in the Draft Plan will progress opportunities to make walking and cycling more attractive and viable and target reasons that people choose not to cycle, with the goal of making the County one of Ireland's most cycle friendly counties.</p> <p>The Active Travel actions contained in the Draft Plan, will also provide people of all ages and abilities with a well-connected, well designed and safe cycle network, that offers citizens a credible alternative to using the private car.</p> <p>The Cycle South Dublin Programme commenced in 2021, with significant progress made on a range of projects. The identification of additional schemes will be undertaken in collaboration with the Department of Transport, National Transport Authority and other stakeholders, as relevant.</p> <p><b>CE Recommendation</b></p> <p>No Change to the Draft Plan.</p>

<p>Engagement on Active Travel</p>	<ul style="list-style-type: none"> <li>• There is a need for increased awareness and clear messaging on the benefits of shifting away from private car use towards sustainable mobility. (SD-C292-CAP-7)</li> <li>• Behavioural change campaigns and community engagement that encourage a modal shift to transport modes with zero or low carbon emissions, such as active travel (walking, wheeling, and cycling) and public transport, are a key part of the overall mix of solutions needed to meet our targets. (SD-C292-CAP-7)</li> <li>• There is a need for increased awareness and clear messaging on the benefits of shifting away from private car use towards sustainable mobility. (SD-C292-CAP-7)</li> <li>• Local authorities have responsibilities on climate action including influencing sectors, business, communities, and individuals in the delivery of local climate action through the various functions and services provided. (SD-C292-CAP-7)</li> </ul>	<p><b>CE Response</b></p> <p>As outlined in the Transport Section of the Draft Plan, promoting Active Travel is one of the Council's key action areas to address transport related emissions across the County.</p> <p>The range of Active Travel actions contained in the Draft Plan will progress opportunities to make walking and cycling more attractive and viable and target reasons that people choose not to cycle, with the goal of making the County one of Ireland's most cycle friendly counties.</p> <p>In conjunction with the implementation of active travel projects, public engagement initiatives, awareness and education campaigns, also have an important role to play.</p> <p>The Draft Plan contains a number of Actions in relation to this issue, including T5, T12, T13, T15. This includes the Council's Active Travel website, <a href="https://www.sdcc.ie/en/active-travel/">https://www.sdcc.ie/en/active-travel/</a> which is updated regularly, to keep the public informed on project updates.</p> <p>The Council also propose to run a series of Active Travel Roadshows across the County in 2024, to promote the benefits of Active Travel.</p> <p><b>CE Recommendation</b></p> <p>No Change to the Draft Plan.</p>
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<p>Transport Planning</p>	<ul style="list-style-type: none"> <li>• In addition to the large number of actions to be delivered at Local Authority level - such as new infrastructure for walking and cycling, including those projects being delivered under the Pathfinder Programme – the SMP specifically identifies Local Authorities as lead partners in the development of pedestrian enhancement plans, the implementation of local transport plans, and the delivery of metropolitan transport strategies. (SD-C292-CAP-7)</li> <li>• The importance and role of integrated land use and transport planning in meeting our climate commitments should be addressed in the LA Climate Action Plan. (SD-C292-CAP-7)</li> <li>• At local level, the preparation of local transport plans, in consultation with the National Transport Authority and Transport Infrastructure Ireland, should set mode share targets in order to support a significant shift to active and sustainable modes and the reduction in private car trips in the short to medium-term. (SD-C292-CAP-7)</li> </ul>	<p><b>CE Response</b></p> <p>The Transport Section of the Draft Plan includes seven key action areas to address transport related emissions across the County, including active travel and embedding modal shift in communities.</p> <p>The range of Active Travel actions contained in the Draft Plan will progress opportunities to make walking and cycling more attractive and viable and target reasons that people choose not to cycle, with the goal of making the County one of Ireland's most cycle friendly counties and reduce greenhouse gas emissions from the transport sector.</p> <p>With regard to development across the County, climate action and transport are core policy objectives of the County Development Plan (CDP) 2022-28. The promotion of a compact urban form of development, is a central part of mitigating climate change. The range of policies and objectives of the CDP seek to provide for a consolidated urban form within existing settlements, that are integrated with existing and planned public transport and the delivery of social and physical infrastructure.</p> <p><b>CE Recommendation</b></p> <p>No Change to the Draft Plan.</p>
<p>Electric Vehicles</p>	<ul style="list-style-type: none"> <li>• Local Authorities have an important role in developing local area networks for EV (electric vehicles) charging infrastructure to meet the needs of their residents who cannot charge their</li> </ul>	<p><b>CE Response</b></p> <p>As outlined in the Transport Section of the Draft Plan, Electric Vehicle Charging, is one of the</p>

	<p>vehicles at home, and, through the co-location of shared mobility services, to meet the needs of residents who do not own vehicles. (SD-C292-CAP-7)</p> <ul style="list-style-type: none"> <li>• The installation of EV infrastructure to facilitate the transition to EVs is an essential component of this transition. Local Authorities will be developing their EV Infrastructure Strategies for 2025 to 2030 in the coming months which will be carried out in accordance with the National EV Infrastructure Strategy 2022- 2025 National EV Charging Network Plan- En Route which was released for public consultation September 2023 National EV Charging Network Plan - Residential and Destination (for public consultation Q1 2024) Action Plans. (SD-C292-CAP-7)</li> </ul>	<p>Council’s key action areas to address transport related emissions across the County. There are a number of Actions included in the Draft Plan relating to electric vehicle charging.</p> <p>The Dublin Region represents approximately 25% of Ireland’s car fleet and has a significant role to play in the decarbonisation of the country’s transport system. SDCC, in collaboration with the other three Dublin local authorities, have developed the Dublin Local Authority Electric Vehicle Charging Strategy 2022-2030, to support the transition to electric vehicles. It sets out how the Dublin local authorities’ role in facilitating a coordinated approach to the deployment of EV charging infrastructure. The Dublin local authorities continue to engage with Zero Emissions Vehicles Ireland (ZEV), on implementing the strategy.</p> <p>On behalf of the four Dublin local authorities, Codema – Dublin’s Energy Agency is currently undertaking a Public EV Charging Services Tender, which includes proposed sites at Council-owned car parks.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
Road Space Reallocation	<ul style="list-style-type: none"> <li>• Local Authority climate action plans also should recognise the continued need to identify additional measures to deliver the level of ambition required. This includes, amongst others, the identification and implementation of further road space</li> </ul>	<p><b>CE Response</b> As outlined in the Transport Section of the Draft Plan, promoting Active Travel is one of the</p>

	<p>reallocation opportunities, pedestrian and cycling enhancement plans as well as various demand management measures. (SD-C292-CAP-7)</p> <ul style="list-style-type: none"> <li>• From an urban perspective this can relate to the re-allocation to other uses such as for road safety, other uses such as cycling, walking etc or for public realm. DMURS is the principal design standard for all Urban Roads and is to be used in all cases except where a formal derogation has been granted by an oversight body such as TII, NTA or DoT (Regional and Local Roads Division). (SD-C292-CAP-7)</li> </ul>	<p>Council's key action areas to address transport related emissions across the County.</p> <p>The range of Active Travel actions contained in the Draft Plan will progress opportunities to make walking and cycling more attractive and viable and target reasons that people choose not to cycle, with the goal of making the County one of Ireland's most cycle friendly counties.</p> <p>Segregated cycling and walking routes are considered as part of Active Travel schemes, as appropriate. The level of segregation depends on a variety of factors, including location context, traffic movements, space availability and other matters. All schemes are designed having regard to the Design Manual for Urban Road and Streets (DMURS) and the national Cycle Design Manual.</p> <p>The Cycle South Dublin Programme commenced in 2021, with significant progress made on a range of projects. The identification of additional schemes will be undertaken in collaboration with the Department of Transport, National Transport Authority and other stakeholders, as relevant.</p> <p>The Council's Active Travel team will continue to liaise with internal and external stakeholders as projects are developed, to ensure the enhancement and safety of the public realm.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
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<p>Parking</p>	<ul style="list-style-type: none"> <li>For Local Authorities, one of the measures that they have the ability to affect the most in the short to medium term is on-street and non-residential parking. The national CAP23 encourages the removal of free workplace parking, the increasing of public parking prices to align with market rates, and where it complements measures that prioritise pedestrianisation, active travel and public transport, the removal of on-street parking spaces. Local Authorities should, where possible, align their climate action plans to support delivery of the above objectives as well as paired objectives relating to clean air. (SD-C292-CAP-7)</li> </ul>	<p><b>CE Response</b>  Vehicular parking across the County is addressed by way of the South Dublin County Council - Control of Parking Bye-Laws and as such these issues are beyond the scope of the Draft Plan.</p> <p>For development proposals across the County, a number of policies, objectives and parking standards are included in the County Development Plan 2022-28.</p> <p><b>CE Recommendation</b>  No Change to the Draft Plan.</p>
<p>Climate Adaptation and Transport</p>	<ul style="list-style-type: none"> <li>When revising and updating adaptation plans and actions for the new LACAPs, Local Authorities should consider the following relating to Transport infrastructure adaptation: <ul style="list-style-type: none"> <li>- Alignment with national Climate Action Plan adaptation actions for Transport infrastructure, including the potential for continued cross-sectoral collaboration (e.g. through CAROs) to support knowledge transfer and capacity-building;</li> <li>- Consideration of the most recent approved statutory Transport Sectoral Adaptation Plan findings, recommendations and actions.</li> <li>- Adaptation of critical transport infrastructure in the Local Authority area to climate change impacts (including extreme weather events) to facilitate access to airports, ports, rail and transport hubs in the medium to longer term as well as through national emergency planning structures. (SD-C292-CAP-7)</li> </ul> </li> <li>The potential for LA Transport adaptation considerations and infrastructure to contribute to wider environmental co-benefits at local and regional level, such as decarbonisation,</li> </ul>	<p><b>CE Response</b>  It is noted that regarding roads projects and climate adaptation, specific actions are included in the Draft Plan. Furthermore, the Council takes account of the Climate Action Regional Office (CARO) led guidance document, 'Guidance for Local Authorities on the Climate Adaptation of Regional and Local Roads' and other relevant plans and policies.</p> <p><b>CE Recommendation</b>  No Change to the Draft Plan.</p>

	<p>biodiversity, including through nature-based adaptation solutions; That LA climate mitigation actions, including those to support reductions in Transport-related carbon emissions do not give rise to maladaptation. (SD-C292-CAP-7)</p>	
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### 4.3 Submissions on Section 1 Introduction

Issue	Issue Summary	CE Response and Recommendation
<p>Draft CAP Vision</p>	<ul style="list-style-type: none"> <li>HSE suggest that the Draft CAP vision goes beyond quality of life and places stronger emphasis on protecting and promoting health and well-being, in the context of climate change to help deliver the vision of a Healthy Ireland. (SD-C292-CAP-30)</li> </ul>	<p><b>CE Response</b></p> <p>The Draft CAP Vision is ‘working together to ensure that South Dublin is a place with a strong focus on local living, sustainable mobility and quality of life for all, with leadership and initiative from South Dublin County Council, to develop a low carbon and climate resilient County by 2050’.</p> <p>The vision and targets of the Draft Plan are framed by the Climate Action and Low Carbon Development (Amendment) Act 2021 and the national Climate Action Plan. The Plan includes a range of actions for which the Council is ‘Fully Accountable’. The Plan is also outward focused and includes a range of actions for which the Council can ‘Influence’, ‘Coordinate and Facilitate’ and ‘Advocate’ for other sectors, in meeting their own climate and energy targets, thereby reflecting the Government’s National Climate Objective and an all of society reduction in greenhouse gas emissions of 51% by 2030.</p> <p>Actions in the Draft Plan are identified as being either adaptation or mitigation related. It is noted</p>

		<p>that some actions address both and have co-benefits. For example, parks and open spaces have a role in carbon sequestration, but also have an important function in surface water attenuation and helping to reduce the impacts of the urban heat island affect. Improved health and well-being are also co-benefits of the Draft Plan actions.</p> <p>A list of additional benefits arising from Draft CAP actions are included in each thematic section, these also refer to improved health and well-being.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Co-benefits, Health and Allotments/Community Gardens</p>	<ul style="list-style-type: none"> <li>• HSE suggest list of co-benefits for health could be expanded. For example, how climate action can help deliver more sustainable diets for the citizens of South Dublin through the promotion of allotments/community gardens. (SD-C292-CAP-30)</li> </ul>	<p><b>CE Response</b> The important role of community allotments and community gardens is recognised with regard to local food production. The Intergovernmental Panel on Climate Change has recognised that water, soil, biodiversity and food systems are all at risk due to climate change, making it essential that sustainability and resilience of the food system is addressed. This is also an important consideration in delivering a just transition to climate change.</p> <p>GI6 Objective 10 of the County Development Plan 2022-28 states to continue to protect and promote existing allotments and provide for new allotments where feasible, in accordance with a review of the provision and management of allotments across the County. The Council has published the</p>

		<p>Allotments Policy 2023, which sets out the process for allotment provision across the County. SDCC has made provision within the capital budget for the delivery / expansion of new allotments across the county.</p> <p>Having regard to the above, it is considered that a non-material modification be made to the Draft Plan regarding the provision of community allotments and community gardens.</p> <p>With regard to co-benefits, a list of additional benefits arising from Draft CAP actions are included in each thematic section, these also refer to improved health and well-being.</p> <p><b>CE Recommendation</b> The following new actions to be included in the Nature Based Solutions section of the Draft Plan:</p> <ul style="list-style-type: none"> <li>• <b>Maintain and expand allotments for local food production across the County, in accordance with SDCC's Allotments Policy.</b></li> <li>• <b>Support the provision of Community Gardens for local food production across the County, in partnership with Community Centres, Schools and other local groups.</b></li> </ul>
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<p>Agencies involved in Draft CAP</p>	<ul style="list-style-type: none"> <li>HSE suggest a list of agencies who participated or were consulted in the development of the plan is included as an appendix to the final plan. (SD-C292-CAP-30)</li> </ul>	<p><b>CE Response</b> Appendix I lists the persons, organisations and bodies that made written submissions to the Draft CAP. Each submission has been assigned an independent reference. A link to each full submission is also available in Appendix I.</p> <p>SDCC will continue to work collaboratively and in partnership with a range of key stakeholders, to support the implementation of the Draft CAP, including neighbouring local authorities, the Dublin Climate Action Regional Office (CARO), Codema - Dublin's Energy Agency, national and regional partners, elected members and local organisations and groups.</p> <p>In particular, a shared approach across the Dublin local authorities has been undertaken in the development of the Draft Plans. These partnerships can provide opportunities for collaboration on projects, shared learnings, technical support and leveraging funding opportunities.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Just Transition</p>	<ul style="list-style-type: none"> <li>HSE states that in the context of Sustainable Development Goal 3 – Health for All of All Ages, it is important to finalise a Climate Action Plan that is inclusive and leaves no one behind. The plan should be Age Friendly for older and younger persons, delivers for persons with a disability, by ensuring people are not impaired or excluded from active participation in their</li> </ul>	<p><b>CE Response</b> The implementation of the Draft CAP across all thematic areas, will facilitate a Just Transition across the County. A Just Transition means ensuring that the transition towards meeting the</p>

	<p>community, delivers for youth/adolescents, delivers for disadvantaged and marginalised groups, delivers for the future ethnic and cultural mix, and delivers for all genders, men, women, boys and girls. (SD-C292-CAP-30)</p>	<p>National Climate Objective, as set by Government, happens in a way that leaves no one behind.</p> <p>This is also reiterated in the national Climate Action Plan, which states 'delivering a just transition is based on recognising the transformational level of change required to meet these targets and having a shared understanding that the transition is fair, and just, and that the costs are shared equitably. Our climate policies should, therefore, seek to protect the most vulnerable.'</p> <p>The targets of the Draft Plan are framed by the Climate Action and Low Carbon Development (Amendment) Act 2021 and the national Climate Action Plan. The Plan includes a range of actions for which the Council is 'Fully Accountable'. The Plan is also outward focused and includes a range of actions for which the Council can 'Influence', 'Coordinate and Facilitate' and 'Advocate' for other sectors, in meeting their own climate and energy targets, thereby reflecting the Government's National Climate Objective and an all of society reduction in greenhouse gas emissions of 51% by 2030.</p> <p>Furthermore, as identified in the Register of Opportunities for the Clondalkin Decarbonising Zone, the Plan will explore and develop just transition opportunities in the DZ, such as skills training, and energy poverty reduction measures.</p>
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		<p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Draft CAP Targets</p>	<ul style="list-style-type: none"> <li>• HSE states that target three should seek to make Dublin a region resilient to climate threats that affect health but also seeks to deliver on the opportunities for health gain presented by climate action. For example, more active travel should deliver healthier people in terms of addressing physical inactivity and cleaner air. (SD-C292-CAP-30)</li> <li>• HSE states target four should go beyond engaging and informing our communities on climate action, to seek to effect behaviour change and enable for example, to make the healthy choice for people the easy choice. In the context of the latest Climate Action Plan 2023, this may refer to the delivery of “Climate Literacy”. (SD-C292-CAP-30)</li> </ul>	<p><b>CE Response</b> The Draft Plan has been developed in accordance with the Local Authority Climate Action Plan Guidelines, as published by the Department of the Environment, Climate and Communications.</p> <p>The range of actions included in the Draft CAP are based on the following targets:</p> <ul style="list-style-type: none"> <li>• 50% improvement in the Council’s energy efficiency by 2030;</li> <li>• 51% reduction in the Council’s greenhouse gas (GHG) emissions by 2030;</li> <li>• To make Dublin a climate resilient region, by reducing the impacts of future climate change-related events; and</li> <li>• To actively engage and inform our communities on climate action.</li> </ul> <p>The targets of the Draft Plan are framed by the Climate Action and Low Carbon Development (Amendment) Act 2021 and the national Climate Action Plan. The Plan includes a range of actions for which the Council is ‘Fully Accountable’. The Plan is also outward focused and includes a range of actions for which the Council can ‘Influence’, ‘Coordinate and Facilitate’ and ‘Advocate’ for other sectors, in meeting their own climate and energy targets, thereby reflecting the Government’s National Climate Objective and an</p>

		<p>all of society reduction in greenhouse gas emissions of 51% by 2030.</p> <p>On this basis, the wording of the Draft Plan targets are overarching and are intended to reflect the broad ranging benefits of taking climate action.</p> <p>Furthermore, a list of additional benefits arising from Draft CAP actions are included in each thematic section, these also refer to improved health and well-being.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
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#### 4.4 Submissions on Section 2 The Climate Action Plan Process

Issue	Issue Summary	CE Response and Recommendation
Climate Proofing	<ul style="list-style-type: none"> <li>SDCC Green Party Councillors state 'Climate Proofing' criteria should be developed for assessing planning applications. (SD-C292-CAP-22)</li> </ul>	<p><b>CE Response</b></p> <p>Mainstreaming climate proofed solutions across SDCC through governance, is a priority of the Draft Plan. Across the thematic sections of the Draft plan, a number of governance actions are included. In particular, Action Gov4 relates to ensuring climate-proofing of all SDCC policies and strategies, including updates through liaison with the Climate Action Team.</p> <p>The County Development Plan 2022-2028 identifies policies and objectives, with a specific focus on climate action. In addition, each Development Plan chapter includes a climate audit</p>

		<p>providing an overview of measures included in the CDP, to address climate change.</p> <p>Planning applications are assessed against the policies and objectives in the Development Plan and as such climate measures are assessed as part of development proposals.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>European Union (EU) Funding</p>	<ul style="list-style-type: none"> <li>MEP Ciaran Cuffe states that an action to apply for EU funding for climate friendly urban projects, is absent from this CAP. Dublin City Council have included an action to do so, and South Dublin County Council could benefit hugely from EU money to fund some of its green transition and to help achieve the four Dublin council’s goal of turning the county into a climate resistant region. (SD-C292-CAP-21)</li> </ul>	<p><b>CE Response</b> As detailed in the Implementation and Reporting section of the Draft CAP, the Climate Action Plan will be implemented by all departments of the Council, using a variety of funding streams. This includes both the Council’s Capital and Revenue budgets and a range of external sources of funding.</p> <p>To assist in the delivery of targets for the Council’s own greenhouse gas emissions and energy usage, substantial funding is provided for in the Council’s 2024 Budget, to expand the existing climate action programme. Further information on the Council Budget is available at: <a href="https://www.sdcc.ie/adopted-budget-book-2024-v1-21-11-2023.pdf">adopted-budget-book-2024-v1-21-11-2023.pdf (sdcc.ie)</a></p> <p>The Council will continue to work with Codema, the Dublin Climate Action Regional Office and others, to identify funding and other supports available regarding the implementation of the Draft Plan. This will include EU sources of funding.</p>

		<p>As stated in the Implementation and Reporting section of the Draft CAP 'a Dublin regional approach has been agreed by the four Dublin local authorities, whereby they can collaborate closely in the implementation of their respective Climate Action Plans. These partnerships can provide opportunities for collaboration on projects, shared learnings, technical support and leveraging of funding opportunities during the Plan's implementation.</p> <p>It is noted that SDCC continues to have a track record in leveraging EU funding for projects. Such projects include the Interreg North West Europe HeatNet project (Tallaght District Heating Scheme) and more recently the EU Horizon 2020 DeliveREE project, which will support the roll out of over €20m worth of energy projects in Dublin, working with SDCC and the three other Dublin local authorities.</p> <p>Furthermore, the Dublin Urban Rivers LIFE (DURL) Project is a collaboration between South Dublin County Council, Dún Laoghaire-Rathdown County Council and the EU LIFE Programme.</p> <p>In consideration of the submission received and the significant opportunity presented by EU funding sources, it is considered that a specific Action in this regard, should be included in the Draft Plan.</p>
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		<p><b>CE Recommendation</b> The following new action to be included in the Energy &amp; Buildings section of the Draft Plan:</p> <ul style="list-style-type: none"> <li>• <b>Maximise opportunities to avail of funding sources, to support a range of climate action projects across the County, including European Union (EU) funding streams.</b></li> </ul>
Plans and Policies Alignment	<ul style="list-style-type: none"> <li>• Environmental Protection Agency (EPA) states the Plan should include a commitment to remain aligned with high level plans and programmes, Guidelines, and legislation over its lifetime. The Climate Action Plan 2024 is currently being prepared and work will be commencing on the review of the National Planning Framework and Regional Spatial and Economic Strategies also. Any relevant updates of these plans/strategies should be integrated as appropriate into the Plan as relevant and appropriate. (SD-C292-CAP-5)</li> <li>• EPA are currently preparing the next iteration of the SOER (State of Environment Report) report, which will be published in 2024. We recommend that a commitment is made in the Plan, to take account of any relevant recommendations in the SOER 2024 report, once published, in implementing the Plan over its lifetime. (SD-C292-CAP-5)</li> </ul>	<p><b>CE Response</b> As detailed in Section 1 Introduction, the Draft CAP has been prepared having regard to a broad range of international, national, sectoral, regional and local plans, policies and legislation. The implementation of the Draft CAP and any variation or revision to the Plan, will have regard to all relevant plans and legislation, including those noted in the EPA submission.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>

#### 4.5 Submissions on Section 3 Evidence-Based Climate Action

Issue	Issue Summary	CE Response and Recommendation
Data Presentation and Consistency	<ul style="list-style-type: none"> <li>• Four Districts Woodland Habitat Group state Evidence Based Climate Action Figure 3.4 gives the GHG emissions for South Dublin based on data from 2018 and as a percentage. Is there</li> </ul>	<p><b>CE Response</b> Ireland has committed to reduce its emissions by a minimum of 51% by the year 2030. The 2030</p>

	<p>more recent data available? Can the tonnes/quantity be presented to communicate what this means in real terms? Proportions can mean very different things when it comes to quantity. (SD-C292-CAP-27)</p> <ul style="list-style-type: none"> <li>• Four Districts Woodland Habitat Group Data Presentation and Consistency on page 63, it states “In South Dublin, the transportation sector is the largest contributor to GHG emissions, with an estimated 42.5% of our total emissions.” Which is at odds with the 34% in Figure 3.4. (page 32) The figures stated need to tally. (SD-C292-CAP-27)</li> </ul>	<p>target corresponds to a 51% reduction from 2018 figures, as defined by the Programme for Government (2020), which states that Ireland is committed to an average 7% per annum reduction in overall greenhouse gas (GHG) emissions from 2018 to 2030 (a 51% reduction over the decade)’.</p> <p>The significance of the Dublin region in the Irish economy means that it is imperative to plan and commit to energy saving and CO<sub>2</sub> reductions at a local and regional level, in order to meet national level targets. As such, to create a baseline, 2018 was selected as the year with the latest data availability that mirrored national level analysis. Future iterations of the CAP will present updates on the emissions profile of South Dublin County.</p> <p>Carbon emissions are presented in tonnes of CO<sub>2</sub> equivalent or tCO<sub>2</sub>e, a standard unit of measurement for the comparative proportions of emissions sources. There are multiple greenhouse gas emissions considered in the emissions profile but for illustrative purposes and quantification, they have been converted to tCO<sub>2</sub>e in terms of environmental impact.</p> <p>Typographical error on page 63 of the Draft CAP is noted. Typographical errors in the Draft CAP will be corrected, in advance of publishing the final approved CAP in Q1 2024.</p>
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		<p><b>CE Recommendation</b>                  Typographical errors in the Draft CAP will be corrected, in advance of publishing the final approved CAP in Q1 2024.</p>
<p>Emissions Profile</p>	<ul style="list-style-type: none"> <li>• SDCC Green Party Councillors state specific inclusion of council owned stock in the reduction targets. Calculation of scope 3 emissions &amp; identification of reduction actions &amp; targets. A full Climate Risk Assessment should be carried out for the county. A clear statement that SDCC are aligned with the National Climate Objective and will work to reduce greenhouse gas emissions by 51% by 2030 both in those areas directly controlled by the Council and those where the council has indirect influence. Provide an estimate of current SDCC greenhouse gas emissions and an estimate of emissions if all planned actions are undertaken. (SD-C292-CAP-22)</li> <li>• HSE recommends that indirect or scope 2 and 3 emissions be considered in the emissions profile for SDCC, and actions include ways to reduce those emissions. Blended working arrangements for some staff is an example of a potential solution in this area. The EHS recommends that the need for cooling in summertime should be included in assessing energy demand for the three biggest emission sectors in South Dublin. (SD-C292-CAP-30)</li> </ul>	<p><b>CE Response</b>                  The Draft Plan has been developed in accordance with the Local Authority Climate Action Plan Guidelines as published by the Department of the Environment, Climate and Communications.</p> <p>The range of actions included in the Draft CAP are based on the following targets:</p> <ul style="list-style-type: none"> <li>• 50% improvement in the Council’s energy efficiency by 2030;</li> <li>• 51% reduction in the Council’s greenhouse gas (GHG) emissions by 2030;</li> <li>• To make Dublin a climate resilient region, by reducing the impacts of future climate change-related events; and</li> <li>• To actively engage and inform our communities on climate action.</li> </ul> <p>With regard to the National Climate Objective, the Draft Plan states ‘the targets of the Draft Plan are framed by the Climate Action and Low Carbon Development (Amendment) Act 2021 and the national Climate Action Plan. The Plan includes a range of actions for which the Council is ‘Fully Accountable’. The Plan is also outward focused and includes a range of actions for which the Council can ‘Influence’, ‘Coordinate and Facilitate’</p>

		<p>and 'Advocate' for other sectors, in meeting their own climate and energy targets, thereby reflecting the Government's National Climate Objective and an all of society reduction in greenhouse gas emissions of 51% by 2030.</p> <p>In the Draft CAP, Scope 1 and 2 emissions are accounted for in Figure 3.4: Total GHG Emissions for South Dublin per Sector 2018 (%). Scope 3 emissions are those considered outside the scope of direct fossil fuel emissions (Scope 1) and emissions generated offsite to produce electricity (Scope 2).</p> <p>Scope 3 emissions include but are not limited to, embodied emissions of purchased items, and the transportation of outputted products. In the analysis, only Scope 1 and Scope 2 emissions are considered, as aligned to the methodologies used for the national Climate Action Plan.</p> <p>Cooling in summertime could be included in the measures taken to assess energy demand in South Dublin's sectors. This methodology will be considered in collaboration with Codema – Dublin's Energy Agency.</p> <p>There are four Nature Based Solution Climate Actions N14, N15, N16 &amp; N17 specifically targeting increased temperatures and Urban Heat Island Effect and also Transport Climate Action T29.</p>
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		<p>A detailed Climate Change Risk Assessment is included as part of the Draft Plan, in accordance with the Local Authority Climate Action Plan Guidelines.</p> <p>With regard to SDCC greenhouse gas emissions the Draft Plan states that 'overall, the Council's GHG emissions have reduced by 31% since the 2018 baseline'. It is noted that annual SDCC emissions were estimated to be 12,022 tCO<sub>2</sub> for the 2018 GHG emissions baseline from the SEAI Monitoring and Reporting (M&amp;R) system. In collaboration with Codema – Dublin Energy Agency, the Council is quantifying the greenhouse gas emissions for a number of potential Council projects, aimed at a number of its Significant Energy Users.</p> <p>It is noted that SDCC operates a Blended Working Policy for staff, which assists in reducing the number of trips taken by private car.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
Monitoring	<ul style="list-style-type: none"> <li>SDCC Green Party Councillors state provide details of how monitoring of greenhouse gas emissions will be carried out. Include a carbon analysis in the 3-year capital programme. (SD-C292-CAP-22)</li> </ul>	<p><b>CE Response</b> Section 7 of the Draft Plan relates to Implementation and Reporting. This includes accounting for the Council's own energy performance under SEAI's Monitoring and Reporting system and wider local authority sectoral reporting for example to the National Oversight and Audit Committee (NOAC) and to the</p>

		<p>Department of the Environment, Climate and Communications.</p> <p>With the assistance of Codema, performance by SDCC on the delivery of emissions reduction and energy efficiency targets relating to the Council's assets and infrastructure, will continue to be tracked through the Monitoring and Reporting (M&amp;R) system managed by the Sustainable Authority of Ireland (SEAI).</p> <p>Furthermore, Table 6.1: Register of Opportunities for Clondalkin Decarbonising Zone includes, to develop a DZ data gathering and monitoring project to explore additional and complementary ways to track emissions and communicate progress.</p> <p>With regard to carbon analysis in the 3-year capital programme, a number of cross-cutting Governance actions are included in the Draft Plan, including Action GOV3 which relates to, ensuring that all new SDCC projects are assessed for the feasibility of incorporating climate actions and measures, with a focus on energy, greenhouse gas emissions, nature based Sustainable Drainage Systems (SuDS), enhancing and retaining Green Infrastructure (GI), biodiversity, sustainable transport and modal shift, EV charging, and environmental protection and co-benefits. All capital building projects are designed in accordance with Policy E3: Energy Performance in Existing and New Buildings of the County</p>
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		<p>Development Plan 2022-28, ensuring the impact of carbon usage is minimised through means of construction, operation, and maintenance.</p> <p>The delivery of these objectives is being supported by several current projects, including connecting new developments in Tallaght to the low carbon Tallaght District Heating scheme and the development of a pilot housing project using home-grown, lower embodied carbon timber frame construction, with the potential to be replicated both in South Dublin County and elsewhere.</p> <p>South Dublin County Council has a significant portfolio of properties. Critical to achieving the targets for carbon reduction undertaken by the Council (2030 and 2050) will be the reduction in the embodied and operational carbon footprints of these buildings. Targeted upgrades of the existing buildings are ongoing and supported by the Codema – Dublin’s Energy Agency. Analysis of the design and real-world life cycle analysis (LCA), will also support the achievement and verification of required carbon reductions.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
Reporting	<ul style="list-style-type: none"> <li>Councillor Derren Ó Brádaigh states a new and more ambitious target level of 60% energy efficiency improvement is aimed at as part of the Climate Change Action Plan 2024 – 2029. (SD-C292-CAP-10)</li> </ul>	<p><b>CE Response</b> The Draft Plan targets are as follows:</p>

	<ul style="list-style-type: none"> <li>SDCC Green Party Councillors indicate the prioritisation level of actions and the order in which actions are taken in the plan. (SD-C292-CAP-22)</li> </ul>	<ul style="list-style-type: none"> <li>50% improvement in the Council's energy efficiency by 2030;</li> <li>51% reduction in the Council's greenhouse gas (GHG) emissions by 2030;</li> <li>To make Dublin a climate resilient region, by reducing the impacts of future climate change-related events; and</li> <li>To actively engage and inform our communities on climate action.</li> </ul> <p>The Draft Plan targets are framed by the Climate Action and Low Carbon Development (Amendment) Act 2021 and the national Climate Action Plan. The Act and the national Climate Action Plan provide for a legally binding 51% reduction in overall greenhouse gas emissions by 2030, across society.</p> <p>With regard to 50% energy efficiency improvement, this relates to all public bodies (including local authorities), as set out in the national Climate Action Plan. The Council will work towards achieving and where possible, exceeding the Draft Plan targets.</p> <p>All actions in the Draft Plan are assigned across Council departments and will be developed and implemented over the lifetime of the Draft Plan. An annual Implementation Plan and approved budget, will also be prepared for the final CAP. At a strategic level, the Council's priorities for 2024 will focus on the following:</p>
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		<ul style="list-style-type: none"> <li>• Roll out the Community Climate Action Fund.</li> <li>• SDCC - Public Lighting, Decarbonise Buildings – DeliveREE.</li> <li>• Decarbonise Fleet and provide public EV charging infrastructure.</li> <li>• Undertake Clondalkin Decarbonising Zone Implementation Plan.</li> <li>• Expand Tallaght DH Scheme and Clonburris DH feasibility study.</li> <li>• Continue retrofit of Social Housing stock.</li> <li>• Expand Active Travel network.</li> <li>• Engage with DECC (Department of the Environment, Climate and Communications) on LA actions from national Climate Action Plan 2024 and other sectoral priorities.</li> <li>• Engage with Dublin CARO and Codema – Dublin’s Energy Agency on funding opportunities and other supports.</li> </ul> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Risk Assessment</p>	<ul style="list-style-type: none"> <li>• HSE state greater clarity in the risk assessment matrices on pages 39 (Fig. 3.7) and 42 (Fig. 3.9) would be welcome in relation to whether the impacts on the Y axes refer to those affecting the population or affecting service provision by SDCC. (SD-C292-CAP-19)</li> <li>• HSE recommends that SDCC adopt the principle of Do No Harm and to assess the potential risks to health and opportunities in everything it does. Impact may be positive but may be</li> </ul>	<p><b>CE Response</b> The Climate Change Risk Assessment for the Draft CAP has been developed in accordance with the methodology set out in the Local Authority Climate Action Plan Guidelines, as published by the Department of the Environment, Climate and Communications. The assessment undertaken provides for a range of climate impacts.</p>

	<p>negative. Impact may be intended but may also be unintended. (SD-C292-CAP-30)</p> <ul style="list-style-type: none"> <li>• Development Applications Unit state including objectives to carry out climate change risk assessments, including condition assessments, for the historic structures and sites in its area; Including objectives to develop disaster-risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area; (SD-C292-CAP-11)</li> <li>• Development Applications Unit recommends including objectives to develop resilience and adaptation strategies for the built and archaeological heritage in its area; Developing the skills capacity within the local authority to address adaptation/mitigation/emergency management issues affecting heritage assets in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works. (SD-C292-CAP-11)</li> <li>• HSE recommends an expanded Climate Change Risk Assessment is undertaken to assess risks other than those associated with severe weather, which tend to be acute and sudden onset in nature, and assess some of the more gradual, slow onset effects. This may include the effect on asthma rates during a longer growing season as well as gradual changes in infectious disease trends such as the threats posed by vectors such as rats, cockroaches and mosquitos for example. (SD-C292-CAP-30)</li> </ul>	<p>In the Draft CAP, Figure 3.7 provides a current climate risk matrix, based on the frequency of hazard and the associated level of impact already seen in South Dublin County. Figure 3.9 provides a risk matrix, showing the future changes in risk for the identified hazards in South Dublin County. These will also have a bearing on SDCC service provision.</p> <p>With regard to impacts and opportunities, the Draft Plan underwent a Strategic Environmental Assessment (SEA) and includes an Environmental Report. The Draft Plan also underwent Appropriate Assessment (AA) and includes a Natura Impact Report.</p> <p>In the Energy and Buildings section of the Draft CAP, Action E12 relates to developing the sensitive retrofit of historic / protected structures across South Dublin, with the aim of improving energy efficiency and building climate resilience. This action has been framed by the national Climate Adaptation Plan for the Built and Archaeological Sector, published in 2019.</p> <p>As part of the implementation of Draft CAP Action E12, it is proposed to undertake a climate change risk assessment relating to the built environment by way of on-going action, several condition assessment reports have been completed for SDCC owned Protected Structures. As an initial examination of structures, this has formed a scope of works and has resulted in a programme of</p>
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		<p>conservation works, including repairs and consolidation works to prevent any further deterioration.</p> <p>SDCC continue to protect and respond to any direct damage to Protected Structures in its ownership and use the appropriate planning legislation, when necessary, to ensure owners safeguard their structures, under their duty of care. Under the National Architectural Conservation Grant Schemes, conservation repairs are completed and financial support is provided to carry out works to include energy upgrades and other measures.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
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#### 4.6 Submissions on Section 4 Responding to Risks - Emergency Response Planning

Issue	Issue Summary	CE Response and Recommendation
Adaptation	<ul style="list-style-type: none"> <li>HSE recommends as an action area Flood Resilience seems too narrow when one views the range of existing and future hazards faced in South Dublin. Perhaps a phrase along the line of Disaster Risk Management would better capture the range of hazards from extreme weather to slow onsets events illustrated in Fig 1.2 on page 11. (SD-C292-CAP-30)</li> <li>HSE recommends a Rapid Response to the existing Climate and Biodiversity emergency. This rapid response should expand upon the existing Emergency Management Framework to include Prevention (after the hazard analysis and before</li> </ul>	<p><b>CE Response</b></p> <p>The Climate Change Risk Assessment for South Dublin County outlines the risks that a changing climate can pose to citizens, infrastructure, businesses, and service delivery. This highlights the need to prepare a response plan for major emergencies, including major emergencies relating to these extreme weather events.</p>

	<p>mitigation) and in Recovery to stress the importance of Building Back Better, Safer and Stronger. The Sendai Framework should be applied in Disaster Risk Management. There must be the requisite balance on each of the elements with particular attention paid to Prevention. The old mantra applies Prevention is Better than Cure. Prevention in relation to the risk of flooding for example goes beyond engineering or nature-based solutions but also includes building capacity in communities and reducing their vulnerability. Early Warning Systems for example should form part of this reduction in vulnerability. (SD-C292-CAP-30)</p>	<p>Section 4 of the Draft CAP relates to Responding to Risks – Emergency Response Planning. A Framework for Major Emergency Management (MEM) was adopted by Government decision in 2006. The Framework is based on the internationally recognised systems approach that, in essence, proposes an iterative cycle of continuous activity through five stages of emergency management: Hazard identification, Mitigation, Preparedness, Response and Recovery. South Dublin County Council (SDCC) is part of the Major Emergency East Region, comprising the counties of Dublin (including Dublin City, Dún Laoghaire-Rathdown and Fingal), Kildare and Wicklow.</p> <p>SDCC has a Major Emergency Plan, drafted under guidance from the relevant framework documents, to facilitate the response to, and recovery from, major emergencies, and to ensure coordination with the other two designated Principal Response Agencies.</p> <p>Action F1 of the Draft CAP states to review and update Major Emergency Management Response plans, SDCC policies or relevant Standard Operating Procedures (SOPs), with national Legislation and regulation on Climate Change adaptation and flood management, as required / annually.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
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#### 4.7 Submissions on Section 5 Energy & Buildings

Issue	Issue Summary	CE Response and Recommendation
Retrofitting of Buildings	<ul style="list-style-type: none"> <li>• Councillor Derren Ó Brádaigh states the SDCC should expedite the retrofitting programme to complete all Council owned buildings and houses. (SD-C292-CAP-10)</li> <li>• Not Here Not Anywhere (NHNA) states housing stock should be retrofitted rapidly. Energy has to be seen as a human right and should not be subject to price hikes for company profits. (SD-C292-CAP-15)</li> <li>• SDCC Green Party Councillors state SDCC should identify the number of social housing units and homes that will need to be retrofitted by 2030 to reach the emission reductions targets set out in the plan and specify the additional funding required to achieve these targets. Host 1-stop shop/pop up shops for business and private homeowners to learn about retrofitting options for their homes and businesses. Include an action to provide supports to private homeowners to retrofit. Include an action to support approved housing bodies to retrofit and decarbonise. Include an action to support older multi-unit developments to retrofit their buildings. Develop a strategy to retrofit all social housing stock and council owned properties by 2030. (SD-C292-CAP-22)</li> <li>• Thomas Weafer states that the CAP should set a target to have all SDCC social housing units retrofitted to a BER B2 standard by 2029. The additional funding required for this program should be drawn down from the “second avenue of access” referred to in the Infrastructure, Climate &amp; Nature Fund announced in Budget 2024. (SD-C292-CAP-8)</li> <li>• John O’Leary states further energy improvement to the Councils Housing stock e.g. Heat Pump and Solar PVs should be included. (SD-C292-CAP-8)</li> </ul>	<p><b>CE Response</b></p> <p>As outlined in the Energy and Buildings Section of the Draft Plan, improving energy efficiency and reducing carbon emissions in SDCC buildings, is one of the Council’s key action areas. A number of Actions are included relating to the energy performance of Council owned buildings and social housing.</p> <p>The Council has a Building Decarbonisation Strategy, to be implemented under the Climate Action Plan. The strategy sets out a pipeline of suitable energy efficiency and renewable energy projects for SDCC buildings, based on meeting 2030 targets. The most important buildings, with the greatest energy consumption, identified in the strategy pipeline consist of County Hall, County library, Civic Theatre, Clondalkin Civic Offices and Tallaght and Clondalkin leisure centres.</p> <p>The Strategy is iterative, and the pipeline of projects will continue to evolve depending on the status of buildings and the ‘Gap to Target’ analysis to 2030. These non-domestic projects will be delivered through the EU funded DeliverEE project, assisted by a project implementation unit established by Codema – Dublin’s Energy Agency. The Council and Codema are currently working to deliver building energy efficiency upgrades and</p>

	<ul style="list-style-type: none"> <li>• Four Districts Woodland Habitat Group (FDWHG) asked how can the Council actively lobby the Government to provide the funding to accelerate social housing retrofits in the first instance? (SD-C292-CAP-27)</li> <li>• Codie Preston states SDCC currently run a scheme where residents can apply for an upgrade to their heating boilers. A relation of mine recently benefited from the scheme and got a new oil-fired boiler. This relative was never given any information on heat pumps and did not know anything about them. This worthy scheme should give information and incentives for people to switch to heat pump technology. (SD-C292-CAP-29)</li> </ul>	<p>decarbonisation projects on a variety of SDCC owned non-domestic buildings over the next number of years.</p> <p>Action E10 of the Draft Plan relates to retrofitting of the Council's housing stock, prioritising energy efficiency upgrades in areas that have been identified in the Dublin Region Energy Masterplan as being energy poor.</p> <p>The Council continues to implement the Government's Energy Efficiency Retrofitting Programme for social housing upgrades. The programme has an overall target of 36,500 social houses nationally to be upgraded to a BER rating of B2. The revised programme provides significant upscaling in the levels of funding available in line with the Programme for Government commitments.</p> <p>No specific 2030 target has been confirmed for each individual Local Authority; however, based on SDCC having approximately 7% of the national social housing stock, it is expected a minimum target of 2,500 Energy Retrofit Upgrades to properties will be required, by 2030.</p> <p>To date, the Council has availed of maximum levels of funding under the programme, within the parameters of annual Government funding allocations made available to SDCC for social housing retrofits. The Council continues to undertake a programme of stock condition</p>
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		<p>surveys of the social housing stock, with the aim of increasing completion targets, subject to funding being made available by the Department of Housing, Local Government and Heritage.</p> <p>Under the ongoing Energy Efficiency Retrofit Programme, SDCC has upgraded a total of 244 social housing units and a further 185 are at tender stage. With regard to the Council funded windows and doors upgrade programme, 235 unit upgrades have been completed to date, with a further 266 at tender stage.</p> <p>With regard to supporting private homeowners in upgrading and retrofitting their homes, a 'One Stop Shop' service is currently coordinated by the Sustainable Energy Authority of Ireland (SEAI). The Council acknowledges the need for increased awareness by private residents, in the range of home energy upgrade options and funding available. It is considered that the provision of local pop-up awareness raising events could be included as a new action in the Draft Plan, in this regard.</p> <p>The Council's Housing Grants Section operates a grants scheme for private homeowners to undertake boiler replacements and heating upgrades. The grant recipients liaise directly with a service provider, regarding replacement technologies and advice on heating systems available.</p>
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		<p><b>CE Recommendation</b> The following new action to be included in the Community Engagement section of the Draft Plan:</p> <ul style="list-style-type: none"> <li>• <b>Engage with communities and residents across the County, through local pop-up awareness raising events, on home energy upgrades, funding and other supports available.</b></li> </ul>
<p>Buildings Usage</p>	<ul style="list-style-type: none"> <li>• MEP Ciarán Cuffe states that this CAP should include more initiatives surrounding Development Plans and the prioritisation of mixed-use developments. If offices and residential buildings were integrated, this would help to reduce the number of car commuters, thus reducing the carbon footprint of south Dublin citizens while also helping to decongest the city centre during rush hour. Another positive addition to this CAP would be the creation of biodiversity inclusive designs for social housing, to ensure that no one is left behind in the green transition. (SD-C292-CAP-21)</li> <li>• The Irish Green Building Council (IGBC) states actions are required to support a better use of the existing building stock. (SD-C292-CAP-3)</li> <li>• SDCC Green Party Councillors state the CAP should identify a list of SDCC owned vacant buildings and prepare reuse plans for each building Initiatives such as 'Living Above the Shop' would play a key role in regeneration. Strategies and policies to encourage the meanwhile use of buildings. (SD-C292-CAP-22)</li> <li>• Four Districts Woodland Habitat Group ask do the CAP projections / forecast include the proposed increase in commercial and residential properties outlined in the 2022-2026 County Development Plan? Are they accounted for? (SD-C292-CAP-27)</li> </ul>	<p><b>CE Response</b> The Government has set ambitious 'all of society' targets for a 50% improvement in energy efficiency and a 51% reduction in greenhouse gas (GHG) emissions by 2030, with net-zero emissions no later than 2050. To meet these targets requires ambitious reductions in greenhouse gas emissions and energy efficiency improvements in commercial, residential and public buildings.</p> <p>As outlined in the Energy and Buildings Section of the Draft Plan, improving energy efficiency and reducing carbon emissions in SDCC buildings, is one of the Council's key action areas. A number of Actions are included relating to the energy performance of Council owned buildings and social housing.</p> <p>The Council's Vacant Homes Section acts as central advisory point for property owners in terms of providing advice, assistance and information on the many schemes which are available to bring vacant properties back into use.</p>

	<ul style="list-style-type: none"> <li>• HSE state building standards should incorporate design measures to minimise the risks of buildings overheating. Shaded outdoor areas such as tree cover should also be incorporated into development planning to reduce the impacts of heatwaves. The value of residential gardens and avoidance of soil trapping should not be underestimated and should be considered in urban planning decisions. (SD-C292-CAP-19)</li> </ul>	<p>Under the National Vacant Housing Re-use Strategy, each local authority is required to identify the scale of vacant homes and develop plans to address vacancy within their administrative area, by categorising vacant homes by location, ownership, and reason for vacancy and subsequently to identify those properties that have the potential to be refurbished and made available for use.</p> <p>Phase 1 of a County-wide survey of potential vacant properties, in conjunction with the Department of Housing, Local Government and Heritage enabling the compilation of a more comprehensive list of vacant homes in the County, has taken place.</p> <p>There are several initiatives in place with the aim of encouraging and enabling privately owned vacant homes to be brought back into use, whether to the social housing or private rented market these include; Croí Cónaithe Vacant Homes Grant to support the refurbishment of vacant properties, Repair and Leasing Scheme, Buy and Renew Scheme, Ready to Build scheme, Urban Regeneration and Development Fund (URDF) which has been made available to acquire long term vacant or derelict properties for onward sale or re-use, Long- Term Leasing, Rental Accommodation Scheme (RAS) and Housing Assistance Payment (HAP).</p>
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		<p>The Council has a range of legislative powers available to deal with under-utilised and derelict properties including through Compulsory Purchase and Derelict Sites legislation, where necessary.</p> <p>With regard to reuse of SDCC owned vacant buildings, the Council continually reviews its own building stock and options for re-use and re-purposing of buildings.</p> <p>With regard to development across the County, (which includes mixed use developments), climate action is a core objective of the County Development Plan 2022-28. The promotion of a compact urban form of development is a central part of mitigating climate change. The range of policies and objectives of the CDP seek to provide for a consolidated urban form within existing settlements that are integrated with existing and planned public transport and the delivery of social and physical infrastructure.</p> <p>The County Development Plan also includes objectives for and fully supports the 10-minute city concept. Chapter 5 - Quality Design and Healthy Placemaking, sets out the approach to make this happen including the need for mixed use development, movement networks which support active travel and connectivity, the re-development of underutilised sites and regeneration areas. The Plan also includes policies on the location of employment intensive</p>
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		<p>development, in urban areas within the County with services and good transport networks.</p> <p>As detailed in the Draft Plan, the City Edge project (a partnership between SDCC and Dublin City Council), has a range of ambitious strategic objectives relating to climate action, including to follow compact growth principles.</p> <p>With regard to the impacts of the urban heat island affect, this is one of the Key Action Areas included in the Nature Based Solutions section of the Draft Plan (N14 – N16).</p> <p>A range of other plans, including, but not limited to, the Council's County Development Plan, Corporate Plan, Local Economic and Community Plan, Biodiversity Plan, also aim to support the Draft Climate Action Plan. Further policy, mainly the Green Infrastructure Strategy and the implementation of a 'Green Space Factor', drives the inclusion of nature-based solutions and Sustainable Urban Drainage systems in all new developments.</p> <p>With regard to biodiversity inclusive design for social housing, Action N10 of the Draft Plan relates to the piloting and co-design of a biodiversity inclusive design for a social housing estate. The Draft CAP includes a Baseline Emissions Profile, as required by the Local Authority Climate Action Plan Guidelines, published by the Department of the Environment, Climate and</p>
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		<p>Communications. This includes both an SDCC profile and a countywide profile, addressing a number of sectors. It is noted that the energy and climate profile of future growth and development in the County (including commercial and residential properties), can be included in future updates to this profile, based on available data. It should be noted that new builds across the County, will be designed and constructed to meet the current building regulations, in particular the Nearly Zero Energy Buildings (NZEB) standard.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>District Heating</p>	<ul style="list-style-type: none"> <li>• Councillor Eoin Ó Broin states given that SDCC are the current pioneers of District Heating in Ireland, one way this matter could be addressed is to conduct system level studies to investigate which would be cheaper - to roll out a district heating network to provide heat in social housing or on the other hand to retrofit the same social housing dwellings. (SD-C292-CAP-9)</li> <li>• Hannah Byrne states she supports the expansion of District Heating in the south Dublin area and believe this should be accelerated in suitable areas, and the Tallaght scheme should be expanded to provide for a greater percentage of buildings. (SD-C292-CAP-20)</li> <li>• MEP Ciarán Cuffe states that while I welcome the initiative to introduce district heating for residential buildings, more ambition would be welcomed here, and plans to use district heating to heat public buildings too. (SD-C292-CAP-21)</li> <li>• People Before Profit state considering the large number of data centres in Grange Castle there is potential here for a significant district heating system. This needs to be planned with the</li> </ul>	<p><b>CE Response</b> As outlined in the Energy and Buildings Section of the Draft Plan, alternative energy sources, is one of the Council's key action areas. A number of Actions are included relating to district heating.</p> <p>SDCC, working with Codema, have successfully delivered Phase 1 of the Tallaght District Heating scheme, with plans to expand being further developed. The Tallaght scheme will initially provide heat to public buildings, including County Hall, Tallaght County Library, the SDCC Innovation Centre and 133 affordable apartments, which will be connected in early 2025. Technological University Dublin - Tallaght buildings, are scheduled to be completed in 2024.</p>

	<p>utmost urgency to allow the new homes in the Clonburris SDZ to avail of this system. It would make sense to put the plans for this in place before the construction of houses here, or at least to ensure through the planning system that homes will be ready for district heating when it is developed. (SD-C292-CAP-17)</p>	<p>District Heating (DH) and retrofitting are not mutually exclusive actions and, in many ways, can complement each other. For example, a heating system in a dwelling that operates at lower temperatures will also improve the efficiency of the DH network if connected to it, and switching a building to using a low-carbon heat source like DH will improve its BER rating. The Council will continue to consider these matters, in collaboration with Codema – Dublin's Energy Agency. The retrofitting of existing social housing stock is also addressed elsewhere in this report.</p> <p>Action E17 of the Draft CAP relates to developing proposals for further district heating schemes, including at Clonburris and Grange Castle.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Data Centres</p>	<ul style="list-style-type: none"> <li>• John O'Leary states that Council should lead with harnessing further power from our many Data Centres in the County, generating power for Council/Community/Library buildings, Street lighting, District Heating etc. (SD-C292-CAP-28)</li> <li>• John O'Leary states SDCC Planning Department to add a requirement that all new Data Centre buildings be self-sufficient in terms of their own Renewable power. (SD-C292-CAP-28)</li> <li>• Councillor Derren Ó Brádaigh states he would like SDCC to conduct a feasibility study with the many existing data centre providers in Dublin West, to explore expansion of the current district heating scheme in Tallaght to large population growth areas such as Clondalkin, Saggart, Rathcoole, Newcastle, Lucan and Adamstown. (SD-C292-CAP-10)</li> </ul>	<p><b>CE Response</b> As outlined in the Energy and Buildings of the Draft Plan, alternative energy sources, is one of the Council's key action areas. A number of Actions are included relating to district heating, which includes the role of data centres, including at Tallaght, Clonburris and Grange Castle. The Council will consider the expansion of such schemes, where viable.</p> <p>The County Development Plan 2022-28 includes policy objectives in relation to space extensive land uses (which includes data centres), including</p>

	<ul style="list-style-type: none"> <li>• Four Districts Woodland Habitat Group states how can the Council include actions that “maximise renewable generation” such as retrofitting of existing Data Centres, and other high area commercial premises e.g., AMAZON distribution centre with solar panelling, heat capture, etc.? Actions are needed specific to Data Centres. (SD-C292-CAP-27).</li> <li>• Not Here Not Anywhere states that the Climate Action Plan should add as an action the setting of an overall cap on the level of data centre energy demand that can be accommodated by the electricity grid in the county. The Climate Action Plan should specify that new and existing data centres are required to provide flexibility to the grid at times of day and times of year when wind and solar energy on the grid is low relative to demand - and not allowing data centres to use fossil fuel generation as the means of providing this flexibility (they can use other means e.g. energy storage, time-shifting of data processing services). The Climate Action Plan should specify that new data centres are required to be powered entirely by one of the following, and existing centres should be required to transition rapidly to: On site direct renewable power source generation combined with energy storage, or Off site renewable power source and energy storage with dedicated grid connection (avoiding Renewable Energy Certificates). Any renewable energy infrastructure must comply with best practice public participation. New data centres should have infrastructure in place to enable heat generated from them to be utilised for district heating systems. (SD-C292-CAP-15)</li> <li>• People Before Profit state that they are very concerned to see that data centres are now responsible for 32% of all carbon emissions in the county. We want to re-iterate our call for a complete ban on any new data centres in the county. (SD-C292-CAP-17)</li> </ul>	<p>criteria against which a planning application for such uses is assessed. This includes criteria for renewable energy and the need for measures to facilitate heat networks, where excess heat is generated.</p> <p>The Ministerial Direction in relation to the adoption of the County Development Plan 2022-28, states that the Council cannot completely preclude data centre developments, which would be contrary to national policy.</p> <p>Under the EU Energy Efficiency Directive 2023, data centres (of 500kW or more) will be required (from 2024 onwards) to publish data relating to energy efficiency of data centre operations. This includes floor area, installed power, data volumes, energy consumption, power usage effectiveness (PUE), temperature set points, waste heat utilisation, water usage, and use of renewable energy. The requirements are set out in Annex VII of the Directive.</p> <p>The capacity or otherwise of the electricity grid is within the direct remit of Eirgrid and the Commission for Regulation of Utilities and it is not within the remit of the Council to set caps in this regard. It is the role of Eirgrid to engage with large energy users on energy demand and measures to reduce it, in times of capacity constraint matters.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
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	<ul style="list-style-type: none"> <li>• HSE state that all planning considerations for future data centres should examine their net impacts on emissions and be contextualised in terms of the emissions targets for South Dublin before planning is granted. There should also be a requirement for existing data centres to become fully operational using only renewable energy sources. (SD-C292-CAP-19)</li> </ul>	
Renewables	<ul style="list-style-type: none"> <li>• John O'Leary states we would like to see our Council lead with Wind and Solar farms in the County, generating power for Council/Community buildings and street lighting etc. (SD-C292-CAP-28)</li> <li>• Eoin Brophy states that CGRA (Corkagh Grange Residents Association) note the rather conspicuous absence of solar panels from the roof of most publicly owned buildings. New Perovskite crystal based solar panels will soon be commercially available. (SD-C292-CAP-9)</li> <li>• Not Here Not Anywhere states the Climate Action Plan should include actions which incentivise community energy projects - community based projects, organisations and social enterprises involved in the energy sector, owned and operated by local people and local authorities in the community. (SD-C292-CAP-15)</li> </ul>	<p><b>CE Response</b></p> <p>As outlined in the Energy and Buildings section of the Draft Plan, alternative energy sources and increase SDCC's renewable energy generation capacity, is one of the Council's key action areas. A number of Actions are included in the Draft CAP E14 – E20, in this regard.</p> <p>The Council has a Building Decarbonisation Strategy, to be implemented under the Climate Action Plan. The strategy sets out a pipeline of suitable energy efficiency and renewable energy projects for SDCC buildings, based on meeting 2030 targets. The most important buildings, with the greatest energy consumption, identified in the strategy pipeline consist of County Hall, County library, Civic Theatre, Clondalkin Civic Offices and Tallaght and Clondalkin leisure centres.</p> <p>The Strategy is iterative and the pipeline of projects will continue to evolve depending on the current status of buildings and the 'Gap to Target' analysis to 2030. These non-domestic projects will be delivered through the EU funded DeliveREE project, assisted by a project implementation unit established by Codema – Dublin's Energy Agency.</p>

		<p>The Council and Codema are currently working to deliver building energy efficiency upgrades and decarbonisation projects on a variety of SDCC owned non-domestic buildings over the next number of years.</p> <p>Furthermore, the Register of Opportunities for Clondalkin Decarbonising Zone, includes the upgrade of social housing stock for energy efficiency and renewable heat systems, support development of group or neighbourhood approaches for residential retrofit, renewable heating, and solar installation.</p> <p>The Wind Strategy for South Dublin County is set out in the County Development Plan 2022-2028. It was prepared under Section 28 of the Planning and Development Act 2000) (as amended), Wind Energy Development Guidelines. The County is not identified as suitable for large scale wind farms, with minor exceptions. It is expected that the County's Wind Strategy will be reviewed in 2024. Policy objectives for other renewable energy development proposals, including solar energy, are included in the County Development Plan.</p> <p>With regard to community energy projects, the Council launched the Community Climate Action Programme on 13<sup>th</sup> December 2023. Funding of €1.073m is available for local, not-for-profit community groups and organisations over an</p>
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		<p>initial 18-month period to undertake local climate action projects.</p> <p>The overall objective of the Programme is to support and empower communities, in partnership with SDCC, to deliver projects that shape and build low carbon, sustainable communities in a considered and structured way, to help contribute to national climate and energy targets.</p> <p>Communities can play a crucial role in driving such positive change. In conjunction with the Department of the Environment, Climate and Communications, SDCC will support this through the Climate Action Plan. Project sizes include small (up to €20,000), medium (€20,000 - €50,000) and large (€51,000 - €100,000).</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Housing</p>	<ul style="list-style-type: none"> <li>• HSE state there is a need to build an adequate supply of climate resilient, zero-carbon housing, in line with projected population increases and housing demand increases. Development planning in the context of climate change should consider the needs of the most vulnerable populations in the county, such as people experiencing homelessness or those experiencing deprivation. (SD-C292-CAP-19)</li> <li>• People Before Profit state the social housing stock owned by SDCC should be included in the calculations for the SDCC emissions. It's completely unrealistic to expect tenants to make the necessary improvements to their homes. (SD-C292-CAP-17)</li> </ul>	<p><b>CE Response</b> The Government has set ambitious 'all of society' targets for a 50% improvement in energy efficiency and a 51% reduction in greenhouse gas (GHG) emissions by 2030, with net-zero emissions no later than 2050. To meet these targets requires ambitious reductions in greenhouse gas emissions and energy efficiency improvements in commercial, residential and public buildings.</p>

		<p>The Council continues to deliver new housing units across the County, in line with its Housing Delivery Action Plan 2022-2026. It should be noted that all new builds across the County, will be designed and constructed to meet the current building regulations, in particular the Nearly Zero Energy Buildings (NZE) standard. A range of residential design policies, objectives and design standards are also included in the County Development Plan 2022-28.</p> <p>With regard to improvements to social housing stock, the Council continues to implement the Government's Energy Efficiency Retrofitting Programme for social housing upgrades. The programme has an overall target of 36,500 social houses nationally to be upgraded to a BER rating of B2. The revised programme provides significant upscaling in the levels of funding available in line with the Programme for Government commitments.</p> <p>No specific 2030 target has been confirmed for each individual Local Authority; however, based on SDCC having approximately 7% of the national social housing stock, it is expected a minimum target of 2,500 Energy Retrofit Upgrades to properties will be required, by 2030.</p> <p>To date, the Council has availed of maximum levels of funding under the programme, within the parameters of annual Government funding allocations made available to SDCC for social</p>
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		<p>housing retrofits. The Council continues to undertake a programme of stock condition surveys of the social housing stock, with the aim of increasing completion targets, subject to funding being made available by the Department of Housing, Local Government and Heritage.</p> <p>Public bodies, including local authorities, must report their energy performance annually using the Monitoring and Reporting (M&amp;R) system. This results from the transposition into Irish law of the EU Energy Efficiency Directive 2012. The M&amp;R system is administered by the Sustainable Energy Authority of Ireland (SEAI). Currently, social housing stock is not included in local authority reporting calculations, as it is not included in the Directive requirements.</p> <p>However, the Council continues to upgrade social housing stock across the county, funded from the Council's budget and funding from the Department of Housing, Local Government and Heritage. Furthermore, all new Council housing stock is built to the Nearly Zero Energy Building (nZEB) standard. In delivering its housing programme of works, the Council continues to facilitate a Just Transition to climate change across the County, which reflects the national climate objective, as outlined in the national Climate Action Plan.</p> <p>Under the ongoing Energy Efficiency Retrofit Programme, SDCC has upgraded a total of 244</p>
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		<p>social housing units and a further 185 are at tender stage. With regard to the Council funded windows and doors upgrade programme, 235 unit upgrades have been completed to date, with a further 266 at tender stage.</p> <p>Action E10 of the Draft Plan relates to retrofitting of the Council's housing stock, prioritising energy efficiency upgrades in areas that have been identified in the Dublin Region Energy Masterplan as being energy poor.</p> <p>The Council's Homeless Service Unit continues to provide a range of services to those who are homeless, rough sleeping or at risk of homelessness, in the County.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Public Lighting</p>	<ul style="list-style-type: none"> <li>• SDCC Green Party Councillors states the CAP should consider public lighting and the transition to LED's while taking into consideration their impacts on city flora and fauna. (SD-C292-CAP-22)</li> <li>• Christopher Conway states the public lighting alongside this pathway [cycle path between the Bawnogue shopping centre, and the boundary of the R113], should be wildlife friendly as Bats and Hedgehog have been observed alongside it and the hedgerow. The recommended one Metre grass nettle area each side of a hedgerow that should Not be cut, this rule should be strictly adhered to</li> </ul>	<p><b>CE Response</b> Public lighting is SDCC's highest energy consumer, accounting for more than half of the Council's overall primary energy consumption at 51%. As public lighting upgrades are essential to SDCC achieving its energy efficiency target, the Council is committed to achieving further energy reductions in this area.</p> <p>Proposed projects and programmes likely to have an impact on protected species require habitat / species surveys and assessment, as standard.</p>

	<p>whenever grass-cutting is being carried out by SDCC or its agents. (SD-C292-CAP-31)</p>	<p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Fossil Fuels</p>	<ul style="list-style-type: none"> <li>• Not Here Not Anywhere state the Climate Action Plan should ensure a rapid phasing out of all fossil fuels including gas. The Climate Action Plan should include a planned phasing out of existing connections to the gas grid. The Climate Action Plan should ban fracked gas in its energy mix. The Climate Action Plan should rule out any new fossil fuel infrastructure projects. (SD-C292-CAP-15)</li> </ul>	<p><b>CE Response</b> The phasing out of all fossil fuels, including gas, is a national issue and within the Government's remit, having regard to the implementation of the Climate Action and Low Carbon Development (Amendment) Act 2021, the national Climate Action Plan and a range of other Government and EU legislation and policies.</p> <p>The banning of fracked gas and ruling out any new fossil fuel infrastructure projects are matters for national Government and are beyond the scope of the Draft Plan.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Construction &amp; Demolition Waste</p>	<ul style="list-style-type: none"> <li>• Irish Green Building Council state introducing financial incentives to support reuse and low carbon developments. This may include increasing levies on vacant properties, applying an additional planning levy (or increased rates) to new construction where major demolition is involved, or reducing planning levies for buildings of low carbon intensity. Better supporting re-use of construction materials. E.g., through the development of storage facilities for large quantities of high-quality construction materials for reuse (materials exchange). Requesting pre-demolition assessments, presenting the environmental and economic case for repair or replacement. In cases where demolition is an appropriate course of action, request waste audits conducted by external auditors ahead of demolition to</li> </ul>	<p><b>CE Response</b> The role of the local authority in levies is in accordance with rates set by national Government, under the Vacant Site Levy and / or the Derelict Sites Act and the Residential Zoned Land Tax.</p> <p>The Development Contribution Scheme (DCS), adopted by the Elected Members of the Council, does not currently facilitate reduced rates for buildings of low carbon intensity. The DCS will be reviewed in 2024 and will be subject to public consultation.</p>

	<p>further support the mitigation of Construction &amp; Development Waste (CDW). (SD-C292-CAP-3)</p>	<p>With regard to the Council's own operations, Action R3 in the Draft Plan relates to identifying opportunities to reduce Construction and Demolition (C&amp;D) waste generated by SDCC and liaise with relevant organisations collaboratively.</p> <p>With regard to other sectors, it is noted that the Environmental Protection Agency (EPA) has published 'Best practice guidelines for the preparation of resource &amp; waste management plans for construction &amp; demolition projects'. The purpose of the guidelines is to provide a practical approach which is informed by best practice in the prevention and management of C&amp;D wastes and resources from design through to construction and deconstruction.</p> <p>Construction &amp; Demolition Waste is also addressed in the National Waste Management Plan for a Circular Economy.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
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#### 4.8 Submissions on Section 5 Transport

Issue	Issue Summary	CE Response and Recommendation
Active Travel Projects	<ul style="list-style-type: none"> <li>John O'Leary states the need to continue to progress Green Transport e.g. Safe routes for Walking/Cycling/Elec Scooter, Public Transport and electric charge points. (SD-C292-CAP-7)</li> </ul>	<p><b>CE Response</b> As outlined in the Transport Section of the Draft Plan, promoting Active Travel is one of the Council's key action areas to address transport related emissions across the County.</p>

	<ul style="list-style-type: none"> <li>• Hannah Byrne states the need for the pedestrianisation of certain parts of Lucan village and improving active travel routes into the village is supported. (SD-C292-CAP-20)</li> <li>• HSE submission states that Active Travel networks should also be considered and implemented in the planning of all new public amenities or housing developments. (SD-C292-CAP-19)</li> <li>• Dublin Cycling Campaign submission states that whilst the Active Travel actions include measures to track progress, they do not include targets. The actions, targets and measures should be publicly available on SDCC websites. (SD-C292-CAP-14)</li> <li>• Codie Preston states that SDCC should cost and consider gifting a bicycle to every child in the county at a certain stage of their schooling i.e. once a student enters 6th class, they are gifted a bike or voucher to buy a bike. Adults benefit from the bike to work scheme, there should be a similar scheme for children. (SD-C292-CAP-29)</li> <li>• With regard to Action T11, Dublin Cycling Campaign submission states that Safe Routes to School Programme, only a small number of schools in South Dublin have benefited from the Safe Routes to School programme so far. This programme needs to be accelerated to give children who live within 1 to 2 kilometres of their school, the opportunity to safely cycle or walk to school. (SD-C292-CAP-14)</li> <li>• SDCC Green Party Councillors submissions states to develop secondary school programme to support and incentivise cycling to school. Include a Safe Schools target that all schools in SDCC be made accessible and safe for children walking to school by 2030. Create an online map of the safe cycle and walk to school routes in SDCC to encourage active travel. (SD-C292-CAP-22)</li> <li>• Woodview Heights Resident's Association state the need for active travel to support children to access Scoil Mhuire &amp; Lucan United Football club located in our estate need review and the</li> </ul>	<p>The range of Active Travel actions contained in the Draft Plan will progress opportunities to make walking and cycling more attractive and viable and target reasons that people choose not to cycle, with the goal of making the County one of Ireland's most cycle friendly counties.</p> <p>The Active Travel actions contained in the Draft Plan, will also provide people of all ages and abilities with a well-connected, well designed and safe cycle network, that offers citizens a credible alternative to using the private car.</p> <p>The Cycle South Dublin Programme commenced in 2021, with significant progress made on a range of projects. The identification of additional schemes will be undertaken in collaboration with the National Transport Authority and other stakeholders, as relevant.</p> <p>The Council maintains an Active Travel website, <a href="https://www.sdcc.ie/en/active-travel/">https://www.sdcc.ie/en/active-travel/</a> which is updated regularly, to keep the public informed on project updates. This includes an interactive map of current and proposed projects across the County.</p> <p>The Council's Active Travel team will continue to liaise with internal and external stakeholders as projects are developed, to ensure the enhancement and safety of the public realm. The monitoring of Active Travel projects is undertaken in accordance with the guidelines as set out by the</p>
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	<p>residents' association are willing to assist in this process. (SD-C292-CAP-26)</p> <ul style="list-style-type: none"> <li>• Patrick Kinsella submission states the need for more safe cycle lanes to enable more cyclists. (SD-C292-CAP-2)</li> <li>• Future Of Dublin submission states the need for a segregated cycle track from Templeogue College to Templeogue Village in the near-term. (SD-C292-CAP-1)</li> <li>• Councillor Derren Ó Brádaigh submission states the need to construct the proposed Phase 2 of the Lucan Cycle Loop project via Vesey Park, Ardeevin/Tandy's Lane to Lucan Demesne, in line with SDCC Active Travel promotion and the Cycle South Dublin Programme. (SD-C292-CAP-10)</li> <li>• HSE submission suggests that progress on increasing the cycle network not only be measured in the number of linear metres added but also in connectivity to existing infrastructure, and number of kilometres that are fully segregated. (SD-C292-CAP-19)</li> <li>• Codie Preston states that they bring their son by bike to Creche in Tallaght village each day. The route is only partially served by cycle paths with the following sections forcing cyclists onto the very tight traffic:             <ul style="list-style-type: none"> <li>- Tymon park to Astro Park Tallaght</li> <li>- entrance to Bancroft Park - junction Main Street</li> </ul>             On the return leg there are no protected cycle paths from:             <ul style="list-style-type: none"> <li>- Junction Main Street to Bancroft Park</li> <li>- Harvey Norman to Mayberry Road (bend at this location). (SD-C292-CAP-29)</li> </ul> </li> <li>• Codie Preston states that Tallaght Village is dominated by cars. On most of Main Street, there are effectively 3 lanes (Two for traffic and one for car parking). At least one of these lanes should be used for active travel. It would require creating a one way traffic system for cars (this could be easily achieved as there</li> </ul>	<p>National Transport Authority, ensuring consistency at a national scale.</p> <p>In partnership with Fingal County Council, SDCC is currently undertaking a Feasibility Study for the Grand Canal to Royal Canal route, via Lucan. An Options Report for Phase 2 of the Lucan Cycle Loop project will be advanced in early 2024.</p> <p>With regard to Templeogue village, a segregated cycle track has partially been delivered, along the Templeville Road. A follow-on Phase 2 project is planned for 2024.</p> <p>With regard to Tallaght, a number of routes are being developed as part of the Cycle South Dublin and Bus Connects programmes. The Greenhills Road forms part of a spine Bus Connects route, which will also deliver active travel infrastructure. It is anticipated that works will be carried out on Airton Road as part of the CYSD project, works at the junction of Greenhills Road and Airton (close to Harvey Norman) will be considered under that project. The Council's Active Travel team have commenced work on proposals for a project through Bancroft Park.</p> <p>Action T11 relates specifically to the Safe Routes to Schools Programme (SRTS) and the implementation of the School Streets initiative. The development and expansion of these schemes is within the direct remit of An Taisce and the National Transport Authority.</p>
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	<p>are suitable detours available), or even better still, full pedestrianisation of the public space. (SD-C292-CAP-29)</p> <ul style="list-style-type: none"> <li>• Codie Preston states that this summer has shown that Climate Change is having a devastating effect across the world. Business as usual is not an option and active travel is one key part of the solution. To get people onto bikes and walking we must create the infrastructure for them to do so safely. Tallaght Village is currently way behind and an urgent response to this is needed by SDCC. (SD-C292-CAP-29)</li> </ul>	<p>It is noted that Scoil Mhuire has submitted an application under the SRTS programme. The Active Travel team will liaise with the school, on the basis of this application.</p> <p>With regard to development proposals across the County, climate action is a core policy objective of the County Development Plan (CDP) 2022-28. The promotion of a compact urban form of development is a central part of mitigating climate change. The range of policies and objectives of the CDP, seek to provide a consolidated urban form within existing settlements, that are integrated with existing and planned public transport and the delivery of social and physical infrastructure. It is an aim of the CDP to strive towards the delivery of connected neighbourhoods and the 10-minute settlement concept. This would provide for community facilities and services that are accessible within a 10-minute walk or cycle from home or accessible via public transport services, connecting people to larger scaled settlements, where such services are available.</p> <p>Modal share targets for the County, are included in the County Development Plan 2022-28 and are consistent with the NTA's Transport Strategy for the Greater Dublin Area (2016-2035).</p> <p>Climate targets for the transport sector are set at a national level, as required by the Climate Action and Low Carbon Development (Amendment) Act 2021. The national Climate Action Plan sets out</p>
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		<p>that the ambitious target for the transport sector to reduce emissions by 50% by 2030. The actions included in the national Climate Action Plan reflect an 'all of society' approach to addressing climate action.</p> <p>With regard to providing bikes to school children across the County, SDCC are working to progress opportunities to make cycling more attractive and targeting common reasons that people chose not to cycle. The Bike Hub project, which was delivered with stakeholders including Active South Dublin and Cycling Ireland, aims to promote South Dublin as one of Ireland's most cycle friendly counties.</p> <p>Located on the grounds of Collinstown Park Community College, the Bike Hub will look to provide a centralised base to engage the local community in cycling, providing training and repair facilities. Other elements such as a bike loan/rental scheme are also being considered.</p> <p>The Council's Active Travel team, in collaboration with the NTA and Sustainable Cities UCD, has been successful in securing a Bike Library for two large primary schools on Rossmore Road, Templeogue: Bishop Galvin, and Bishop Shanahan. Both schools are part of the Safe Routes to School programme and have almost 800 pupils. The Bike Library, which was officially launched in October 2023, is aimed to encourage parents with their children to cycle to school safely, whilst having the benefits of</p>
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		<p>reducing car congestion and creating a safe, healthier environment for everyone.</p> <p>A Bike Library gives families the opportunity to borrow either an e-bike, cargo bike or foldable bike for a set period during the school term at no charge, with a view to parents transitioning to the Bike Library from their cars.</p> <p>Action T13 of the Draft Plan relates to ensuring active travel schemes and initiatives make walking, and cycling more accessible for all users, including those with reduced mobility, disabilities and the elderly, to further opportunities for increasing a sustainable modal shift. For example, Cycling Without Age, highlights the commitment to provide people of all ages and abilities with a well-connected, well designed, and safe cycle network with bicycle parking.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Engagement on Active Travel</p>	<ul style="list-style-type: none"> <li>• SDCC Green Party Councillors request the delivery of cycle training programmes for under-represented groups. (SD-C292-CAP-22)</li> <li>• Dublin Cycling Campaign submission states that schemes like Cycling Without Age are fantastic to see and the continued delivery of schemes will ensure all in our community have the opportunity to cycle. It would be important that all existing barriers such as kissing gates are reviewed and where necessary removed to allow full access. Consideration of accessibility to cycling should also be given to those in lower socio-economic</li> </ul>	<p><b>CE Response</b></p> <p>As outlined in the Transport Section of the Draft Plan, promoting Active Travel is one of the Council's key action areas to address transport related emissions across the County.</p> <p>The range of Active Travel actions contained in the Draft Plan will progress opportunities to make walking and cycling more attractive and viable and target reasons that people choose not to cycle,</p>

	<p>groups where cycling is financially a more favourable option. Schemes like the Community Bike Hub should be expanded to offer cycles and training to those who may benefit. (SD-C292-CAP-14)</p> <ul style="list-style-type: none"> <li>• SDCC Green Party Councillors state the need to reduce barriers for car sharing by developing a range of incentives. (SD-C292-CAP-22)</li> </ul>	<p>with the goal of making the County one of Ireland's most cycle friendly counties. In conjunction with the implementation of active travel projects, public engagement initiatives, awareness and education campaigns will also have an important role to play.</p> <p>The Draft Plan contains a number of Actions in relation to this issue, including T5, T12, T13, T15. This includes the Council's Active Travel website, <a href="https://www.sdcc.ie/en/active-travel/">https://www.sdcc.ie/en/active-travel/</a> which is updated regularly, to keep the public informed on project updates.</p> <p>The Council also propose to run a series of Active Travel Roadshows across the County in 2024, to promote the benefits of Active Travel. The provision of cycle training can be considered further in this regard.</p> <p>The County's first Community Bike Hub was launched in 2022 in north Clondalkin. The expansion of the scheme would need to be considered in partnership with the relevant external stakeholders involved.</p> <p>With regard to removing physical barriers to cycling, including kissing gates, it has unfortunately been necessary at times, to control access to some parks, in order to prevent entry by scrambler motorbikes, quad bikes and stolen cars.</p>
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		<p>The installation of kissing gates at some entrances to parks and open spaces, is regarded as a temporary measure, which it is hoped can be relaxed and removed, going forward.</p> <p>In this regard, a recent amendment to the Road Traffic Acts 1961 to 2020, gives the necessary powers to the Gardai to seize scramblers from persons who are using them illegally. This should bring about the much-needed change in this area, which will ultimately result in the removal of scrambler use from public parks.</p> <p>The Council, in collaboration with the National Transport Authority and others, will seek to review and remove these barriers on a case-by-case basis, with a view to protecting the amenity of parks and Council assets, as part of wider work programmes, including SDCC's Public Realm Improvement Works Programme.</p> <p>With regard to car sharing initiatives, this is addressed by Action T14 of the Draft Plan, by way of engaging with car sharing scheme operators to increase the number of shared vehicles available in the County, with a focus on the provision of electric vehicles.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
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<p>Public Transport</p>	<ul style="list-style-type: none"> <li>• Woodview Heights Residents Association submission states that bus frequency and rail frequency are insufficient to meet the needs of Woodview Heights area and resident's concerns in relation to this deficiency have not been adequately listened to resulting in continued car use when this could be avoided. (SD-C292-CAP-26)</li> <li>• Future of Dublin submission requests that the NTA and private operators provide restoration of Aircoach route from Ballinteer/Terenure to Dublin Airport + exploration of further routes via M50. (SD-C292-CAP-1)</li> <li>• Future of Dublin submission requests that NTA for the addition of a new orbital S5 bus route along the R112 to be added to New Dublin Bus Area Network as part of BusConnects. New radial routes on public transport blackspots such as R817: Wainsfort Road (still due to have no bus service after BusConnects implementation). Work with landowners for the establishment of more Park &amp; Ride zones at sites such as Spawell, Templeogue. (SD-C292-CAP-1)</li> <li>• SDCC Green Party Councillors request the investigation of local town buses, linking transport hubs with residential areas. (SD-C292-CAP-22)</li> <li>• Councillor Derren Ó Brádaigh states that rail capacity and frequency need to be reviewed in tandem with developments to deter car dependence. Transition all trains to battery / biofuel as a matter of priority. (SD-C292-CAP-10)</li> <li>• HSE submission requests the introduction of restrictions to private transport in urban centres, and concurrent development of bus networks and park-and-ride options. (SD-C292-CAP-19)</li> </ul>	<p><b>CE Response</b></p> <p>As outlined in the Transport Section of the Draft Plan, Public Transport in South Dublin, is one of the Council's key action areas to address transport related emissions across the County.</p> <p>The Draft Plan includes specific actions regarding Public Transport provision. The Council will continue to work with the relevant transportation bodies, including the National Transport Authority, Transport Infrastructure Ireland and others, to facilitate and support the delivery of improvements to the public transport network, to achieve a modal shift across the County. Such projects include Bus Connects, DART+, LUAS capacity, transport hubs and new and enhanced rail stations.</p> <p>The provision of local bus services, increased rail frequency, local park and rides and the transition of fuels to biofuels, is beyond the scope of the Draft Plan and are primarily issues for bodies such as the National Transport Authority, Irish Rail and others.</p> <p><b>CE Recommendation</b></p> <p>No Change to the Draft Plan.</p>
<p>Electric Vehicles</p>	<ul style="list-style-type: none"> <li>• SDCC Green Party Councillors state the need for public EVs and EV charging units, as required in the city to reach targets. (SD-C292-CAP-22)</li> </ul>	<p><b>CE Response</b></p> <p>As outlined in the Transport Section of the Draft Plan, Electric Vehicle Charging, is one of the</p>

	<ul style="list-style-type: none"> <li>• SDCC Green Party Councillors state the need to Identify a specific policy that will allow the installation of private EV charging points and the provision of a guide for homeowners. (SD-C292-CAP-22)</li> <li>• SDCC Green Party Councillors request the need to implement an EV charging strategy 2022-2030. (SD-C292-CAP-22)</li> <li>• Councillor Derren Ó Brádaigh states the need to introduce EV charging points at all Council-owned building car parks. Clondalkin Civic Offices currently have 'zero' EV charging points. Introduce a minimum of 20% EV charging points here and at all Council-owned buildings in line with legislation and the European Union (Energy Performance of Buildings) Regulations 2021 in respect of multi-unit buildings that are new or undergoing planned renovations (where the renovations concerned include the car park or electrical infrastructure of the car park). Immediately set about introducing EV ducting infrastructure for all car parking spaces at Council-owned buildings. (SD-C292-CAP-10)</li> <li>• Councillor Derren Ó Brádaigh state that clear developer guidelines in the planning permission process should be in place to address new resident queries/concerns in relation to introducing EV infrastructure, and any subsequent issues that could arise in terms of responsibility after the taking-in-charge by the local authority. (SD-C292-CAP-10)</li> <li>• Eoghan Brophy states that publicly owned housing estates don't tend to have EV charging points. Interdepartmental coordination toward this end would be greatly appreciated. (SD-C292-CAP-9)</li> </ul>	<p>Council's key action areas to address transport related emissions across the County. There are a number of Actions included in the Draft Plan relating to electric vehicle charging.</p> <p>The Dubin Region represents approximately 25% of Ireland's car fleet and has a significant role to play in the decarbonisation of the country's transport system. SDCC, in collaboration with the other three Dublin local authorities, have developed the Dublin Local Authority Electric Vehicle Charging Strategy 2022-2030, to support the transition to electric vehicles. It sets out the Dublin local authorities' role in facilitating a coordinated approach to the deployment of EV charging infrastructure. The Dublin local authorities continue to engage with Zero Emissions Vehicles Ireland (ZEVl), on implementing the strategy.</p> <p>On behalf of the four Dublin local authorities, Codema – Dublin's Energy Agency is currently undertaking a Public EV Charging Services Tender, which includes proposed sites at Council-owned car parks.</p> <p>The Council's fleet is made up of approximately 250 vehicles, which are predominately internal combustion engine (ICE) vehicles and which accounted for 9.1% of the Council's total emissions in 2021. The Council has developed a Fleet Transition Strategy, which includes five-year and ten-year targets to decarbonise the fleet and</p>
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		<p>ensure the 2030 emission targets are met. The Council aims to ensure that all new vehicles purchased or replaced in the fleet are EVs charged from renewable sources or powered by renewable fuels.</p> <p>With regard to development proposals, electric vehicle policies, objectives and standards are included in the County Development Plan 2022-28.</p> <p>Regarding EV guidelines for homeowners and developers, Action T23 of the Draft Plan relates to privately owned EV charge points and the development of SDCC Policy and Standards Guidance for the installation of electric vehicle charge points in the public realm.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Junctions and Crossings</p>	<ul style="list-style-type: none"> <li>• Dublin Cycling Campaign state that in addition to allocating road space, time is also allocated to active travel. This could be achieved by adding an action to improve the priority given to pedestrians, cyclists and public transport at traffic signals. With regard to Action T15, proposals for reduced traffic movements are welcomed but in addition, inclusion of filtered permeability to ensure that active travel options are not curtailed but indeed offered and incentivised to those who opt for greener modes of transport, are sought. Similarly at crossings and junctions the movements of those walking or cycling should be prioritised over motor vehicular traffic. Innovative solutions should as weather varying sensors are utilised in the Netherlands, i.e. when precipitation occurs signals for cycling and walking are given</li> </ul>	<p><b>CE Response</b> As outlined in the Transport Section of the Draft Plan, promoting Active Travel is one of the Council's key action areas to address transport related emissions across the County.</p> <p>The range of Active Travel actions contained in the Draft Plan will progress opportunities to make walking and cycling more attractive and viable and target reasons that people choose not to cycle, with the goal of making the County one of Ireland's most cycle friendly counties.</p>

	<p>increased priority to reduce journey times rather than those who sit in the dry comfort of their vehicles. This should be utilised in SDCC given the increased precipitation values and the objectives to obtain a modal shift. (SD-C292-CAP-14)</p>	<p>With regard to junction improvements and traffic movements, as part of Active Travel projects, the Council aims to ensure that the appropriate level of time and priority is given to cyclists and pedestrians at junctions, this includes the use of advance cycle signalling. The development of Active Travel projects also considers filtered permeability, as a solution at suitable locations.</p> <p>The Council's Active Travel team will continue to liaise with internal and external stakeholders as projects are developed, to ensure the enhancement and safety of the public realm.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Road Space Reallocation</p>	<ul style="list-style-type: none"> <li>• People Before Profit state the need to complete cycle lanes with designs that allow for completely off-road segregated cycling to enable safe cycling for all. There are still many main roads that are completely unsafe for cyclists. One example is the Newcastle Road in Lucan from Adamstown to Lucan Shopping Centre. This is not part of the Cycle South Dublin programme but is urgently needed to reduce traffic here. (SD-C292-CAP-17)</li> <li>• HSE requests a more ambitious approach to safe walking and cycling infrastructure, including more detailed plans for increased access to safe, continuous, segregated cycle and walking infrastructure. (SD-C292-CAP-19)</li> <li>• Councillor Eoin Ó Broin states a motivation to roll out cycling infrastructure is to provide space for e-scooters which are currently using footpaths and unfortunately causing some nuisance there to pedestrians. E-scooters are cheaper to run than cars, have far lower emissions and lower ecological</li> </ul>	<p><b>CE Response</b></p> <p>As outlined in the Transport Section of the Draft Plan, promoting Active Travel is one of the Council's key action areas to address transport related emissions across the County.</p> <p>The range of Active Travel actions contained in the Draft Plan will progress opportunities to make walking and cycling more attractive and viable and target reasons that people choose not to cycle, with the goal of making the County one of Ireland's most cycle friendly counties.</p> <p>Segregated cycling and walking routes are considered as part of Active Travel schemes, as appropriate. The level of segregations depends on a variety of factors, including location context,</p>

	<p>footprint and ecological rucksack than cars, and also take cars off the road. Thus, an extensive protected cycling network can achieve many goals simultaneously. (SD-C292-CAP-25)</p>	<p>traffic movements, space availability and other matters. All schemes are designed having regard to the Design Manual for Urban Road and Streets (DMURS) and the national Cycle Design Manual.</p> <p>The Cycle South Dublin Programme commenced in 2021, with significant progress made on a range of projects. The identification of additional schemes will be undertaken in collaboration with the National Transport Authority and other stakeholders, as relevant.</p> <p>The Council's Active Travel team will continue to liaise with internal and external stakeholders as projects are developed, to ensure the enhancement and safety of the public realm.</p> <p>The Road Traffic and Roads Act 2023, addresses a range of matters, including to: make roads safer, speed up the roll-out of public transport, walking and cycling infrastructure, address the legal issues pertaining to e-scooters and clarify the legal position of e-bikes.</p> <p>It is noted that it is not permissible for e-scooters to use public footpaths in Ireland. The Road Traffic (Electric Scooter) Regulations, expected in 2024, will set out standards for E-scooters intended for use on public roads. Under the regulations, e-scooters will be required to use cycle lanes.</p> <p>Until the new regulations are in place, e-scooters will remain illegal for use on public roads. Once the</p>
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		<p>regulations are in place, those that do not comply with them will be illegal to be used on public roads.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Transport Planning</p>	<ul style="list-style-type: none"> <li>• SDCC Green Party Councillors state that road projects throughout SDCC must be climate proofed in terms of emissions. Create active transport strategies for major sporting/concert/festival events with online route maps and bike storage, bike rental. (SD-C292-CAP-22)</li> <li>• SDCC Green Party Councillors state reference to the Traffic Management Plan and its potential impact on emissions should be included. (SD-C292-CAP-22)</li> <li>• Dublin Cycling Campaign state in relation to Action T4: Delivery of a safe active travel network, Rather than simply measuring the number of linear metres added (T4), a more comprehensive ongoing evaluation of the Cycle South Dublin programme is needed. This could include measurements of modal split before and after the introduction of cycle tracks, and where the expected modal shift has not been achieved, an evaluation of the reasons, which could include unsafe junctions, lighting, etc. (SD-C292-CAP-14)</li> <li>• SDCC Green Party Councillors state that mode share targets in this plan should match those in the Climate Action Plan 2023. (SD-C292-CAP-22)</li> <li>• Councillor Derren Ó Brádaigh states that the Council should work with the National Transport Authority, to facilitate bi-annual meetings at full Council meetings to better understand service level deficit concerns and other issues. (SD-C292-CAP-10).</li> </ul>	<p><b>CE Response</b> The Transport Section of the Draft Plan includes seven key action areas to address transport related emissions across the County, including active travel and embedding modal shift in communities. With regard to reducing emissions, Active Travel is considered in all new road projects across the County. The Council continues to deliver the Cycle South Dublin programme which will provide a fully connected network over the initial eight years of the programme.</p> <p>The range of Active Travel actions contained in the Draft Plan will progress opportunities to make walking and cycling more attractive and viable and target reasons that people choose not to cycle, with the goal of making the County, one of Ireland's most cycle friendly counties and reduce greenhouse gas emissions from the transport sector.</p> <p>With regard to traffic management and development across the County, climate action and transport are core policy objectives of the County Development Plan (CDP) 2022-28. The promotion of a compact urban form of</p>

	<ul style="list-style-type: none"> <li>• Irish Green Building Council state Action T24 and the objective of minimising the use of virgin materials in road construction projects is welcomed, the IGBC believe that measuring the whole life carbon impact of road construction projects and prioritising them would be a better approach. See Whole Life Carbon in Construction and the Built Environment in Ireland - Today, 2030, 2050 section on infrastructure. (SD-C292-CAP-3)</li> <li>• Future of Dublin state the need for TII to convert one existing laneway of northbound M50 traffic to bus/taxi/car-share lane only. (SD-C292-CAP-1)</li> </ul>	<p>development is a central part of mitigating climate change. The range of policies and objectives of the CDP seek to provide for a consolidated urban form within existing settlements that are integrated with existing and planned public transport and the delivery of social and physical infrastructure.</p> <p>It is noted that regarding roads projects and climate adaptation, Actions are included in the Draft Plan. Furthermore, the Council takes account of the Climate Action Regional Office (CARO) led guidance document, 'Guidance for Local Authorities on the Climate Adaptation of Regional and Local Roads'.</p> <p>Traffic Management Plans for construction and development projects are dealt with as part of the Development Management process.</p> <p>The monitoring of Active Travel projects is undertaken in accordance with the guidelines as set out by the National Transport Authority, ensuring consistency at a national scale. Modal share targets for the County, are included in the County Development Plan 2022-28 and are consistent with the with the NTA's Transport Strategy for the Greater Dublin Area (2016-2035).</p> <p>Climate targets for the transport sector are set at a national level, as required by the Climate Action and Low Carbon Development (Amendment) Act 2021. The national Climate Action Plan sets out that the ambitious target for the transport sector</p>
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		<p>to reduce emissions by 50% by 2023. The actions included in the national Climate Action Plan reflect an 'all of society' approach to addressing climate action.</p> <p>The Council's Active Travel team will continue to liaise with the National Transport Authority and other external stakeholders, as projects are developed, to ensure the enhancement and safety of the public realm. This may include related briefings for Councillors as projects develop.</p> <p>The Council endeavours to minimise the use of virgin materials in roads projects. Transport Infrastructure Ireland (TII) has published an update to the Specification for Roadworks, CC-SPW-00900 Road Pavements – Bituminous Materials (Oct 23). The related requirement for the bituminous industry to provide Environmental Product Declarations for all bituminous mixtures, will assist in the carbon footprint reduction of roads projects.</p> <p>The consideration of whole life carbon impact of road construction projects, is within the remit of Transport Infrastructure Ireland (TII) and the National Transport Authority and is beyond the scope of the Draft CAP.</p> <p>The M50 is within the direct remit of Transport Infrastructure Ireland (TII). Modifications to the M50 is beyond the scope of the Draft Plan.</p>
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		<p>Information on active travel options for major sporting/concert/festival events, is currently available on a number of public transport websites, including National Transport Authority (NTA), Dublin Bus, LUAS and others. The location of bike parking in the County is currently available on the Council's dedicated Active Travel website <a href="https://www.sdcc.ie/en/active-travel/">https://www.sdcc.ie/en/active-travel/</a></p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Cycle Parking</p>	<ul style="list-style-type: none"> <li>• SDCC Green Party Councillors note the need to invest in secure bike bunkers for shared Electric bikes, to be rolled out in parks to ensure longevity and security of the Ebike fleet and deter vandalism. Develop funding strands for adding bicycle parking for older multi residential units. Support structures for bike parking in residential developments including older multi-unit residential and residential schemes without gardens. (SD-C292-CAP-22)</li> <li>• Dublin Cycling Campaign state regarding Action T8 - whilst its positive to see the addition of improved bicycle parking facilities it would be important that planning applications of private developments are inspected to ensure provision of adequate bicycle parking as outlined when granted planning. There are numerous examples throughout the county where bicycle parking has not been provided to the standard or quantity as outlined in granted planning applications. (SD-C292-CAP-14)</li> <li>• Dublin Cycling Campaign state the needs for further integration of bike sharing programmes, secure, safe high quality bike parking at public transport stops (Luas, Train stations and bus-stops). The opportunities offered by multi-modal transportation</li> </ul>	<p><b>CE Response</b> As outlined in the Transport Section of the Draft Plan, promoting Active Travel is one of the Council's key action areas to address transport related emissions across the County. The Draft Plan also includes Actions in relation to cycle parking, T7 and T8.</p> <p>The range of Active Travel actions contained in the Draft Plan will progress opportunities to make cycling more attractive and viable and target reasons that people choose not to cycle, with the ultimate goal of making the County one of Ireland's most cycle friendly counties.</p> <p>The location of bike parking in the County is currently available on the Council's dedicated Active Travel website <a href="https://www.sdcc.ie/en/active-travel/">https://www.sdcc.ie/en/active-travel/</a></p>

	<p>solutions should not be limited to the consideration of park and ride facilities for motor vehicles. Page 69 T3: it is recommended that this action be expanded to multi-modal journeys and more focus is given to high quality cycle facilities at transport hubs. (SD-C292-CAP-14)</p> <ul style="list-style-type: none"> <li>• Codie Preston states that Tallaght village has an appalling provision of bike racks to safely lock a bike. The following cycle parking spaces are noted: <ul style="list-style-type: none"> <li>- Main Street (Ulster bank to the dragon Inn) 30 Car vs Bike 4 spaces</li> <li>- Village green (AIB to Leisureplex) Car 11 vs Bike 0</li> <li>- parking square at Molloy's/Leisure plex Car 90 approx. vs Bike 0</li> <li>- new Bancroft square and pedestrian area (by Iceland) Car 0 v Bike 0</li> <li>- Abberley square (Abberley hotel, Smyths Toys, etc) Cars 150-200 approx. vs Bikes 0</li> </ul> <p>The following important places have no bicycle racks outside and easily could have:</p> <ul style="list-style-type: none"> <li>- AIB, Ulster Bank, Spar, Molloy's Bar, Costa Coffee (near Lidl), Macari's, Smyths Toys, Any takeaway places, Leisureplex, Abberley hotel and bar etc. (SD-C292-CAP-29)</li> </ul> </li> <li>• Codie Preston states that a lack of cycle parking facilities forces cyclists into locking bikes to railings and traffic signposts and can create problems for pedestrians. The space needed for just one car can provide 5 racks for bicycles, 250 bicycle racks could be provided in the area. (SD-C292-CAP-29)</li> <li>• Codie Preston states that spiral racks are not suitable for locking a bike as a wheel can be easily removed and the rest of the bike stolen. (SD-C292-CAP-29)</li> </ul>	<p>The extension of existing bike parking facilities and expanded design options for this infrastructure in the County, can be considered in consideration of the 2024 funding allocation from the National Transport Authority (NTA).</p> <p>It is noted that the provision of cycle parking at public transport locations is within the remit of the National Transport Authority (NTA).</p> <p>With regard to cycle parking provision in new developments, these standards are included in the County Development Plan 2022-28. Where there is evidence or concern that planning applications have not been carried out according to their permission, this should be advised to the Planning Enforcement Unit within the Planning Department, whereby such matters will be investigated.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
Decarbonising SDCC Fleet	<ul style="list-style-type: none"> <li>• Councillor Derren Ó Brádaigh states the transition of the Council's fleet estimated to be approximately 250 vehicles to electric - A more ambitious target of 50% should be adopted by</li> </ul>	<p><b>CE Response</b> As outlined in the Transport Section of the Draft Plan, SDCC Fleet and Staff Mobility to, from, and</p>

	<p>the Council in the plan, as opposed to the 31% target currently set out in the Draft Plan. (SD-C292-CAP-10)</p>	<p>during work, is one of the Council's key action areas to address transport related emissions.</p> <p>The Council's fleet is made up of approximately 250 vehicles, which are predominately internal combustion engine (ICE) vehicles, and which accounted for 9.1% of the Council's total emissions in 2021.</p> <p>The Council has developed a Fleet Transition Strategy, which includes five-year and ten-year targets to decarbonise the fleet and ensure the 2030 emission targets are met. The Council aims to ensure that all new vehicles purchased or replaced in the fleet are EVs charged from renewable sources or powered by renewable fuels.</p> <p>For clarification, it is noted that to meet the emissions reduction target of 50%, at least 31% of the fleet will need to be upgraded by 2030.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Clean Air</p>	<ul style="list-style-type: none"> <li>HSE state that the European Environment Agency recommends the establishment of 'clean air zones' around schools to reduce the concentration of pollutants found there. Lower pollution levels can be achieved through restrictions on traffic, such as no-idling zones around schools, 'school streets' (i.e. with a traffic ban at the start and end of the school day in the immediate vicinity of the school), or relocation of drop off/pick up points away from school entrances. We would welcome this</li> </ul>	<p><b>CE Response</b></p> <p>The Transport Section of the Draft Plan includes seven key action areas to address transport related emissions across the County, including active travel and embedding modal shift in communities.</p> <p>The reduction in greenhouse gas emissions from the implementation of the Actions included in the Draft CAP, will assist in improving air quality,</p>

	<p>consideration in the Climate Action Plan as a nudge away from private transport towards more active travel. (SD-C292-CAP-19)</p> <ul style="list-style-type: none"> <li>• SDCC Green Party Councillors state Council vehicles should have a no-idling policy. Support the implementation of the GDA Cleaner Air Strategy. (SD-C292-CAP-22)</li> </ul>	<p>thereby impacting positively on health and quality of life.</p> <p>The Council will consider no-idling strategies as part of the upcoming Fleet Transition Strategy, which includes five-year and ten-year targets to decarbonise the fleet and ensure the 2030 emission targets are met.</p> <p>With regards to schools and clean air, Action T11 of the Draft Plan relates specifically to the Safe Routes to Schools Programme (SRTS) and the implementation of the School Streets initiative. The development of these schemes is within the direct remit of An Taisce and the National Transport Authority. As such, the designation of clean air zones around schools is beyond the scope of the Draft CAP.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
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#### 4.9 Submissions on Section 5 Flood Resilience

Issue	Issue Summary	CE Response and Recommendation
Misconnections	<ul style="list-style-type: none"> <li>• HSE state industrial misconnections also need to be systematically identified and rectified by relevant statutory agencies in accordance with wastewater regulations. (SD-C292-CAP-19)</li> <li>• SDCC Green Party Councillors request to create a targeted communications to areas where mis-connection is a known problem, offering advice on repair. (SD-C292-CAP-22)</li> </ul>	<p><b>CE Response</b></p> <p>The Flood Resilience Section of the Draft Plan includes key action areas to address flood resilience across the County, including implementation of Sustainable Urban Drainage Systems (SuDS) / Surface Water Management.</p>

		<p>The main objective of the EU Water Framework Directive (WFD) is to protect and restore water quality in both surface and groundwater. The County Development Plan, Policy IE3, outlines the Council's role in protecting and enhancing the ground and surface water quality, by implementing measures to address domestic and industrial misconnections to the drainage network in the County.</p> <p>The Flood Resilience Section of the Draft Plan, includes key action areas to address flood resilience across the County, including implementation of Sustainable Urban Drainage Systems (SuDS) / Surface Water Management. As stated in the Draft Plan, the Dublin Urban Rivers LIFE (DURL) Project seeks to improve water quality and promote water quality improvement in urban areas by carrying out domestic misconnection inspections, using a GIS-based approach. The DURL project has undertaken a significant body of work, to address water quality and aquatic biodiversity in urban areas, by identifying and repairing domestic misconnections and where suitable, providing integrated constructed wetlands in public parks, to treat and improve water quality.</p> <p>The Council will continue to identify and address both domestic and industrial misconnections, to the drainage network in the County. Lessons learned from the DURL Project, including the improvement of detection methods through the use of a GIS-based approach, is currently being</p>
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		<p>implemented across the Section. SDCC will continue to develop guidance and advice for the public in relation to avoidance, resolving and the environmental risk associated with misconnections.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Flood Alleviation</p>	<ul style="list-style-type: none"> <li>• SDCC Green Party Councillors state while we understand the maintenance and operation of the sewer system is the responsibility of Uisce Éireann, the Council can and should play a role in reducing the volume of water that flows into sewers during rainfall events. (SD-C292-CAP-22)</li> <li>• John O'Leary states 1) ensure Works are pursued to prevent flooding in known problem areas. 2) ensure Waterways and Drains are well maintained. 3) ensure no further building in known flood areas, e.g. Rathcoole Woodlands whose Hydrology helps prevents local area flooding. (SD-C292-CAP-28)</li> <li>• Uisce Éireann state we would welcome inclusion of a commitment to explore strategic collaboration between South Dublin County Council and UÉ on Integrated Drainage Planning in the Climate Action Plan. (SD-C292-CAP-4)</li> <li>• Eoghan Brophy states the completion of the Camac flood alleviation scheme should be undertaken in liaison with locally knowledgeable interest groups and lifelong residents. (SD-C292-CAP-9)</li> <li>• HSE submission states suggest special consideration should be given to healthcare settings and facilities in the context of flood resilience and response e.g. primary care centres, hospitals, and residential care facilities. These structures are vital for human health and provision of essential services in the event of</li> </ul>	<p><b>CE Response</b> The Flood Resilience Section of the Draft Plan includes key action areas to address flood resilience across the County, including adaptation to increased flood events (flood defence, monitoring, flood response).</p> <p>As stated in the Draft Plan, the actions to adapt to climate change and to increase flood resilience can result in other benefits for South Dublin County, including improving water quality, thereby impacting positively on biodiversity, human health and quality of life.</p> <p>Surface water discharge to the sewer system is being reduced by the introduction of SuDS (Sustainable Urban Drainage Systems) at the planning stages of proposed future developments. Such development proposals are recommended to have separate foul and surface water drainage systems, where there is insufficient SuDS to cater for surface water flow.</p>

	<p>flooding, and by definition have vulnerable populations on-site. (SD-C292-CAP-19)</p>	<p>Planning applications are assessed against flood risk through the application of the 'Planning System and Flood Risk Management Guidelines for Planning Authorities'. This sets out where certain development is not appropriate within different flood zones, which are identified through the Catchment Flood Risk Assessment and Management (CFRAM) Programme and Development Plan Strategic Flood Risk Assessment, in addition to site specific flood risk assessments. This includes proposals for healthcare settings and facilities.</p> <p>In relation to integrated drainage planning, SDCC will continue to work with other agencies, including Uisce Éireann, in the development of current and future integrated drainage schemes. With regard to the Camac Flood Alleviation Scheme, during the duration of the scheme, Public Consultation events will take place at relevant milestones, to enable all local residents and other stakeholders, to provide input.</p> <p>It is noted that Rathcoole woodlands are zoned as 'rural' in the South Dublin County Development Plan 2022-28 and have a Specific Local Objective (G17 SLO 2) as follows: 'To ensure the adequate protection and augmentation of the identified Alluvial Rathcoole Woodlands within the zoning RU, and in recognising their value as green infrastructure and the potential linkages to Lugg Woods and Slade Valley and other amenity areas,</p>
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		<p>provide for sensitive passive amenity uses which have regard to their Annex 1 status'.</p> <p>Flood alleviation, retention and attenuation within the Rathcoole area is under consideration as part of the Camac Flood Alleviation Scheme, which considers the catchment of the Camac River. Any interventions required as part of flood alleviation / prevention will be considered in line with the requirements of the Scheme.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Sustainable Urban Drainage Systems (SuDS)</p>	<ul style="list-style-type: none"> <li>• SDCC Green Party Councillors state for minor works, create awareness and knowledge building among residents and business along flood areas, with timelines for completion of flood mitigation measures. Targeted flood measures such as rain gardens, swales and other SuDS systems to be built into the urban environment where storm sewer overflows are most frequent. (SD-C292-CAP-22)</li> <li>• Four Districts Woodland Habitat Group states it would be of benefit to the public to list the minor work schemes mentioned on page 77. It would also benefit the Council as this could encourage local knowledge input. Additional actions to consider under flood resilience: Actively discouraging garden paving Promoting retrofitting of SuDS where gardens have been paved Use Rathcoole Park as a public demonstration for F9 and F10. (SD-C292-CAP-27)</li> <li>• Councillor Eoin Ó Broin states there is almost no awareness among the general public of how increased paving/cobble locking of driveways and back gardens causes more water to run</li> </ul>	<p><b>CE Response</b></p> <p>The Flood Resilience Section of the Draft Plan includes key action areas to address flood resilience across the County, including implementation of Sustainable Urban Drainage Systems (SuDS) / Surface Water Management.</p> <p>Sustainable Urban Drainage Systems (SuDS) are a way of managing rainfall and surface water, that mimics drainage processes found in nature. As stated in the Draft Plan, the actions to adapt to climate change and to increase flood resilience can result in other benefits for South Dublin County, including improving water quality, thereby impacting positively on biodiversity, human health and quality of life.</p> <p>SDCC's 'SuDS Explanatory, Design and Evaluation Guide' is a tool to ensure a consistent approach in</p>

	<p>into the storm water system thus putting more water into the same rivers. (SD-C292-CAP-25)</p> <ul style="list-style-type: none"> <li>• HSE recommends the inclusion of rainwater harvesting (RWH) be included as a Resource Management Strategy to help adapt to drought conditions but also to reduce demand on treated water from Uisce Éireann. (SD-C292-CAP-30)</li> <li>• Uisce Éireann would welcome in particular consideration of the following recent DHPLG and Transports guidance: Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document National (Infrastructure) Guidelines and Standards Group recent NGSG Circular 1 of 2023, and DMURS Advice Note 5 Road and Street Drainage using Nature Based Solutions Greening and Nature-based SuDS for Active Travel Schemes - National Transport Guidance for Urban watercourses by Inland Fisheries Ireland. (SD-C292-CAP-4)</li> <li>• Irish Green Building Council state SDCC could probably do more to raise awareness about the negative impact of soil sealing, and the benefits of SuDS. For instance, SDCC could encourage the use of the Home Performance Index, and more specifically indicator EN 3.0: Surface Water Runoff in all new residential developments. SDCC could also explore the 'sponge city' concept as implemented in Copenhagen. (SD-C292-CAP-3)</li> </ul>	<p>the design of surface water management systems across all new developments. The application of this guidance is now mandatory for all new developments and ties in with the Green Infrastructure (GI) strategy for the County, which forms part of the County Development Plan 2022-28.</p> <p>SuDS is also promoted through the Householders Guide (including rainwater harvesting), which is available online on the Council's website. The public can also contact the Council's Water Services Section for information on local projects and for maps showing areas that are at risk of flooding and areas to avoid development through the Office of Public Works (OPW) flood maps, which are available online.</p> <p>The Water Services Section is also carrying out a survey on surface water capacity and potential improvements for surface water at Newcastle, Rathcoole and Saggart.</p> <p>Rathcoole Park is notable for its use of water features in its layout and design. Any future proposals for Rathcoole Park will have regard to SDCC's SuDS Explanatory, Design and Evaluation Guide. The implementation of Draft Plan Actions F9 and F10 will consider sites across the County, based on relevance, attenuation opportunities and site suitability.</p>
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		<p>Flood alleviation, retention and attenuation within the Rathcoole area is under consideration as part of the Camac Flood Alleviation Scheme, which considers the catchment of the Camac River. Any interventions required as part of flood alleviation / prevention will be considered in line with the requirements of the Scheme.</p> <p>The Planning and Development Regulations set out where planning permission is required for the hard surfacing of front or back gardens. Where the area of hard surfacing is more than 25 square metres or more than 50% of the front, side or back garden, whichever is the smaller, planning permission is required. An exception to this is where the front or side garden is constructed using permeable materials or otherwise, allowing rainwater to soak into the ground.</p> <p>SDCC has taken an active role in highlighting the benefits of Sustainable Urban Drainage Systems (SUDs). The Householders Guide to SuDS has been published by SDCC and is available on the Council's website.</p> <p>With regard to updated policy and guidance, the Council's Active Travel team will continue to liaise with internal and external stakeholders as projects are developed, to ensure compliance with all relevant policies and standards.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
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#### 4.10 Submissions on Section 5 Nature Based Solutions

Issue	Issue Summary	CE Response and Recommendation
Chemical Use	<ul style="list-style-type: none"> <li>• Irish Green Building Council state it's unclear to us why N12 simply mentions a "reduction of the usage of chemicals, such as glyphosate, across all council departments". The objective should really be to eliminate the use of these chemicals. See for instance France, where public bodies are no longer allowed to use chemical pesticides. (SD-C292-CAP-3)</li> <li>• Thomas Weafer states that the use of all glyphosate based products should be ended immediately, rather than reduced by 2026. Nature friendly alternatives such as salt and vinegar, and mechanical removal by digging or hand weeding, should be used instead. (SD-C292-CAP-8)</li> <li>• MEP Ciarán Cuffe states while I welcome to initiative to reduce the use of glyphosate in South Dublin County Council, this dangerous herbicide should be banned from use completely as it is a harm not only to biodiversity but also to people's health. (SD-C292-CAP-21)</li> <li>• The Litter Mugs / Dodder action group states the use of chemicals such Glyphosate should stop with immediate effect. (SD-C292-CAP-12)</li> <li>• Codie Preston states SDCC should publicly publish the number of litres of glyphosate and other chemicals used each year and show the reduction over time. (SD-C292-CAP-29)</li> <li>• People Before Profit state we believe that the ending of the use of glyphosates for weed control must be a priority. Glyphosates are extremely harmful to the environment and human health and should be banned completely. This would require investment in alternative solutions such as increased staff for manual weeding using other methods. (SD-C292-CAP-17)</li> </ul>	<p><b>CE Response</b></p> <p>Action N12 of the Draft CAP relates to implementing a countywide reduction of the usage of chemicals, such as glyphosate, across all Council departments.</p> <p>The Council endeavours to minimise the use of glyphosate-based products and expects in time to phase it's use out, as alternative weed control methods and products become available and established.</p> <p>The Elected Members voted for the introduction of a partial ban on the use of glyphosate-based herbicides in public parks, public gardens and playgrounds and this partial ban continues to be implemented.</p> <p>In November 2023, the European Commission approved the use of glyphosate for a further period of 10 years, based on comprehensive safety assessments carried out by the EFSA (European Food Safety Authority) and the ECHA (European Chemicals Agency), in conjunction with EU member states.</p> <p>The Council complies with the requirements of the Sustainable Use Directive, in the use of plant protection products.</p>

		<p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Plans and Policies</p>	<ul style="list-style-type: none"> <li>• SDCC Green Party Councillors state 1. Set a target to increase the coverage of locally important biodiversity areas, setting out a list of areas to be considered for inclusion. 2. Strive to increase the number of protected trees in the county. 3. Prepare guidance for members of the public on how to report illegal hedge cutting and tree felling during bird nesting season. (SD-C292-CAP-22)</li> <li>• SDCC Green Party Councillors state a Reimagined Public Realm should include public realm improvement plans outside of the urban centres in our neighbourhoods' Specific plans for new parks and green areas should be listed. (SD-C292-CAP-22)</li> <li>• Uisce Éireann states we welcome the following action “GOV3 Ensure that all new SDCC Projects are assessed for the feasibility of incorporating climate actions and measures, with a focus on energy greenhouse gas emissions, nature-based SuDS, enhancing and retaining Green Infrastructure, biodiversity, sustainable transport and modal shift, EV charging, and environmental protection and co-benefits.” We would request however that this action be expanded to consider blue as well as green infrastructure and water efficiency as well as energy efficiency. (SD-C292-CAP-4)</li> <li>• Four Districts Woodland Habitat Group states the Draft CAP lists three Plans supporting Nature Based Solutions: SDCC’s Green Infrastructure Strategy, outlined in the County Development Plan 2022-2026 The SDCC Biodiversity Action Plan 2020-2026, ‘Connecting with Nature’, and ‘Living with Trees’, South Dublin County Council’s Tree Management Policy 2021-2026 The actions listed in the Draft CAP could be cross referenced with actions, in the above policies and plans for clarity, improved transparency, tracking and measuring. Better still, would be to integrate all the actions into a separate document/tracker. (SD-C292-CAP-27)</li> </ul>	<p><b>CE Response</b> As outlined in the Nature Based Solutions Section of the Draft Plan, supporting Green Infrastructure and addressing biodiversity loss, are two of the Council’s key action areas, to address nature based solutions for climate action across the County.</p> <p>The range of actions contained in the Draft Plan will progress opportunities to make parks, wetlands and riparian regions more attractive for the public, whilst addressing adaptation and mitigation measures. The actions included in the Draft Plan also aim to address biodiversity loss. As part of the implementation of the SDCC Biodiversity Action Plan, surveys of habitats and species in the county are on-going. These surveys will assist with the identification of areas of local biodiversity importance. Once complete, the protection, enhancement and expansion of these areas can be considered.</p> <p>Specific plans for new parks and green areas will be contained within SDCC Parks and Open Space Strategy, which is currently under development. This will also consider the existing parks and open spaces across the County and aim to enhance these amenities. With regard to stepping stone forests, the development of mini woodlands is included as Action N5 of the Draft CAP. The</p>

	<ul style="list-style-type: none"> <li>• People Before Profit state the Draft Climate Action Plan makes some good points about adaptation, and nature-based solutions to adaptation. However, these are extremely general and unspecific. It is the view of People Before Profit that we need to see much more specific detail on what kind of nature-based solutions, and other climate adaptation measures the council executive are proposing, and where these actions will occur. SD-C292-CAP-17</li> <li>• Christopher Conway states while the inclusion of a map of green corridors is extremely helpful, SDCC could perhaps raise more awareness about the importance of these ecological corridors, and of the role of private green gardens within these corridors. Going forward planning permission should be a requirement, if it is proposed to remove a private grassed garden area, and replace it with concrete, paving, tarmacadam, or artificial grass lawn. This might help in raising awareness of the negative impact of soil sealing, etc. SD-C292-CAP-31</li> <li>• The Irish Green Building Council state while the inclusion of a map of green corridors is extremely helpful, SDCC could perhaps do more to raise awareness about the importance of these ecological corridors, and of the role of private gardens within these corridors. This might help in raising awareness of the negative impact of soil sealing, etc. SD-C292-CAP-3</li> <li>• SDCC Green Party Councillors state SDCC should investigate if there is potential to develop a new national park in SDCC. SD-C292-CAP-22</li> <li>• Councillor Derren Ó Brádaigh states SDCC initiate engagement to work with all Dublin local authorities to develop a shared 'flagship' programme to identify suitable locations within all regional parks to begin the planting of urban stepping stone forests. (SD-C292-CAP-10)</li> </ul>	<p>Council can liaise with the other Dublin local authorities on this initiative, as necessary.</p> <p>SDCC has other Plans and Policies that more specifically target nature-based solutions, including the Green Infrastructure Strategy, outlined in the County Development Plan 2022-2028, the SDCC Biodiversity Action Plan 2020-2026, 'Connecting with Nature', and 'Living with Trees', South Dublin County Council's Tree Management Policy 2021-2026.</p> <p>With regard to protected trees in the County, Policy NCBH11 of the County Development Plan relates to reviewing Tree Preservation Orders within the County and maintain the conservation value of trees and groups of trees that are the subject of any Tree Preservation Order.</p> <p>It is noted that reporting illegal cutting, is beyond the scope of the Draft CAP. The enforcement of the Wildlife Act (reporting of in-season hedge and vegetation cutting) is within the remit of the National Parks and Wildlife Service.</p> <p>The definition of Green Infrastructure accounts for water / blue infrastructure projects: 'a strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services such as water purification, air quality, space for recreation and climate</p>
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		<p>mitigation and adaptation.’ (EU Strategy on Green Infrastructure 2013).</p> <p>The Draft Plan has been developed in accordance the Local Authority Climate Action Plan Guidelines, as published by the Minister for the Environment, Climate and Communication and includes a Climate Change Risk Assessment and a countywide Emissions Profile. The range of Nature Based Solution actions, included in the Draft Plan have a range of co-benefits and addresses both climate adaptation and mitigation. For example, parks and open spaces have a role in carbon sequestration, but also have an important function in surface water attenuation and helping to reduce the impacts of the urban heat island affect.</p> <p>The Draft Plan is a living document and additional actions will emerge over the lifetime of the Plan, for example further actions on climate adaptation and specific issues relating to urban areas, such as the urban heat island affect.</p> <p>To streamline the Draft Climate Action Plan (avoiding duplication of pre-existing Plans &amp; Policies), all Plans and Policies referenced throughout the Plan are adhered to, in the preparation of the Draft Plan. This approach will also apply to the implementation of the Plan.</p> <p>The Planning and Development Regulations set out where planning permission is required for the</p>
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		<p>hard surfacing of front or back gardens. Where the area of hard surfacing is more than 25 square metres or more than 50% of the front, side or back garden, whichever is the smaller, planning permission is required. An exception to this is where the front or side garden is constructed using permeable materials or otherwise, allowing rainwater to soak into the ground.</p> <p>SDCC has taken an active role in highlighting the benefits of Sustainable Urban Drainage Systems (SUDs). A Householders Guide to SuDS has been published by SDCC and is available on the Council's website.</p> <p>A number of workshops and talks on SuDS to highlight the issue, were held during Dublin Climate Action Week. The public can contact the Council's Water Services Section to access maps showing areas that are at risk of flooding and areas to avoid for development purposes. Office of Public Works (OPW) flood maps are also available online.</p> <p>The identification and development of a new National Park in the County is beyond the scope of the Draft CAP and is within the remit of the National Park and Wildlife Service, Office of Public Works and others.</p> <p>However, it is noted that there is a National Park that now stretches into South Dublin County, with 4,900 acres/1983 hectares added to the Wicklow</p>
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		<p>Mountains National Park, extending into the Featherbeds Glenasmole, of the Dublin Mountains. The National Parks and Wildlife Service (NPWS) and SDCC are both members of the board of the Dublin Mountains Partnership and work in partnership to ensure the recreational use of the Dublin Mountains is compatible with the conservation of the area's natural, built and cultural resources, which includes conservation of the most ecologically sensitive areas of the National Park.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Hedgerow Management</p>	<ul style="list-style-type: none"> <li>Christopher Conway states in general, untrimmed, thorny hedgerows containing shrubs such as blackthorn, whitethorn, holly, briars, ivy and brambles are favoured by birds as they provide food, shelter, nesting places and protection from predators during the breeding season. With regards to the law, SDCC were [not] compliant, in February this year. They or their agents, unnecessarily cut or it could be described more correctly as, flayed vegetation similar to the above all along the Bawnogue Road. From the entrance at the junction with new Nangor Road and ending near the Grand Canal at the Lindisfarne and Ashwood Road estates. The correct time to do this type of work if it's necessary should be in the month of September. As February is too near the breeding season, and as birds also need the shelter this vegetation provides in the winter months. SDCC should Consider proper cutting trimming instead of flaying, which may cause no regrowth in some vegetation. Regarding these observations SDCC should be proactive rather than reactive, and rather than the unnecessary cutting of vegetation. Their human and other resources could be diverted to other</li> </ul>	<p><b>CE Response</b> As outlined in the Nature Based Solutions Section of the Draft Plan, supporting Green Infrastructure and addressing biodiversity loss, are two of the Council's key action areas, to address nature based solutions for climate action across the County.</p> <p>The Council is currently preparing a Hedgerow Management Policy, which will inform the annual hedgerow maintenance programme. It is noted that reduced cutting of hedgerows helps to promote wildlife and biodiversity and this practice is implemented where possible, in locations such as public parks.</p> <p>Many of the hedgerows maintained by the Council are alongside public footpaths or cycle tracks and</p>

	<p>necessary maintenance tasks. For example, replacing damaged trees and fixing/straightening existing tree stakes or re-staking them. (SD-C292-CAP-31)</p> <ul style="list-style-type: none"> <li>• Christopher Conway states that SDCC should carry inspections to see if it's necessary for public safety reasons to cut back vegetation growth over boundary fences onto roadways or cycle/ pedestrian pathways and to remove the fallen leaves especially in Autumn. A case in point is the cycle/pedestrian way on both sides of the R113 and between the junction into Dunawley Estate and the junction with Thomas Omar Way North Clondalkin, and from the start of Thomas Omar Way to Kisogue College. Also, a lot of directional Signs are being obscured by overgrowth from trees or shrubbery in all the areas that SDCC have responsibility for. Failure to do these necessary tasks could cause accidents and leave SDCC open to litigation. (SD-C292-CAP-31)</li> </ul>	<p>these must be trimmed, at least once per year for reasons of public safety. From time to time, it is necessary for the Council to cut back hedgerows outside of the cutting season from 1<sup>st</sup> September to 28<sup>th</sup> February and such action would only be taken where it is necessary and in the interests of public safety. On occasions, the Council is requested by the Gardai to take such action, to assist them in dealing with anti-social or criminal activity, and in those circumstances, the Council complies with the requests from the Gardai.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Rewilding</p>	<ul style="list-style-type: none"> <li>• John O'Leary states ensure no building in Rathcoole Woodlands which is a Nature-based solution to climate change with its continuous carbon sequestration, mosaic of Biodiverse Habitats, Green Corridor and Hydrology. (SD-C292-CAP-28)</li> <li>• Patrick Kinsella states to re-wild as widely as possible as this will encourage habitat for wildlife. (SD-C292-CAP-2)</li> <li>• Community Gardens Ireland states South Dublin County Council should commit to opening and supporting a seed library, similar to the one established within Wicklow County Council and in Hollyhill Library in Cork City. (SD-C292-CAP-2)</li> <li>• Woodview Heights Resident's Association support biodiversity in open spaces and gardens and would value the support that SDCC can provide in setting up and maintaining these spaces. (SD-C292-CAP-26)</li> </ul>	<p><b>CE Response</b> As outlined in the Nature-Based Solutions Section of the Draft Plan, supporting Green Infrastructure and addressing biodiversity loss, are two of the Council's key action areas, to address nature based solutions for climate action across the County.</p> <p>Green infrastructure, such as trees and their ecosystems provide valuable habitats for wildlife, such as nesting birds, pollinators and other insects. Green infrastructure such as mini woodlands and wild meadows, can also provide food sources for wildlife. Providing networks of natural wildlife corridors through the urban</p>

		<p>environment, help animal and plant species migrate through the changing landscape.</p> <p>As part of the management of parks and open spaces, SDCC has been increasing land managed for nature restoration. This includes new wetlands, new mini-woodlands, native hedgerow management and restoration, managing extensive natural wildflower meadows and managing areas for natural regeneration.</p> <p>In the Draft Plan, Action N2 seeks to maintain and increase natural meadows, where appropriate, across the County.</p> <p>Specific plans for new parks and green areas will be contained within SDCC Parks and Open Space Strategy, which is currently under development. This will also consider the existing parks and open spaces across the County and aim to enhance these amenities.</p> <p>It is noted that Rathcoole woodlands are zoned as 'rural' in the South Dublin County Development Plan 2022-28 and have a Specific Local Objective (GI7 SLO 2) as follows: 'To ensure the adequate protection and augmentation of the identified Alluvial Rathcoole Woodlands within the zoning RU, and in recognising their value as green infrastructure and the potential linkages to Lugg Woods and Slade Valley and other amenity areas, provide for sensitive passive amenity uses which have regard to their Annex 1 status'.</p>
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<p>Tree Planting</p>	<ul style="list-style-type: none"> <li>Patrick Kinsella states to plant more trees and saplings to capture carbon. (SD-C292-CAP-2)</li> <li>The Litter Mugs / Dodder Action group states in February of 2023 SDCC councillors voted unanimously to pass the following motion: "In line with the Biodiversity and Climate Emergencies declared for South Dublin County Council in 2019 that this Council commits to a rapid roll-out of Mini-Woodlands / Stepping Stone Forests at suitable locations countywide with the support of local community groups and with a target of 25,000 trees by the end of this term."</li> </ul>	<p><b>CE Response</b> As outlined in the Nature Based Solutions Section of the Draft Plan, supporting Green Infrastructure and addressing biodiversity loss, are two of the Council's key action areas, to address nature based solutions for climate action across the County.</p>

	<p>We are in danger of missing this target as the soil has been prepared for the planting for just one forest of 3,000 trees. That represents just 12% of the target mentioned in the motion. This is a short-term target that is eminently achievable, but SDCC should build upon this by achieving far more ambitious targets for the lifetime of the Climate Action Plan. (SD-C292-CAP-12)</p> <ul style="list-style-type: none"> <li>• Four Districts Woodland Habitat Group states that currently there is a deficit of native woodland and the Council has an opportunity to set aside Council lands to establish continuous cover native woodland, thus creating biodiversity opportunities. The Council is encouraged to identify current SDCC owned lands with Woodland and manage for their preservation. (SD-C292-CAP-27)</li> <li>• Four Districts Woodland Habitat Group states that the Council needs to expand its view of hedgerows and woodland beyond parks in its care to other lands that it owns, and to include the broader County. Action N6 is at odds with itself, with an action for hedgerows and woodlands in urban areas on one hand and parks on the other yet has a tracking measure to quantify the carbon impact of the County's trees. 1. The Council needs to have an evidence-based quantification of the County's Green Infrastructure and draw on the expertise and assistance of other organisations in this sphere. It is acknowledged that the Council has moved in the right direction concerning hedgerows, biodiversity and the environment in their assessments of planning applications but more needs to be done. (SD-C292-CAP-27)</li> <li>• Christopher Conway states that just recently over 150 to 200 mature and semi mature trees have been removed in the Clondalkin Clonburriss SDZ (Seven Mills and the back of Ashwood Estate) area by SDCC or contractors working on its behalf. While it is understood that this is to facilitate much needed housing in this area - it should be policy that for every tree that has to be removed three or more should be replanted. There are large green public areas in Clondalkin that are devoid of trees. For example, the areas adjacent to the</li> </ul>	<p>Green infrastructure, such as trees and their ecosystems provide valuable habitats for wildlife, such as nesting birds, pollinators and other insects. Green infrastructure such as mini-woodlands and wild meadows, can also provide food sources for wildlife. Providing networks of natural wildlife corridors through the urban environment, help animal and plant species migrate through the changing landscape.</p> <p>In the Draft Plan, Action N1 relates to managing tree mapping data and ensure the maintenance of the tree management system, to evaluate carbon sequestration data associated with trees in South Dublin County and investigate further opportunities for carbon sequestration where possible. Additionally, Action N3 aims to increase native tree planting across the County and to retain existing native trees in South Dublin County, in so far as possible.</p> <p>The actions in the Draft Plan are supported by SDCC's Tree Management Policy 2021-2026, 'Living with Trees'. This outlines in more detail, the protection of existing trees and woodlands and the management of these amenities, to ensure they thrive to their full potential. As such, the enforcement of established trees is beyond the scope of the Draft Plan.</p> <p>The Council has been involved in the planting of a number of mini-woodlands in recent years and were assisted by a number of schools and local</p>
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	<p>R113 boundary Cherrywood Avenue and Clondalkin Leisure Centre and Moyle Park College, and the area between Alpine and Ashwood Estates and the boundary between these estates and the R113, and along the banks of the Grand Canal. To promote biodiversity and wildlife, the old hedgerow that is also between these two estates needs to be replanted as there are large gaps in parts. Some gaps are due to storm and bad weather damage over the years, and part of it was removed by SDCC for access to build the pedestrian and cycle path between the Bawnogue shopping centre and the boundary of the R113. (SD-C292-CAP-31)</p> <ul style="list-style-type: none"> <li>• Codie Preston states stepping stones forests have led in this space and should be made a formal partner of SDCC in the roll out of Miyawaki Forests. (SD-C292-CAP-29)</li> <li>• Councillor Eoin Ó Broin states that the Social Democrats call for SDCC to engage with central government to access funding to purchase land, perhaps in the Dublin Mountains to plant Native Irish forests. (SD-C292-CAP-25)</li> <li>• HSE submission states we would like to see protection and enforcement of established trees enhanced in this plan. (SD-C292-CAP-19)</li> <li>• Litter Mugs / Dodder Action state the vast majority of planting and landscaping in social housing estates should consist of native Irish species of plants and trees. (SD-C292-CAP-12)</li> </ul>	<p>environmental groups, in delivering this initiative. The Public Realm Section tries to plant as many native tree species as possible across the County, in the annual tree planting programme.</p> <p>The County Development Plan 2022-28 addresses the Green Infrastructure assets of the County, at a strategic level. The Green Infrastructure Strategy, including the Green Infrastructure Strategy Map, is based on a detailed landscape character assessment, undertaken as part of the County Development Plan process. Regarding the provision of an evidence-based quantification of the County's Green Infrastructure, SDCC has developed a Green Space Factor which quantifies Green Infrastructure on the ground in individual development sites, in order to ensure that development sites achieve a minimum Green Infrastructure score.</p> <p>Any areas of inadequate tree coverage will be identified and included in those tree planting plans in future years. Trees which must be removed to facilitate development are replaced in general at a ratio of three new trees for every tree removed.</p> <p>The Council is currently preparing a hedgerow Management policy which will inform an annual hedgerow maintenance programme going forward.</p>
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		<p>South Dublin County Council will continue to engage with Coillte and other partners in the development of this programme and examine if further co-ordinated and complementary actions can enhance the proposed actions regarding the transition to broadleaf and mainly native woodlands.</p> <p>It is noted that Action N8 of the Draft Plan relates to continuing to implement Dublin Mountains Makeover with Coillte Nature and the Dublin Mountains Partnership, exploring opportunities for native tree planting projects to manage surface water run-off from mountainous areas to reduce flooding downstream.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Community Allotments</p>	<ul style="list-style-type: none"> <li>Community Gardens Ireland state 1) South Dublin County Council to immediately reinstate the wording and actions to maintain and expand community gardens and allotments for local food production from the 2019-2024 Climate Action Plan. The KPI for this will be the number (and increase in number) of allotments and community gardens in South Dublin County Council. 2) South Dublin County Council to commit to performing a review of idle, vacant and derelict land within South Dublin County Council that could be used for community growing purposes. (SD-C292-CAP-13)</li> <li>Woodview Heights Resident's Association (WHRA) states as a community we are open to trial opportunities to grow our own food in community spaces and to trial community composting with the support of SDCC. (SD-C292-CAP-26)</li> </ul>	<p><b>CE Response</b></p> <p>The important role of community allotments and community gardens is recognised with regard to local food production. The Intergovernmental Panel on Climate Change (IPCC) has recognised that water, soil, biodiversity and food systems are all at risk due to climate change, making it essential that sustainability and resilience of the food system is addressed. This is also an important consideration in delivering a just transition to climate change.</p> <p>GI6 Objective 10 of the County Development Plan 2022-28 states to continue to protect and</p>

	<ul style="list-style-type: none"> <li>• Councillor Derren O’Brádaigh states community gardens and allotment programmes need to be expanded to all parts of the county to address current demand. (SD-C292-CAP-10)</li> </ul>	<p>promote existing allotments and provide for new allotments where feasible in accordance with a review of the provision and management of allotments across the County. The Council has published the Allotments Policy 2023, which sets out the process for allotment provision across the County.</p> <p>SDCC has made provision within the capital budget for the delivery / expansion of new allotments across the county. Having regard to the above, it is considered that a non-material modification be made to the Draft Plan regarding the provision of community allotments and community gardens.</p> <p><b>CE Recommendation</b></p> <p>The following new actions to be included in the Nature Based Solutions section of the Draft Plan:</p> <ul style="list-style-type: none"> <li>• <b>Maintain and expand allotments for local food production across the County, in accordance with SDCC’s Allotments Policy.</b></li> <li>• <b>Support the provision of Community Gardens for local food production across the County, in partnership with Community Centres, Schools and other local groups.</b></li> </ul>
<p>Demonstration Sites</p>	<ul style="list-style-type: none"> <li>• Four Districts Woodlands Group are proposing Rathcoole Park, Rathcoole Woodlands (with an identified alluvial woodland) and the locally referred to GAA lands which are unmanaged with rewilding willow woodland as a public demonstration site for Nature based</li> </ul>	<p><b>CE Response</b></p> <p>As outlined in the Nature Based Solutions Section of the Draft Plan, supporting Green Infrastructure and addressing biodiversity loss, are two of the</p>

	<p>solutions. We are advocating for: Retention of all woodland in the vicinity of Rathcoole Park for their natural flood retention/attenuation function, Possibly increasing the flood retention function of Rathcoole Woodlands in the vicinity of the springs Implementing nature based solutions or soft engineering natural flood retention measures along the well-used paths within Rathcoole Woodlands, Putting in nature based solutions or functional soft engineering natural flood retention measures in Rathcoole Park that will also act as public demonstration of sustainable drainage or natural flood retention features.</p> <p>Implementing nature based solutions for flood management of the paths and playing fields in Rathcoole Park. Retaining or slow release of water in general from the catchments of the Crockshane and Coolmine Streams to the Camac, to reduce or prevent downstream flooding such as occurs in Corkagh Park. (C292-CAP-27)</p> <ul style="list-style-type: none"> <li>• Four Districts Woodland Habitat Group states that a simple action would be to provide simple demonstration projects to communicate to people what Nature Based Solutions and other climate actions look like. Rathcoole Park and Woodlands would be a great public demonstration site for Flood Resilience, Nature based solutions to climate change, SuDS and development of further natural flood under F9, F10 and F15, and N7 and N9. (SD-C292-CAP-27)</li> <li>• Codie Preston states all public parks should create, maintain and manage an outdoor classroom that can be booked and used by local schools throughout the year. Using our parks for education was recommended by the recent citizens assembly for biodiversity loss. (SD-C292-CAP-29)</li> </ul>	<p>Council's key action areas, to address nature based solutions for climate action across the County.</p> <p>Action F10 of the Draft Plan relates to identifying four demonstration sites or pilot schemes to monitor different SuDS projects, demonstrating how to combine SuDS/flood attenuation systems with existing land uses.</p> <p>The Council is currently undertaking a number of flood alleviation schemes, including the River Camac Flood Alleviation Scheme. Such schemes seek to combine building physical flood defences with nature-based solutions. The Camac Flood Alleviation Scheme is currently at options stage and will consider issues for the whole of the Camac River and catchment area.</p> <p>With regard to downstream flooding, Action F4 of the Draft Plan relates to engaging regularly with neighbouring local authorities and other relevant organisations, on regional flood management issues, and support the ongoing implementation of flood forecasting systems.</p> <p>SDCC will also progress flood alleviation schemes in the County, in conjunction with the Office of Public Works (OPW), having due regard to the need to promote nature-based solutions and Sustainable Urban Drainage Systems (SuDS) and environmental sensitivities at these locations,</p>
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		<p>including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.</p> <p>It is noted that Rathcoole woodlands are zoned as 'rural' in the South Dublin County Development Plan 2022-28 and have a Specific Local Objective (GI7 SLO 2) as follows: 'To ensure the adequate protection and augmentation of the identified Alluvial Rathcoole Woodlands within the zoning RU, and in recognising their value as green infrastructure and the potential linkages to Lugg Woods and Slade Valley and other amenity areas, provide for sensitive passive amenity uses which have regard to their Annex 1 status'.</p> <p>Rathcoole Park is notable for its use of water features in its layout and design. Any future proposals for Rathcoole Park will have regard to SDCC's SuDS Explanatory, Design and Evaluation Guide.</p> <p>Flood alleviation, retention and attenuation within the Rathcoole area is under consideration as part of the Camac Flood Alleviation Scheme, which considers the catchment of the Camac River. Any interventions required as part of flood alleviation / prevention will be considered in line with the requirements of the Scheme.</p> <p>The implementation of Draft Plan Actions relating to demonstration sites, will consider sites across</p>
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		<p>the County, based on relevance, attenuation opportunities and site suitability.</p> <p>With regard to outdoor classrooms, public parks across the County already contain many facilities and infrastructure that can be used for educational purposes. Signage is erected at many locations informing park users of wildlife etc. in the park and links are created with the Council website through the use of QR codes.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Wetlands/Ponds</p>	<ul style="list-style-type: none"> <li>• Councillor Derren Ó Brádaigh states the Integrated Wetlands Construction programme is immediately expanded to include new wetlands sites to include Lucan Demesne, Corcagh Park, Waterstown Park, Corcagh Park and Rathcoole Park. Potential sites on Council-owned lands that are deemed to be at flood risk and not anticipated to be viable for future residential zoning are now considered (in part at least) for additional wetlands construction and parklands. (SD-C292-CAP-10)</li> <li>• The Litter Mugs / Dodder Action group state SDCC should support the DURL program by assisting every school in the County to create their own pond. (SD-C292-CAP-12)</li> </ul>	<p><b>CE Response</b></p> <p>As outlined in the Nature Based Solutions Section of the Draft Plan, supporting Green Infrastructure and addressing biodiversity loss, are two of the Council's key action areas, to address nature based solutions for climate action across the County.</p> <p>As outlined in the Draft Plan, Integrated Constructed Wetlands have been constructed as part of the Dublin Urban LIFE (DURL) project. The purpose of the project is to improve water quality and aquatic biodiversity in urban areas by finding and resolving domestic misconnections in the first instance and were suitable and required, by building wetlands in public parks to treat and improve water quality.</p>

		<p>A survey of the ponds and wetlands in SDCC parks commenced this year and will continue in 2024. Part of the survey is the provision of recommendations for improving biodiversity and water quality.</p> <p>Specific plans for new parks and green areas will be contained within SDCC Parks and Open Space Strategy, which is currently under development. This will also consider the existing parks and open spaces across the County and aim to enhance these amenities.</p> <p>The Environmental Awareness Section delivers a comprehensive Environmental Education Programme, which includes delivering the Green Schools Programme. Consideration of local school ponds can be considered as part of this programme.</p> <p><b>CE Recommendation:</b> No Change to the Draft Plan.</p>
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#### 4.11 Submissions on Section 5 Circular Economy and Resource Management

Issue	Issue Summary	CE Response and Recommendation
Awareness Raising	<ul style="list-style-type: none"> <li>Christopher Conway suggests SDCC should inform the papers and their elected councillors as to the amounts of all the waste items that were collected and disposed of [at drop off open days] and, probably at a far lower cost to their budgets and to the environment. (SD-C292-CAP-31)</li> </ul>	<p><b>CE Response</b> As outlined in the Community Engagement Section of the Draft Plan, engaging citizens on climate change is one of the Council's key action areas.</p>

		<p>SDCC has significant experience in engaging citizens and stakeholders through its existing functions, for example, land-use planning, housing, employment, transport, environmental awareness, sports partnerships, Public Participation Networks (PPNs) and a range of other programmes and initiatives. The Draft Plan includes a range of awareness raising actions as part of the Community Engagement section of the Draft Plan. It is important to leverage this experience as part of SDCC's Climate Action Plan, while also looking for new and innovative opportunities for engagement across communities in South Dublin. Community engagement opportunities should assist and empower local communities to contribute to South Dublin's transition to a low carbon and climate resilient County, as part of the wider Dublin region.</p> <p>The Council commits to publishing waste collection figures across its social media channels.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Green Enterprise</p>	<ul style="list-style-type: none"> <li>• Ciaran Cuffe, MEP suggests another excellent way to involve the local community in the green transition, would be to incentivise climate-friendly businesses and local entrepreneurs with green business models. This could be achieved through public meetings and one-stop-shops in South Dublin County Council offices. (SD-C292-CAP-21)</li> <li>• Councillor Derren Ó Brádaigh requests SDCC to work in partnership with the Local Enterprise Office, to offer Climate Care mentoring,</li> </ul>	<p><b>CE Response</b> As outlined in the Community Engagement Section of the Draft Plan, engaging citizens and businesses on climate change, is one of the Council's key action areas.</p> <p>Action CE14 of the Draft Plan relates to strengthening existing networks and create new</p>

	<p>training, and funding incentives and schemes for SME's that demonstrate Climate change mitigation initiatives. (SD-C292-CAP-10)</p> <ul style="list-style-type: none"> <li>• SDCC Green Party Councillors request specific plans and targets for the establishment and support of social enterprises that are involved in the circular economy. (SD-C292-CAP-22)</li> </ul>	<p>climate change links to encourage businesses to engage with climate action.</p> <p>The Council's Local Enterprise Office (LEO) offers supports to encourage wider engagement by local businesses and entrepreneurs, in the green transition. SDCC and LEO are committed to maximise the effectiveness of communications through events, workshops and direct engagement and also work in collaboration with South Dublin Chamber, in this regard.</p> <p>The LEO has and will continue to work in partnership with SDCC to offer support from a panel of specialist mentors, trainers in Climate Change and LEO funding incentives will be available to business, who meet LEO eligibility criteria.</p> <p>SDCC will include specific plans and targets for social enterprises in the forthcoming Local Economic and Community Plan (LECP), which is in development.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Water Pollution</p>	<ul style="list-style-type: none"> <li>• Local Authority Waters Programme request SDCC include a review of all Section 4 discharge licenses to take account of the changing river flows both high and low and the changing assimilative capacity due to the weather patterns associated with our changing climate. Perhaps it could be included in N17 or R13, below is some</li> </ul>	<p><b>CE Response</b></p> <p>The national Section 4 database was developed in 2015, as a joint undertaking between the Environmental Protection Agency (EPA) and local authorities (LAs), to capture information on the location of Section 4 licence discharges,</p>

	<p>suggested wording.</p> <p>"Carry out a review of Section 4 Discharges to Water licences to determine if they are fit for purpose to meet projected climate change related risks such as hydrological changes and water temperature increases." (SD-C292-CAP-6)</p>	<p>throughout the country. The information is used by EPA, LAs and other users of the Water Framework Directive App, within the EPA EDEN system, to characterise the pressures impacting on waters.</p> <p>Initiated by the EPA in Q4 2023, a review commenced of the current and historic Section 4 Licences by all local authorities, including SDCC. Arising from this review, an Implementation Plan will be rolled out by all local authorities in conjunction with the Local Authority Waters Programme (LAWPRO) network.</p> <p>Following the outcome of the review, SDCC will ensure all Section 4 Licences are fit for purpose, taking account the changing environment. As such, this matter is outside the scope of the Draft Plan.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Water Management</p>	<ul style="list-style-type: none"> <li>Uisce Éireann request that water demand management (by households, businesses &amp; schools etc) be included in the climate action plan. Water efficiency should mirror existing efforts related to energy and incorporate but not be limited to reduction in demand, water reuse and location of industry in suitable locals to facilitate process water reuse from one industry to another. (SD-C292-CAP-4)</li> </ul>	<p><b>CE Response</b></p> <p>Uisce Éireann (UÉ) is responsible for public water services in Ireland. This extends to all public water services, involving the supply of drinking water and the collection, treatment and disposal of wastewater. SDCC acknowledges the importance of water as a valuable resource and the importance of its efficiency of use.</p> <p>Within the County Development Plan 2022-28, policies have been adopted taking account of the</p>

		<p>Regional Spatial and Economic Strategy (RSES), the National Planning Framework, the Water Services Policy Statement 2018-2025 (2018) and the Water Services Strategic Plan (2015) (WSSP).</p> <p>It is noted that the County Development Plan 2022-28 includes an objective to promote water conservation and best practice water conservation in all developments, including rainwater harvesting, grey water recycling and supporting the implementation of BS8515:2009 Rainwater harvesting systems – Code of practice. Specific to water supply, the County Development Plan provides for the continued work with UÉ to reduce leakage in accordance with any forthcoming Regional Water Conservation Strategy.</p> <p>At all times through the planning process, SDCC works to promote water conservation and best practice water conservation in all developments, including rainwater harvesting, grey water recycling and supporting the implementation of BS8515:2009 Rainwater harvesting systems – Code of practice Regional Water Conservation Strategy.</p> <p>Whilst responsibility for water demand management is within the remit of Uisce Éireann, the Draft Plan includes several actions which highlight how to engage citizens and key external partners to promote behaviour change. For example, Action CE4 relates to using targeted campaigns to increase knowledge of climate</p>
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		<p>issues, for example, World Water Day, Reuse Month, National Food Waste Recycling Week, etc.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Green Procurement</p>	<ul style="list-style-type: none"> <li>SDCC Green Party Councillors suggest that green procurement policies are applied throughout the food service and catering procurement. (SD-C292-CAP-22)</li> </ul>	<p><b>CE Response</b> SDCC is committed to the principles of Green Public Procurement in all its activities and it encourages the implementation of sustainability principles in all its procurement practices.</p> <p>The inclusion of cross cutting governance actions in the Draft Plan, one of which addresses Green Procurement, highlights the need for the continuation of climate action mainstreaming across the Council's service delivery.</p> <p>For example, Action GOV2 in each of the Draft Plan thematic sections relates to ensuring Green Public Procurement (GPP) implementation in all SDCC tenders as part of the scored quality assessment, in order to source goods, services and works with a reduced climate and environmental impact and to provide relevant GPP training for staff.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Renewable Energy and Alternative Energy Sources</p>	<ul style="list-style-type: none"> <li>Gas Networks Ireland highlight the potential for both biomethane and green hydrogen in South Dublin, whether through their use in the local economy or their production using local feedstock (municipal and agricultural waste for biomethane and renewable</li> </ul>	<p><b>CE Response</b> As outlined in the Energy and Buildings section of the Draft Plan, identifying alternative energy sources and increasing SDCC's renewable energy</p>

	<p>electricity from solar and offshore wind power generation for green hydrogen) - Gas Networks Ireland suggest that the new South Dublin County Council's Climate Action Plan references both. (SD-C292-CAP-16)</p> <ul style="list-style-type: none"> <li>• HSE encourage the exploration of innovative solutions to waste management, for example, the use of biomethane (a by-product of food waste) as a source of energy. (SD-C292-CAP-19)</li> </ul>	<p>generation capacity, are key Council priorities. Several actions are included in the Draft CAP (E14 – E20), which examine organisational energy management and innovation.</p> <p>Policy objectives on other renewable energy development proposals, including solar energy and onshore wind, are included in the County Development Plan 2022-28.</p> <p>SDCC will work with Gas Networks Ireland and other stakeholders in identifying the role of green hydrogen and biomethane, in achieving climate and emission reduction targets to 2030 and 2050.</p> <p>The Council is committed to evolving its waste management practices, in alignment with sustainability standards, as relevant. Council policies reflect the guidelines outlined in the National Waste Management Plan for a Circular Economy (Action R7 of the Draft Plan). The National Waste Management Plan includes over 200 measures across various waste areas, including the circular economy, municipal waste, consumer protection / citizen engagement, plastics and packaging, construction and demolition, textiles, green public procurement and waste enforcement.</p> <p>With regard to innovative solutions to waste management, Action R4 of the Draft Plan relates to investigating sustainable solutions to the management of grass cuttings and to deliver</p>
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		<p>appropriate solutions identified. The Council is also currently studying the feasibility of using grass cuttings as a feedstock in an Anaerobic Digestion (AD) facility. The feasibility study will also consider the potential use of biogas, a by-product of the AD process, as a sustainable fuel source for SDCC vehicles.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Reuse &amp; Repair</p>	<ul style="list-style-type: none"> <li>• Ciaran Cuffe MEP suggests the promotion of repair cafes are an excellent way to introduce more sustainable lifestyle choices and involve local people in the process. Local communities would benefit from a set monthly day where they can access services provided by repair cafes, for example the first Sunday of every month. (SD-C292-CAP-21)</li> <li>• SDCC Green Party Councillors suggest Council owned facilities display best practice resource management to enable reuse/repair and recycle principles. (SD-C292-CAP-22)</li> </ul>	<p><b>CE Response</b> The Draft CAP identifies the need to transition away from the current unsustainable linear system to a circular one which puts, reuse, repair and recycling above disposal.</p> <p>Enabling reuse, repair, and recycling principles is essential for enabling community resilience. SDCC is dedicated to partnering with local stakeholders, businesses and residents to raise awareness and advocate sustainable practices. The Council promotes and supports repair cafés as part of its wider environmental awareness raising programme.</p> <p>Through collaborative efforts, including workshops and partnerships, SDCC aims to set specific goals within Council-owned facilities. These goals will focus on waste reduction and establishing a culture that moves towards a more circular economy, incorporating reuse, repair, and recycling. The Council will actively monitor and</p>

		<p>evaluate the progress of these initiatives, ensuring alignment with national guidelines for best practice resource management. Educational campaigns will play a pivotal role in promoting responsible consumption, with SDCC closely aligning with and contributing to national education and awareness initiatives.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Waste</p>	<ul style="list-style-type: none"> <li>• Irish Green Building Council suggests the Circular Economy section should focus more on construction and demolition (C&amp;D) waste. The construction industry is extremely resource intensive, with 50% of all minerals extracted in the world used in this sector. C&amp;D waste is Irelands largest waste stream, and this number is only going to increase due to the large amount of construction projects planned, especially under the Ireland 2040 plan. (SD-C292-CAP-3)</li> <li>• HSE suggest promoting recycling/reuse initiatives to local businesses, including encouraging supermarkets and restaurants to reduce food waste, especially via initiatives that have co-benefits on alleviating food poverty. Organic food waste bins should be made available to everyone in South Dublin. Waste companies operating in the area should disincentivise use of the black bin (waste going to landfill) wherever possible. (SD-C292-CAP-19)</li> <li>• HSE highlight the need of local authorities to recycle materials such as clothing. This should be extended to rags with dedicated efforts to textile recycling to reduce landfill use. (SD-C292-CAP-19)</li> <li>• Councillor Derren Ó Brádaigh requests SDCC provide funding to conduct research that would support the development of a new roadmap for waste management in the county. A sub-committee of the Environment, Public Realm and Climate Change could be</li> </ul>	<p><b>CE Response</b> The Draft CAP identifies the need to transition away from the current unsustainable linear system to a circular one which puts, reuse, repair and recycling above disposal.</p> <p>SDCC aims to identify opportunities to reduce resources across all departments, including investigating opportunities to reduce construction and demolition (C&amp;D) waste in Council projects. Action R3 in the Draft Plan relates to identifying opportunities to reduce Construction &amp; Demolition (C&amp;D) waste generated by SDCC and liaise with relevant organisations collaboratively.</p> <p>Action T24 of the Draft CAP relates to road construction projects, minimising the use of virgin materials and promote the use of reclaimed asphalt pavement (RAP) or low carbon alternatives. The inclusion of cross cutting governance actions in the Draft Plan, including GOV3 in the Circular Economy &amp; Resource</p>

	<p>established to commission and oversee this research. (SD-C292-CAP-10)</p> <ul style="list-style-type: none"> <li>• SDCC Green Party Councillors suggest a target should be set to ban these items (plastic waste bottles, beverage cups etc.) from all council owned buildings and commence a campaign for retailers to vastly reduce and eliminate harmful unnecessary single use products. There should be a roadmap to phase out use of acrylic paints and other harmful products, including Glyphosate, over the period of the action plan. That food waste reduction strategies are applied through monitoring and reporting on food waste throughout catering and food service in all council run buildings. Aim to eliminate all single use plastic beverage bottles and single use beverage cups from all council premises and campaign to reduce and eliminate from retail outlets. Should include specific targets for: Waste reduction, re-use and recycling Food waste targets for both domestic and commercial Public recycling infrastructure including commercial and domestic food waste. Support community activities to reduce waste Increase the numbers of on street recycling bins Include in planning conditions for retail development glass and recycling facilities. (SD-C292-CAP-22)</li> <li>• Christopher Conway highlights SDCC very recently had an open day from 9am to 12.30 in the car park of their HQ in Tallaght. This was advertised in the Echo and the free local area papers. The public could bring a wide range of waste and used items i.e. electrical, paints, mattresses, herbicides, pesticides, waste engine and cooking oils and dispose of all of these safely and at no cost to themselves. This should be done at least twice yearly and from the time of 9 or 10am until 3 or 4pm. The bulky waste collections that were done in the past should also be recommenced. (SD-C292-CAP-31)</li> <li>• Ciaran Cuffe MEP suggests the institutionalisation of free electrical recycling days would also be a welcome addition to this 2024-2029 CAP, perhaps once annually. (SD-C292-CAP-21)</li> </ul>	<p>Management Action section, which requires all new SDCC Projects to be assessed for the feasibility of incorporating climate actions and measures.</p> <p>Action R7 of the Draft CAP relates to supporting and promoting the implementation of the targets of the National Waste Management Plan for a Circular Economy. Recent changes in legislation means that from January 2024, every household is entitled to a food waste collection service.</p> <p>The National Waste Management Plan for a Circular Economy identifies textiles as a focus area. Separate collection obligations will be extended to include textiles by the end 2024. Any progress made in this regard will be reported under Action R7 of the Draft CAP, to support and promote the implementation of the targets of the National Waste Management Plan for a Circular Economy.</p> <p>The Draft CAP outlines the importance of managing waste in SDCC and the need to adopt a circular economy. The new National Waste Management Plan for a Circular Economy sets out the policy base for the effective management of waste to ensure that the generation, collection and treatment of materials is optimised to enable reuse, repair, recycling and circularity.</p> <p>The Environment, Public Realm and Climate Change Strategic Policy Committee advises and assists the Council in the formulation,</p>
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		<p>development and review of climate and environmental policy. The Council's Climate Team regularly updates the SPC on CAP progress and on the progress of different climate action projects, including waste policy and programmes.</p> <p>SDCC has carried out annual mattress amnesties for the past number of years, allowing the public to dispose of their used mattresses in an environmentally sustainable way. These amnesties are carried out at various locations throughout the County and are advertised in advance through local newsprint and social media.</p> <p>In the last number of years, the Council has undertaken a free Waste Electrical and Electronic Equipment (WEEE) collection service, with seven collection days undertaken in 2023. WEEE is managed by a national compliance scheme which SDCC supports. Furthermore, SDCC supports Recycle IT, a social enterprise based in Clondalkin, which offers recycling drop off and collection services for homes and organisations across Dublin and surrounding areas.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
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#### 4.12 Submissions on Section 5 Community Engagement

Issue	Issue Summary	CE Response and Recommendation
Human Resources	<ul style="list-style-type: none"> <li>Four Districts Woodland Habitats Group welcomed that a Climate Team has been established but suspect that a larger team is needed particularly for Community engagement and to achieve targets. (SD-C292-CAP-27)</li> <li>SDCC Green Party Councillors submission noted that resources should be allocated for additional staff to engage with communities. Community officers (such as biodiversity officers) would liaise with resident's associations and other local organisations to encourage the development of wildflower areas, pocket forests, waste free areas and provide assistance for these groups to make submissions for funding to the community climate action fund. (SD-C292-CAP-22)</li> </ul>	<p><b>CE Response</b></p> <p>Within the Environment, Water and Climate Change department, SDCC has an established Climate Action Team, who work across all Council departments, to mainstream climate action, deliver specific projects, support and monitor the implementation of climate actions and coordinate the reporting and evaluation of the existing Climate Action Plan.</p> <p>The Climate Action Team is further supported by six Climate Action Teams, established to manage and deliver the Council's ongoing climate actions. This cross-departmental programme is overseen by a Climate Action Steering Group. These teams mirror the thematic areas of the existing Climate Action Plan. In 2024, an additional Climate Action Team will be established to facilitate the Clondalkin Decarbonising Zone Implementation Plan.</p> <p>Embedding climate action within all Council directorates is a strategic goal of the Community Engagement Action area of the Draft Plan. Action CE17 relates to providing Climate Awareness training for all staff and elected members and identify opportunities to embed climate awareness across all departments. This training programme is led by the Climate Action Regional Offices (CARO) in partnership with a range of other organisations.</p>

		<p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Public Engagement</p>	<ul style="list-style-type: none"> <li>• Four Districts Woodland Habitats Group submission notes the public consultation in the Clondalkin Civic Offices was excellent. More consultations were needed and more embedded in the communities. Meeting people is the most effective way of communicating. (SD-C292-CAP-27)</li> <li>• Community Gardens Ireland request South Dublin County Council to recognise National Allotments and Community Gardens Week by celebrating the role of community growing within communities throughout South Dublin County Council during this week each year. (SD-C292-CAP-13)</li> <li>• The Irish Green Building Council suggest using libraries as climate hubs (CE6) makes perfect sense, but the council could go one step further and use one of these libraries as a physical one-stop-shop to support people with energy renovation works and funding application as it has been done in Cork City. (SD-C292-CAP-3)</li> <li>• SDCC Green Party Councillors suggest that community engagement process with workshops, focus groups, going forward, to keep citizens updated and allow feedback on implementation of the Climate Action Plan. (SD-C292-CAP-22)</li> <li>• Not Here Not Anywhere suggest special outreach efforts must be made to include disadvantaged or marginalised groups in participatory processes. Those running participatory processes should keep a detailed record of the participation of marginalised groups and of best practices that serve to increase this participation. (SDCC-C292-CAP-15)</li> <li>• Woodview Heights Residents Association welcome the objective of community engagement and would like to propose deeper engagement with Residents Associations (very localised level) for the exploration of community behaviours on meeting climate targets. (SD-C292-CAP-26)</li> <li>• HSE suggest engagement with healthcare as one of the external organisations. Primary Care centres and general practice surgeries have</li> </ul>	<p><b>CE Response</b></p> <p>The inclusion of a specific Community Engagement Action area in the Draft Plan, demonstrates the Council's commitment to engage and support citizens and stakeholders to deliver effective, informed climate action at the local level, across South Dublin County.</p> <p>Furthermore, the Council has an established track record in delivering awareness programmes on a variety of climate and environmental issues to inform, empower and support communities, citizens and businesses across South Dublin County to take meaningful climate action.</p> <p>Several related climate actions are included in the Draft Plan. Action CE3 relates to engaging with communities and businesses across South Dublin through workshops / presentations, to increase understanding of climate change. Action CE6 relates to identifying opportunities to utilise libraries in South Dublin as climate hubs.</p> <p>The important role of community allotments and gardens is recognised, with specific regard to local food production. SDCC acknowledges the importance of highlighting public awareness initiatives such as national Allotments and Community Gardens Week in communications</p>

	<p>the potential to foster health-related climate action. Healthcare facilities can be a source of climate education and a point of engagement with communities, as well as providing an opportunity for social and green prescribing for the practice. (SD-C292-CAP-19)</p> <ul style="list-style-type: none"> <li>• HSE suggests including processes on transparent feedback to the community on progress made [of the CAP] and outcomes achieved. This has the potential to foster further engagement. (SD-C292-CAP-19)</li> <li>• HSE recommends that the ambition in Community Engagement go beyond awareness raising but extend to changes in behaviour and sustainability of behaviour among stakeholders including businesses and communities. Progress can only be measured by assessing not only knowledge but practice. The EHS expresses the wish that the HSE is viewed as an external partner for all aspects of this plan in addition to Emergency Management. Perhaps Residents Associations can also be viewed at partners on a more micro level. (SD-C292-CAP-30)</li> <li>• Neighbourhood Network support integration of climate action into existing community events, such as the annual event of Street Feast, would be an ideal opportunity to show action in situ. There are hundreds of Street Feast groups, who run informal community gatherings. These community groups present a very real, yet informal, opportunity to bring the message of action into the heart of many communities. (SD-C292-CAP-23)</li> <li>• Councillor Derren Ó Brádaigh suggests all future Climate Care initiatives and consultations must engage and encourage feedback from national, secondary and universities to better inform plans. (SD-C292-CAP-10)</li> </ul>	<p>campaigns. This matter is dealt with elsewhere in this report.</p> <p>The Council also uses a range of communication tools to inform the public on climate action issues. Regular articles in the Chief Executives Report, SDCC citizen newsletter and SDCC Climate Newsletter, help keep the public up to date on progress of the existing Climate Action Plan. Similarly, the South Dublin Climate Action website, <a href="http://www.southdublinclimate.ie">www.southdublinclimate.ie</a>, provides regular updates on actions and general climate and environmental news.</p> <p>The Draft Plan was on public consultation from 20<sup>th</sup> September to 3<sup>rd</sup> November 2023. The publication of the Draft CAP was publicised via several channels including local papers, radio and SDCC social media channels. The Climate Action Team wrote directly to all secondary schools and Technological University Dublin, to inform them of the publication of the draft plan and the public consultation period.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Influencing and Advocating</p>	<ul style="list-style-type: none"> <li>• The Environmental Protection Agency suggest taking into account the EPA's 'Climate Change in the Irish Mind' project in finalising the Plan. This research is part of the National Dialogue on Climate Action. (SD-C292-CAP-5)</li> <li>• SDCC Green Party Councillors request more details on specific behaviour change plans for the lifetime of the plan. (SD-C292-CAP-22)</li> </ul>	<p><b>CE Response</b></p> <p>The Draft Plan sets out how the Council is responsible for enhancing climate resilience, increasing energy efficiency and reducing greenhouse gas emissions, across its own assets, services and infrastructure, to which it is 'fully</p>

	<ul style="list-style-type: none"> <li>• Ciaran Cuffe MEP suggests the need to introduce local initiatives to tackle high levels of climate anxiety in young people, the most important of which is a bottom-up approach to climate action at local level. One way that SDCC could implement this would be by introducing a Climate Ambassador scheme, wherein locals who have undergone climate renovations in their homes would be connected with other members of the community to talk about the process from a non-expert perspective. (SD-C292-CAP-21)</li> <li>• Councillor Derren Ó Brádaigh refers to motion no. 3 – Meeting of Development Plan 2022 – 2028 (01/03/22) (submitted by Sinn Féin Councillors Derren Ó Brádaigh and William Carey); “As agreed, an evidence-based analysis of employment lands, including the potential for Agri-hub employment, will be undertaken in 2024 (as part of the two-year statutory review of the Plan) and to consider a variation to the plan toward the development and delivery of such a standalone Agri/Commercial hub at a proposed site off Colmanstown Lane” (SD-C292-CAP-10)</li> <li>• Councillor Derren Ó Brádaigh suggests developing a local Community Wealth Building model with key local anchor businesses, large service providers, hospitals and the HSE etc - submit a strategic ‘community business plan’ outlining the merits whilst pressing for the necessary funding from central Government. (SD-C292-CAP-10)</li> <li>• Councillor Derren Ó Brádaigh suggests establishing a localised ‘Just Transition’ sub-committee working group of the Environment, Public Realm and Climate Change Special Policy Committee (SPC). Overarching national climate change policies are in some instances dictating poorly planned climate action measures resulting in reduced standards of living. This sets us back in our wider objectives to reduce emissions by drawing negative public buy-in. Transition needs to make tangible improvements to people’s lives if it is to garner public support (SD-C292-CAP-10)</li> </ul>	<p>accountable’ for, whilst also demonstrating a broader role of ‘influencing’, ‘coordinating and facilitating’ and ‘advocating’ other sectors, to meet their own climate targets and ambitions. This is necessary to ensure that the environmental, social and economic benefits that come with climate action, can be fully realised.</p> <p>This overall approach to the Draft Plan is in accordance with the Local Authority Climate Action Plan Guidelines, as published by the Department of the Environment, Climate and Communications.</p> <p>The inclusion of a specific Community Engagement Action area in the Draft Plan, demonstrates the Council’s commitment to engage and support citizens and stakeholders to deliver effective, informed climate action at the local level, across South Dublin County.</p> <p>Promoting and delivering initiatives and campaigns such as the Community Climate Action Programme, Sustainable Energy Communities, Dublin Climate Action Week, Home Energy Savings Kits and others, will assist in highlighting the need for climate action across local communities and wider society.</p> <p>Recognising the need to work with young people is specifically accounted for in Action CE1 of the Draft Plan, which relates to delivering climate education programme for primary and secondary schools.</p>
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		<p>With regard to Climate Change in the Irish Mind, this forms part of the National Dialogue on Climate Action. The Council continues to support this national programme and engages with the Public Participation Network and Comhairle na nÓg on climate action.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Communicating Climate Action</p>	<ul style="list-style-type: none"> <li>• SDCC Green Party Councillors suggested developing a community sector online dashboard to map and quantify the community role in climate action, to build collaboration, education, networks of climate actions and build capacity in the community. (SD-C292-CAP-22)</li> <li>• Four Districts Woodland Habitat Group stated “Currently, it is not possible to easily find progress made in implementing the actions for the previous plan, presuming it is on the website.” (SD-C292-CAP-27)</li> <li>• Four Districts Woodland Habitat Group submission highlight the website would benefit from adding more to the drop-down menus across the different web pages to improve navigation. For instance, some “At Home” actions are listed but then “At Work” actions are not. Additional Actions could be to: Provide links to the relevant SPC reports and Council presentations Hold Virtual Workshops/Information dissemination in person Road shows Expanding the mailing list Offer presentations to community groups. (SD-C292-CAP-27)</li> </ul>	<p><b>CE Response</b> The inclusion of a specific Community Engagement Action area in the Draft Plan, demonstrates the Council’s commitment to engage and support citizens and stakeholders to deliver effective, informed climate action at the local level, across South Dublin County.</p> <p>The dedicated climate action website <a href="http://www.southdublinclimate.ie">www.southdublinclimate.ie</a>, provides updates on each of the actions in the current Climate Action Plan 2024-2029. The website will be continually updated with regard to the implementation of the Draft Plan.</p> <p>The Council also publishes a series of climate change newsletters, providing information to subscribers on progress on a variety of Council climate action projects and programmes.</p> <p>With regard to community energy projects, the Council launched the Community Climate Action Programme (CCAP) on December 13<sup>th</sup> 2023.</p>

		<p>Funding of €1.073m is available for local, not-for-profit community groups and organisations over an initial 18-month period to undertake local climate action projects.</p> <p>The overall objective of the Programme is to support and empower communities, in partnership with SDCC, to deliver projects that shape and build low carbon, sustainable communities in a considered and structured way to help contribute to national climate and energy targets.</p> <p>Communities can play a crucial role in driving such positive change. In conjunction with the Department of the Environment, Climate and Communications, SDCC will support this through the CCAP. Project sizes include small (up to €20,000), medium (€20,000 - €50,000) and large (€51,000 - €100,000).</p> <p><b>CE Recommendation</b> No Change to the Draft CAP.</p>
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#### 4.13 Submissions on Section 6 Decarbonising Zone

Issue	Issue Summary	CE Response and Recommendation
Buildings	<ul style="list-style-type: none"> <li>• People Before Profit has concerns that the actions needed, if not funded properly, will not be achievable. For example, if the retrofitting of buildings is left up to the owners or occupiers through the existing grant system that is unlikely to be successful. We need enhanced grants and incentives to get this work carried out. (SD-C292-CAP-17)</li> </ul>	<p><b>CE Response</b></p> <p>As stated in the Draft CAP, a Decarbonising Zone (DZ) is a chosen area where local authorities and communities work together, to reduce the amount of greenhouse gas emissions produced by daily activities. The main objective of the DZ is to find</p>

		<p>innovative and achievable ways to reduce emissions in the area, by 51% by 2030. SDCC has selected an area of Clondalkin in which to establish a DZ.</p> <p>The vision for the Clondalkin DZ is to ‘showcase the opportunities for decarbonisation and sustainable living in our County’.</p> <p>Regarding GHG emissions in the DZ, the residential sector accounts for 31% and the commercial sector accounts for 15%. The Draft CAP outlines a range of opportunities for these sectors, as part of the Register of Opportunities for the Clondalkin DZ. Using the Register of Opportunities as a basis, a DZ Implementation Plan will be developed in collaboration with Codema – Dublin’s Energy Agency and other stakeholders. The Council will continue to work with Codema, the Dublin Climate Action Regional Office and others, to identify funding and other supports available to develop the Clondalkin DZ.</p> <p>To work towards 2030 targets for the Council’s greenhouse gas emissions and energy usage, substantial funding is provided for, in the Council’s 2024 Budget, to expand the existing climate action programme.</p> <p>The Sustainable Energy Authority of Ireland (SEAI) work with householders, businesses, communities, and Government to create a cleaner energy future. The SEAI offers a range of grants to homeowners,</p>
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		<p>including help with insulation, heat pumps, solar panels, and technical advice. A 'one-stop-shop' service offers homeowners all the services required for a complete home energy upgrade. Grants are also available for one-off measures. The Council continues to implement the Government's Energy Efficiency Retrofitting Programme for social housing upgrades. The programme has an overall target of 36,500 social houses nationally to be upgraded to a BER rating of B2. The revised programme provides significant upscaling in the levels of funding available in line with the Programme for Government commitments.</p> <p>No specific 2030 target has been confirmed for each individual Local Authority; however, based on SDCC having approximately 7% of the national social housing stock, it is expected a minimum target of 2,500 Energy Retrofit Upgrades to properties will be required, by 2030.</p> <p>To date, the Council has availed of maximum levels of funding under the programme, within the parameters of annual Government funding allocations made available to SDCC for social housing retrofits. The Council continues to undertake a programme of stock condition surveys of the social housing stock, with the aim of increasing completion targets, subject to funding being made available by the Department of Housing, Local Government and Heritage.</p>
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<p>DZ Selection</p>	<ul style="list-style-type: none"> <li>• Thomas Weafer states a second decarbonising zone, based on the Tallaght Central local election area, should be included in the plan. The funding required to establish this second decarbonising zone should also be drawn down from the “second avenue of access” in the Infrastructure, Climate &amp; Nature Fund, as referred to above. (SD-C292-CAP-8)</li> </ul>	<p><b>CE Response</b> Action 165 of the Climate Action Plan 2019 states: Each local authority will identify and develop plans for one Decarbonising Zone.</p> <p>SDCC has selected an area of Clondalkin in which to establish a DZ. As stated in the Draft Plan, to qualify as Decarbonising Zones, the chosen areas need to have certain characteristics that have potential for climate action across a variety of sectors. Clondalkin was chosen as a Decarbonising Zone as it was considered; 1) to be ready to support climate action, 2) to have a strong sense of community, 3) to be the right size in terms of population (at least 5,000 people for urban decarbonising zones). The area chosen also has potential to expand existing and develop new projects, with opportunities to tackle a range of issues and co-benefits.</p> <p>Any further DZ designations in the County, would require Government input and consideration as part of the national Climate Action Plan and any relevant annual updates to same.</p> <p>The Council will continue to work with Codema, the Dublin Climate Action Regional Office and others, to identify funding and other supports available to develop the Clondalkin DZ, which could include for example, the Infrastructure,</p>

		<p>Climate &amp; Nature Fund, as relevant. The General Scheme for this fund was published by Government in October 2023.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Transport</p>	<ul style="list-style-type: none"> <li>• People Before Profit state the same is true [funding of climate actions] in relation to transport and since much of this is the responsibility of the NTA there needs to be additional resources allocated through the NTA and other bodies to carry this through. (SD-C292-CAP-17)</li> </ul>	<p><b>CE Response</b></p> <p>As stated in the Draft CAP, a Decarbonising Zone is a chosen area where local authorities and communities work together, to reduce the amount of greenhouse gas emissions produced by daily activities. The main objective of the DZ is to find innovative and achievable ways to reduce emissions in the area, by 51% by 2030. SDCC has selected an area of Clondalkin in which to establish DZ.</p> <p>The vision for the Clondalkin DZ is to 'showcase the opportunities for decarbonisation and sustainable living in our County'.</p> <p>Regarding GHG emissions in the DZ, the transport sector accounts for 49%. The Draft CAP outlines a range of opportunities for the transport sector, as part of the Register of Opportunities for the Clondalkin DZ. Using the Register of Opportunities as a basis, a DZ Implementation Plan will be developed in collaboration with Codema, the National Transport Authority, Transport Infrastructure Ireland and other stakeholders. The range of Active Travel actions contained in the Draft Plan will progress opportunities to make</p>

		<p>walking and cycling more attractive and viable and target reasons that people choose not to cycle, with the goal of making the County one of Ireland's most cycle friendly counties.</p> <p>The Active Travel actions contained in the Draft Plan, will also provide people of all ages and abilities with a well-connected, well designed and safe cycle network, that offers citizens a credible alternative to using the private car.</p> <p>The Cycle South Dublin Programme commenced in 2021, with significant progress made on a range of projects. The identification of additional schemes will be undertaken in collaboration with the National Transport Authority and other stakeholders, as relevant.</p> <p>The Council maintains an Active Travel website, <a href="https://www.sdcc.ie/en/active-travel/">https://www.sdcc.ie/en/active-travel/</a> which is updated regularly, to keep the public informed on project updates. This includes an interactive map of current and proposed projects across the County.</p> <p>The Council's Active Travel team will continue to liaise with internal and external stakeholders as projects are developed, to ensure the enhancement and safety of the public realm.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
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#### 4.14 Submissions on Section 7 Implementation and Reporting

Issue	Issue Summary	CE Response and Recommendation
Action Tables	<ul style="list-style-type: none"> <li>Four Districts Woodland Habitat Group state assignment of Action Type – Adaptation/Mitigation or Other? The primary objective of the Draft 2024-2029 CAP should be the reduction of GHGs i.e., mitigation. This can be achieved by promoting actions that reduce activities producing / resulting in GHG emissions e.g., reduction in petrol/diesel car use. But it can also be achieved through actions that remove GHGs e.g., planting of trees. It is important that actions are assigned appropriately as mitigation or adaptation or both. There are some actions that are neither but fall under public awareness. Actions under public awareness only become mitigation or adaptation action IF it leads to such an action being taken. (SD-C292-CAP-27)</li> </ul>	<p><b>CE Response</b></p> <p>The Draft Plan has been developed in accordance with the Local Authority Climate Action Plan Guidelines as published by the Department of the Environment, Climate and Communications.</p> <p>The range of actions included in the Draft CAP are based on the following targets:</p> <ul style="list-style-type: none"> <li>50% improvement in the Council’s energy efficiency by 2030;</li> <li>51% reduction in the Council’s greenhouse gas (GHG) emissions by 2030;</li> <li>To make Dublin a climate resilient region, by reducing the impacts of future climate change-related events; and</li> <li>To actively engage and inform our communities on climate action.</li> </ul> <p>The targets of the Draft Plan are framed by the Climate Action and Low Carbon Development (Amendment) Act 2021 and the national Climate Action Plan. The Plan includes a range of actions for which the Council is ‘Fully Accountable’. The Plan is also outward focused and includes a range of actions for which the Council can ‘Influence’, ‘Coordinate and Facilitate’ and ‘Advocate’ for other sectors, in meeting their own climate and energy targets, thereby reflecting the Government’s National Climate Objective and an</p>

		<p>all of society reduction in greenhouse gas emissions of 51% by 2030.</p> <p>Actions in the Draft Plan are identified as being either adaptation or mitigation related. It is noted that some actions address both and have co-benefits. For example, parks and open spaces have a role in carbon sequestration, but also have an important function in surface water attenuation and helping to reduce the impacts of the urban heat island affect.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Implementation</p>	<ul style="list-style-type: none"> <li>• John O’Leary states a much bigger priority and budget be given to the Climate Change team /Advisers/ Implementation teams at SDCC. (SD-C292-CAP-28)</li> <li>• SDCC Green Party Councillors state setting of specific actions, targets and timelines for all action points and regular reporting of progress. A specific timeline for the establishment of the Oversight Steering Group should be provided Collaboration with external agencies and stakeholders Include reference to a new annual climate budget and an annual Special Council Meeting on Climate Action. There needs to be a greater sense of urgency about the implementation and delivery of the key projects in the plan as we are a running out time. (SD-C292-CAP-22)</li> </ul>	<p><b>CE Response</b> The Draft Plan has been developed in accordance with the Local Authority Climate Action Plan Guidelines as published by the Department of the Environment, Climate and Communications.</p> <p>Section 7 relates to Implementation and Reporting. This includes accounting for the Council’s own energy performance under SEAI’s Monitoring and Reporting system and wider local authority sectoral reporting for example to the National Oversight and Audit Committee (NOAC) and to the Department of the Environment, Climate and Communications.</p> <p>Within the Environment, Water and Climate Change department, SDCC has an established Climate Action Team, who work across all Council</p>

		<p>departments, to mainstream climate action, deliver specific projects, support and monitor the implementation of climate actions and coordinate the reporting and evaluation of the existing Climate Action Plan.</p> <p>The Climate Action Team is further supported by six Climate Action Teams, established to manage and deliver the Council's ongoing climate actions. This cross-departmental programme is overseen by a Climate Action Steering Group. These teams mirror the thematic areas of the existing Climate Action Plan. In 2024, an additional Climate Action Team will be established to facilitate the Clondalkin Decarbonising Zone Implementation Plan.</p> <p>To assist in the delivery of targets for the Council's own greenhouse gas emissions and energy usage, substantial funding is being provided in the Council's 2024 Budget. The Council will continue to work with Codema, the Dublin Climate Action Regional Office and others, to identify funding and other supports available regarding the implementation of the Draft Plan.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
Monitoring	<ul style="list-style-type: none"> <li>Environmental Protection Agency (EPA) states Local Authorities need to ensure that there are sufficient suitable monitoring networks that are maintained and producing high quality data at an appropriate resolution and frequency, to allow decision makers to</li> </ul>	<p><b>CE Response</b> The Draft Plan has been developed in accordance with the Local Authority Climate Action Plan</p>

	<p>make decisions on how to adapt. This could be flood defence related, making arrangements with respect to water resources, bathing water or issuing health warnings relating to hot weather, air particulates etc. Consider including a commitment to ensure that monitoring arrangements remain fit for purpose, such that the data generated from monitoring, can be used by decision makers such as Local Authority emergency planning teams or Met Éireann flood forecasting teams. (SD-C292-CAP-5).</p> <ul style="list-style-type: none"> <li>EPA suggest that the Plan include a specific action to carry out “implementation monitoring” to ensure that progress achieving the actions and measures across the Plan is being monitored and reported on. (SD-C292-CAP-5).</li> </ul>	<p>Guidelines, as published by the Department of the Environment, Climate and Communications.</p> <p>Section 7 relates to Implementation and Reporting. This includes accounting for the Council’s own energy performance under SEAI’s Monitoring and Reporting system and wider local authority sectoral reporting for example to the National Oversight and Audit Committee (NOAC) and to the Department of the Environment, Climate and Communications.</p> <p>With regard to data for decision makers, the Draft Plan includes a detailed Climate Change Risk Assessment and a countywide Emissions Profile. It is noted that a range of flood maps are available on the Office of Public Works (OPW) website <a href="http://www.floodinfo.ie">www.floodinfo.ie</a>. The Council also has regard to weather warnings and the range of other data available from Met Eireann, the Sustainable Energy Authority of Ireland (SEAI) and others.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
<p>Reporting</p>	<ul style="list-style-type: none"> <li>Four Districts Woodland Habitat Group state some of the actions are more [or] less as per the previous plan. For example, 2019-2023 CAP, N12 is the same as the N6 in the current Draft CAP. This would suggest that there is carry over but some may be a continuation. Actions that are a carry over or are a continuation from the previous plan should be distinguished from new actions. A review or reflection of progress needs to be carried out periodically to identify what else can be done to achieve the actions set out. Tracking</li> </ul>	<p><b>CE Response</b> The Draft Plan has been developed in accordance with the Local Authority Climate Action Plan Guidelines as published by the Department of the Environment, Climate and Communications. Section 7 relates to Implementation and Reporting.</p>

	<p>Measures need to be measurable targets that lead to measurable outcomes of reduction in GHG emissions. What are the target numbers /quantification for the tracking measures? (SD-C292-CAP-27).</p> <ul style="list-style-type: none"> <li>• SDCC Green Party Councillors state a materiality assessment should take place as part of the final action plan. An independent assurance statement should be included in an annual review report. Include a report in SDCC annual draft budget, with a costing for each climate action item – indicate funding sources on all target items and target items that do not have funding. (SD-C292-CAP-22)</li> <li>• The HSE National Office for Environmental Health Services recommends “the comply or explain” approach for all sections and staff in SDCC. In the context of accountability and reporting the EHS recommends some degree of focus on capturing learning including learning from failure and suggest the inclusion of evaluation such as mid-term and end of term evaluation for the period of this climate action plan. Perhaps each of the four local authorities can conduct a peer led evaluation of each other? The HSE further recommends that performance is measured against the plans contribution to delivering on the Healthy Ireland Framework. (SD-C292-CAP-19)</li> </ul>	<p>As the Draft Plan is a statutory Plan under the Climate (Amendment) Act 2021, it must stand alone from the Council’s previous Climate Action Plan 2019-2024. As such, some actions in the Draft Plan reflect the thematic areas and actions included in the existing Plan.</p> <p>The monitoring and reporting on the Draft Plan will account for the Council’s own energy performance under SEAI’s Monitoring and Reporting system and wider local authority sectoral reporting for example to the National Oversight and Audit Committee (NOAC) and to the Department of the Environment, Climate and Communications.</p> <p>Within the Environment, Water and Climate Change department, SDCC has an established Climate Action Team, who work across all Council departments, to mainstream climate action, deliver specific projects, support and monitor the implementation of climate actions and coordinate the reporting and evaluation of the existing Climate Action Plan.</p> <p>The Climate Action Team is further supported by six Climate Action Teams, established to manage and deliver the Council’s ongoing climate actions. This cross-departmental programme is overseen by a Climate Action Steering Group. These teams mirror the thematic areas of the existing Climate Action Plan. In 2024, an additional Climate Action Team will be established to facilitate the</p>
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		<p>Clondalkin Decarbonising Zone Implementation Plan.</p> <p>To assist in the delivery of targets for the Council's own greenhouse gas emissions and energy usage, substantial funding is being provided in the Council's 2024 Budget.</p> <p>The Council will continue to work with Codema, the Dublin Climate Action Regional Office and others, to identify funding and other supports available regarding the implementation of the Draft Plan.</p> <p>The range of actions included in the Draft CAP are based on the following targets:</p> <ul style="list-style-type: none"> <li>• 50% improvement in the Council's energy efficiency by 2030;</li> <li>• 51% reduction in the Council's greenhouse gas (GHG) emissions by 2030;</li> <li>• To make Dublin a climate resilient region, by reducing the impacts of future climate change-related events; and</li> <li>• To actively engage and inform our communities on climate action.</li> </ul> <p>The targets of the Draft Plan are framed by the Climate Action and Low Carbon Development (Amendment) Act 2021 and the national Climate Action Plan.</p> <p>Actions in the Draft Plan are identified as being either adaptation or mitigation related. It is noted</p>
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		<p>that some actions address both and have co-benefits, which includes improved health and well-being. For example, parks and open spaces have a role in carbon sequestration, but also have an important function in surface water attenuation and helping to reduce the impacts of the urban heat island affect.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan.</p>
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#### 4.15 Submissions on Strategic Environmental Assessment (SEA) & Appropriate Assessment (AA)

Submission	Issue Summary	CE Response and Recommendation
<p>Sea Fisheries Coordination (Department of Agriculture, Food and the Marine)</p>	<ul style="list-style-type: none"> <li>• The seafood industry, through both the Sectoral Adaptation Plan (Agriculture, Forest and Seafood Climate Change Sectoral Adaptation Plan) and the annual Climate Action Plan (CAP23) continue to support initiatives to improve understanding of our marine area and ensure sustainable resource use, including through bio and circular economy initiatives. These plans require consideration in the SEA process. (SD-C292-CAP-18)</li> <li>• Sea Fisheries (DAFM) state Local Authorities should include relevant steps to support a Just Transition for the sea fisheries and aquaculture sectors in their Climate Action Plans. (SD-C292-CAP-18)</li> <li>• Also for consideration in the SEA process is the European Commission's Communication on the energy transition of the fisheries and aquaculture sector as part of its Fisheries Policy Package. This proposes the establishment of an Energy Transition Partnership (ETP) to develop a roadmap for the energy transition of the sector towards climate neutrality by 2050. (SD-C292-CAP-18)</li> </ul>	<p><b>CE Response</b> The submission from Sea Fisheries Coordination (Department of Agriculture, Food and the Marine) is noted.</p> <p>Local authorities in Ireland do not have a direct remit over the fisheries and aquaculture sector. The actions included in the Draft Plan are, however, aligned with the vision and measures defined in the European Commission's communications on the energy transition of the fisheries and aquaculture sector.</p> <p>Whilst not having a direct coastline and insofar as SDCC's remit extends, the Draft Plan supports the protection and enhancement of the marine environment. The actions included in the Draft</p>

		<p>Plan have the potential to generate multiple climate action benefits, co-benefits for the water and biodiversity environments and by extension the marine environment (i.e. biodiversity conservation and enhancement, coastal protection, water quality protection and improvements etc.).</p> <p>With regard to the energy transition of the fisheries and aquaculture sector, it is noted that amendments should be made to the SEA and AA reports.</p> <p><b>CE Recommendation</b>  <b>AA Natura Impact Report - Text to be added referring to communication on the energy transition of the fisheries and aquaculture sector in Section 3.4 - In-combination effects with Other Plans and Programmes, and Appendix 2 - Relationship with other plans and programmes, as appropriate.</b></p> <p><b>SEA Environmental Report – Text to be added referring to communication on the energy transition of the fisheries and aquaculture sector in Section 7.3 - Potential Cumulative Effect of the Draft LACAP in combination with other Plans and Projects, and Appendix 1 - Relationship of the Plan with other relevant Plans and Programmes, as appropriate.</b></p>
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<p>Environmental Protection Agency (EPA)</p>	<ul style="list-style-type: none"> <li>• 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. You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process. (SD-C292-CAP-5)</li> <li>• SEA Environmental Report - You should ensure that the Non-Technical Summary includes the relevant information as required under Schedule 2 of S.I No. 435 Of 2004, as amended. (SD-C292-CAP-5)</li> <li>• The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities. (SD-C292-CAP-5)</li> </ul>	<p><b>CE Response</b></p> <p>The submission from the Environmental Protection Agency is noted.</p> <p>The SEA Environmental Report to be amended to refer to the relevant information, as required under Schedule 2 of SI No 435 of 2004 as amended.</p> <p>The SEA Monitoring Programme established for the Draft CAP is contained in the SEA ER. This monitoring programme has been developed in accordance with EPA guidelines entitled 'Guidance on SEA Statements and Monitoring' (2020). The monitoring programme is multi-faceted, broad in scope and has been designed to allow for a flexible and adaptive approach to SEA monitoring during Plan implementation.</p> <p>It is noted that additional opportunities exist in relation to monitoring the positive environmental effects of defined climate action – in connection with SEOs PHH1, L1, AQN2, TR1. The SEA monitoring programme will be updated to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects arising due to plan implementation. Relevant text should be added to the SEA Environmental Report.</p> <p>The monitoring programme includes detail on the indicators, targets and data sources to be used to monitor and measure progress. A commitment to remedial action in the event SEA monitoring</p>
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		<p>shows the implementation of the Plan is having adverse environmental effects has been made in the SEA.</p> <p><b>CE Recommendation</b>  <b>SEA Environmental Report - to be amended to refer to the relevant information, as required under Schedule 2 of SI No 435 of 2004 as amended.</b></p> <p><b>SEA Environmental Report – text to be added updating the SEA monitoring programme to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects arising due to plan implementation. Provide additional detail on monitoring programme data sources.</b></p>
<p>Department of Housing, Local Government and Heritage</p>	<ul style="list-style-type: none"> <li>The Department previously made a submission in relation to the scoping of the SEA for the South Dublin County Council Climate Action Plan. In this submission corrections were suggested with regards to factual errors concerning the occurrence of protected plant species and the presence of a national park in the South Dublin County Council administrative area contained in Table 3.1 'Designated Ecological sites and Protected Species' in Section 3.3 Biodiversity, Flora and Fauna of the scoping report. It is noted that these factual errors have not been corrected in the corresponding Table 4.1 'Designated Ecological sites and Protected Species' in Section 4.3 Biodiversity, Flora &amp; Fauna of the SEA Report prepared in relation to the Draft Climate Action Plan. It is therefore recommended that Table 4.1 in the SEA Environmental Report should be modified to incorporate the corrections with regards to the occurrence of protected plant species and the presence of a national park in South Dublin suggested in the Department's</li> </ul>	<p><b>CE Response</b>  The submission from the Department of Housing, Local Government and Heritage is noted.</p> <p>The SEA Environmental Report and AA Natura Impact Report to be updated to correct any errors concerning the occurrence of protected plant species and the presence of a national park in the South Dublin County Council administrative area.</p> <p>The SEA Environmental Report and AA Natura Impact Report to be updated to reflect the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage Sector.</p>

	<p>submission on the SEA scoping for the Climate Action Plan. (SD-C292-CAP-11)</p> <ul style="list-style-type: none"> <li>The Department draws attention to the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) prepared as part of the National Adaptation Framework. The Climate Change Sectoral Adaptation Plan (CCSAP) identifies the priority impacts for the built and archaeological heritage based on current climate change projections. (SD-C292-CAP-11)</li> </ul>	<p><b>CE Recommendation</b></p> <p><b>AA Natura Impact Report – to be updated to correct any errors concerning the occurrence of protected plant species and the presence of a national park in the South Dublin County Council administrative area.</b></p> <p><b>SEA Environmental Report – to be updated to correct any errors concerning the occurrence of protected plant species and the presence of a national park in the South Dublin County Council administrative area.</b></p> <p><b>AA Natura Impact Report - to be updated to reflect the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) in Section 3.4 - In-combination effects with Other Plans and Programmes, and Appendix 2 - Relationship with other plans and programmes, as appropriate.</b></p> <p><b>SEA Environmental Report -to be updated to reflect the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) in Section 7.3 - Potential Cumulative Effect of the Draft LACAP in combination with other Plans and Projects, and Appendix 1 - Relationship of the Plan with other relevant Plans and Programmes, as appropriate.</b></p>
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#### 4.16 Summary of Chief Executive’s recommendations for Proposed Modifications

The following provides a list of non-material modifications which have been proposed by the Chief Executive, on foot of public consultation of the Draft Climate Action Plan. The proposed modifications are listed by the relevant Draft CAP section heading. All proposed modifications have been subject to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) screening. The list contained in this section is for ease of reference and should be read in conjunction with the full Chief Executive’s Report.

Draft CAP Section	Proposed Non-Material Modifications	SEA & AA Assessments
Energy & Buildings	<p>The following new action to be included in the Energy &amp; Buildings section of the Draft Plan:</p> <ul style="list-style-type: none"> <li>• <b>Maximise opportunities to avail of funding sources, to support a range of climate action projects across the County, including European Union (EU) funding streams.</b></li> </ul>	<p>SEA - This additional action is finance-related and will serve to underpin climate action, generally. It does not introduce additional environmental effects in and of itself.</p> <p>AA - This additional action is finance-related and will serve to underpin climate action, generally. It does not introduce additional environmental effects in and of itself.</p>
Community Engagement	<p>The following new action to be included in the Community Engagement section of the Draft Plan:</p> <ul style="list-style-type: none"> <li>• <b>Engage with communities and residents across the County, through local pop-up awareness raising events, on home energy upgrades, funding and other supports available.</b></li> </ul>	<p>SEA - This engagement-based action will support the reduction/offset of residential sector GHG emissions. It supports the aims and objectives of the LACAP through community engagement and awareness-raising. The action is only an engagement related action that will serve to underpin climate action generally. It does not introduce additional environmental effects in and of itself.</p> <p>AA – This engagement-based action will support the reduction/offset of residential sector GHG emissions. It supports the aims and objectives of the LACAP through community engagement and awareness-raising. The action is only an engagement related action that will serve to underpin climate action generally. It does not</p>

		introduce additional environmental effects in and off itself.
Nature Based Solutions	<p>The following new actions to be included in the Nature Based Solutions section of the Draft Plan:</p> <ul style="list-style-type: none"> <li>• <b>Maintain and expand allotments for local food production across the County, in accordance with SDCC's Allotments Policy.</b></li> <li>• <b>Support the provision of Community Gardens for local food production across the County, in partnership with Community Centres, Schools and other local groups.</b></li> </ul>	<p>SEA – These actions have the potential to increase the level of sustainable food production and have the potential to lead to a slight positive effect on the climate environment. The actions will be undertaken in accordance with the Environmental Governance Principles already defined in the Plan. The actions will be beneficial; however, it is in keeping with the environmental effects identified and considered under the SEA/AA process to date. There are no additional sources for likely, significant environmental effects.</p> <p>AA – These actions have the potential to increase the level of sustainable food production and have the potential to lead to a slight positive effect on the climate environment. The actions will be undertaken in accordance with the Environmental Governance Principles already defined in the Plan. The actions will be beneficial; however, it is in keeping with the environmental effects identified and considered under the SEA/AA process to date. There are no additional sources for effects; therefore, no further considerations are required in that regard.</p>
Strategic Environmental Assessment – Environmental Report	<p>The following amendments to the included:</p> <ul style="list-style-type: none"> <li>• <b>Text to be added referring to communication on the energy transition of the fisheries and aquaculture sector in Section 7.3 - Potential Cumulative Effect of the Draft LACAP in combination with other Plans and Projects, and Appendix 1</b></li> </ul>	N/A

	<p><b>- Relationship of the Plan with other relevant Plans and Programmes, as appropriate.</b></p> <ul style="list-style-type: none"> <li>• <b>To be amended to refer to the relevant information, as required under Schedule 2 of SI No 435 of 2004, as amended.</b></li> <li>• <b>Text to be added updating the SEA monitoring programme to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects arising due to plan implementation. Provide additional detail on monitoring programme data sources.</b></li> <li>• <b>To be updated to correct any errors concerning the occurrence of protected plant species and the presence of a national park in the South Dublin County Council administrative area.</b></li> <li>• <b>To be updated to reflect the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) in Section 7.3 - Potential Cumulative Effect of the Draft LACAP in combination with other Plans and Projects, and Appendix 1 - Relationship of the Plan with other relevant Plans and Programmes, as appropriate.</b></li> </ul>	
<p>Appropriate Assessment – Natura Impact Report</p>	<p>The following amendments to the included:</p> <ul style="list-style-type: none"> <li>• <b>Text to be added referring to communication on the energy transition of the fisheries and aquaculture sector in Section 3.4 - In-combination effects with Other Plans and Programmes, and Appendix 2 - Relationship with other plans and programmes, as appropriate.</b></li> <li>• <b>To be updated to correct any errors concerning the occurrence of protected plant species and the presence of a national park in the South Dublin County Council administrative area.</b></li> </ul>	<p>N/A</p>

	<ul style="list-style-type: none"> <li>• <b>To be updated to reflect the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) in Section 3.4 - In-combination effects with Other Plans and Programmes, and Appendix 2 - Relationship with other plans and programmes, as appropriate.</b></li> </ul>	
<p>Chief Executive's Recommendation</p>	<p>The new national <a href="#">Climate Action Plan 2024</a> was approved by Government on Wednesday 20<sup>th</sup> December 2023. Having regard to Section 1 Introduction of the Draft CAP, the following text is to be added:</p> <p><b>Climate Action Plan 2024</b></p> <p><b>Climate Action Plan 2024 builds upon previous Plans, by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. The Plan provides a roadmap for taking decisive action to halve Ireland's emissions by 2030 and reach net zero by no later than 2050, as committed to in the Climate Action and Low Carbon Development (Amendment) Act 2021.</b></p> <p><b>CAP24 recognises that local government has a key role to play in implementing measures to meet Ireland's national climate targets and in supporting and mobilising climate action, at the regional and local levels. This role will increase with the development of Local Authority Climate Action Plans (LACAP). These Plans will provide a strong emphasis on a place-based approach to climate action, promoting a better public understanding of climate related risks at the local level and addressing context specific conditions.</b></p> <p><b>CAP24 includes the following local government specific climate actions:</b></p>	<p>N/A. Climate Action Plan 2024 is subject to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA).</p>

	<p><b>LG/24/1 - Adopt the Local Authority Climate Action Plans</b>  <b>LG/24/2 - Develop Decarbonising Zones</b>  <b>LG/24/3 - Develop a monitoring and reporting system for the Local Authority Climate Action Plans</b>  <b>LG/24/4 - Review and update the Climate Action Charter</b>  <b>LG/24/5 - Roll out Phase 2 of the Smart and Sustainable Mobility Accelerator Programme</b>  <b>LG/24/6 - Support Cork and Dublin in the EU Climate - neutral and Smart Cities Mission</b></p> <p><b>The Council will continue to have regard to the national Climate Action Plan (and revisions thereof) in implementing and monitoring the local authority Climate Action Plan.</b></p> <p>This would result in the deletion of the following text on page 16 of the Draft Plan:</p> <p><del><b>The National Climate Action Plan 2023, launched on 21<sup>st</sup> December 2022, is the second annual update to the States' Climate Action Plan 2019, and the first to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021. It followed the introduction in 2022 of economy-wide carbon budgets and sectoral emission ceilings. Climate Action Plan 2023 (CAP23) sets out a roadmap to 2025 towards taking decisive action to halve emissions by 2030 and reach net zero, no later than by the end of 2050, as committed to in the Programme for Government.</b></del></p>	
<p>Chief Executive's Recommendation</p>	<p>The Regional Waste Management Planning Offices, RWMPO's, have prepared a Draft National Waste Management Plan for a Circular Economy, NWMPCE, which will be made in Q1 2024 and cover the period 2024 – 2030. Having regard to Section 1 Introduction of the Draft CAP, the following text is to be added:</p>	<p>N/A. The National Waste Management Plan for a Circular Economy is subject to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA).</p>

	<p><b>National Waste Management Plan for a Circular Economy</b></p> <p>The National Waste Management Plan for a Circular Economy has been prepared by the Local Government Sector arising from its obligations under the Waste Management Act. The Plan sets out a framework for the management of waste for the period 2024-2030 and adopts the ambition of 0% Waste Growth for every individual each year for the lifetime of the plan. The Plan sets out targets for the reduction of waste from households, businesses, and the construction sector and includes targets for improved compliance on the segregation of waste and the reuse and repair of materials.</p> <p>Core Policy 2 of the Plan relates to Climate Action and supports the delivery of the measures and actions prescribed in the Climate Action Plan to contribute to achieving the national climate targets.</p> <p>Circularity is a key driver of the National Waste Management Plan and is a common denominator across all sixteen focus areas in the Plan, with associated targeted policies and priority actions for implementation.</p> <p>The National Waste Management Plan for a Circular Economy is where circularity meets climate action and where the benefits of improved practices on waste prevention and management will contribute to the achievement of Ireland's climate targets over the coming years.</p> <p>The Plan was developed in collaboration with key partners and stakeholders and contains a range of key deliverables to ensure that the collaborative approach continues throughout the implementation phase of the Plan. The achievement of the priority actions set out in the plan will make a significant contribution to</p>	
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	<p><b>climate action and the co-ownership of the actions emphasises the contribution that all stakeholders must make.</b></p> <p><b>The implementation of the Plan will include continuous analysis of material flows and waste streams as key indicators for the achievement of the Plan ambition and targets and the Plan commits to an annual evaluation of the impact of the Plan on Circularity and Climate Action.</b></p>	
<p>Minor Text Changes</p>	<p>The Chief Executive recommends a number of minor text changes to the Draft Plan. These include correction of typographical errors, clarifications and references.</p>	<p>N/A</p>

## 5 Conclusions and Resolution

This Chief Executive's Report on the submissions received to the Draft Climate Action Plan, during Public Consultation, is hereby submitted to the Elected Members of the Local Authority, for their consideration.

An online Briefing for Elected Members will take place **on Wednesday 24<sup>th</sup> January 2024 from 2pm to 2.45pm**, to provide an overview of the Chief Executive's Report on Submissions Received and the February 2024 Council Meeting of South Dublin County Council will take place to decide by resolution, whether to:

- approve, or
- approve, subject to such modifications as they consider appropriate, the local authority climate action plan.

Taking into account the South Dublin County Council Draft Climate Action Plan 2024-2029, this Chief Executive's Report on Submissions Received, Strategic Environmental Assessment and Appropriate Assessment Screening of Chief Executive's Recommendations, it is proposed that the Draft Climate Action Plan be approved by the Elected Members, in accordance with the recommendations of this report.

The Elected Members shall give approval for the Climate Action Plan, 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, as amended.

Within thirty (30) days of the approval of the final local authority Climate Action Plan by the Elected Members, the Council will publish the final plan. The Climate Action Plan shall have effect for a period of five years from the date on which it is approved by the Elected Members.

### Resolution

In accordance with Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021 and having considered the Draft Climate Action Plan 2024-2029 and the Chief Executive's Report on Submissions Received, **this Council hereby resolves to APPROVE and ADOPT the Draft Plan.**

A screening determination for the need for Strategic Environmental Assessment (SEA) has been made by South Dublin County Council for the Modifications to the Draft Plan, under Directive 2001/42/EC. The screening assessment was carried out using the criteria for determining the likely significance of effects as set out in Schedule 1 of S.I. 435/2004, as amended.

Following assessment of the criteria and having regard to the nature of the Modifications to the Draft Plan and the potential for likely significant environmental effects associated with the Modifications, South Dublin County Council has concluded that the Modifications to the Draft Plan, will not give rise to likely significant effects on the environment.

Article 6(3) of the Habitats Directive, as transposed by S.I. No. 477/2011, as amended, requires that a final determination is made as to whether a plan or project would adversely affect the integrity of a European site. South Dublin County Council, pursuant to Article 6(3) of the Habitats Directive, as transposed by S.I. No. 477/2011, as amended, determines that the adoption and implementation of the LACAP will not individually, or in combination with any other plan or project, adversely affect the integrity of any European site.

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

<b>Submission Reference</b>	<b>Name</b>
<a href="#">SD-C292-CAP-1</a>	Future Of Dublin
<a href="#">SD-C292-CAP-2</a>	Patrick Kinsella
<a href="#">SD-C292-CAP-3</a>	Irish Green Building Council
<a href="#">SD-C292-CAP-4</a>	Uisce Éireann
<a href="#">SD-C292-CAP-5</a>	Environmental Protection Agency
<a href="#">SD-C292-CAP-6</a>	Local Authority Waters Programme
<a href="#">SD-C292-CAP-7</a>	Department of Transport
<a href="#">SD-C292-CAP-8</a>	Thomas Weafer
<a href="#">SD-C292-CAP-9</a>	Eoghan Brophy
<a href="#">SD-C292-CAP-10</a>	Councillor Derren Ó Brádaigh
<a href="#">SD-C292-CAP-11</a>	Development Applications Unit
<a href="#">SD-C292-CAP-12</a>	Litter Mugs / Dodder Action
<a href="#">SD-C292-CAP-13</a>	Community Gardens Ireland
<a href="#">SD-C292-CAP-14</a>	Dublin Cycling Campaign
<a href="#">SD-C292-CAP-15</a>	Not Here Not Anywhere
<a href="#">SD-C292-CAP-16</a>	Gas Networks Ireland
<a href="#">SD-C292-CAP-17</a>	People Before Profit
<a href="#">SD-C292-CAP-18</a>	Sea Fisheries coordination DAFM
<a href="#">SD-C292-CAP-19</a>	Department of Public Health - HSE Dublin and Midlands
<a href="#">SD-C292-CAP-20</a>	Hannah Byrne
<a href="#">SD-C292-CAP-21</a>	MEP Ciarán Cuffe
<a href="#">SD-C292-CAP-22</a>	Green Party Councillors and Representatives for South Dublin
<a href="#">SD-C292-CAP-23</a>	Neighbourhood Network
<a href="#">SD-C292-CAP-24</a>	HSE National Environmental Health Service
<a href="#">SD-C292-CAP-25</a>	Councillor Eoin Ó Broin Social Democrats
<a href="#">SD-C292-CAP-26</a>	Woodview Heights Residents Association
<a href="#">SD-C292-CAP-27</a>	Four Districts Woodland Habitat Group
<a href="#">SD-C292-CAP-28</a>	John O'Leary
<a href="#">SD-C292-CAP-29</a>	Codie Preston

<a href="#">SD-C292-CAP-30</a>	HSE National Office for Environmental Health Services
<a href="#">SD-C292-CAP-31</a>	Christopher Conway
<a href="#">SD-C292-CAP-32</a>	Department of the Environment, Climate and Communications

## Appendix II: Public Notice of Draft Plan Public Consultation



## FÓGRA MAIDIR LE HULLMHÚ DHRÉACHT-PHLEAN GNÍOMHAITHE ar son na hAERÁIDE 2024-2029 CHOMHAIRLE CONTAE BHAILE ÁTHA CLIATH THEAS

Tugtar fógra leis seo go bhfuil Dréachtphlean Gníomhaithe ar son na hAeráide 2024-2029 ullmhaithe ag Comhairle Contae Átha Cliath Theas, de bhun Alt 16 den Acht um Ghníomhú ar son na hAeráide agus um Fhorbairt Ísealcharbóin (Leasú) 2021.

Tá Tuarascáil ar an gComhshaoil ag gabháil leis an Dréachtphlean, arna hullmhú de réir Rialachán na gComhphobal Eorpach (Measúnú Comhshaoil ar Phleananna agus ar Chláir Áirithe) 2004 (I.R. 435 de 2004 arna leasú ag I.R. 200 de 2011) le haghaidh Measúnacht Straitéiseach Comhshaoil (MSC) agus Measúnacht Chúil (AA) i ndáil le Tuarascáil Tionchair Natura, de bhun Airteagal 6 den Treoir um Ghnáthóga 92/43/CEE.

Leagtar amach sa Dréachtphlean Gníomhaithe ar son na hAeráide conas is féidir leis an údarás áitiúil raon beart maolaithe, oiriúnaíthe agus bearta eile um ghníomhaíocht ar son na haeráide a chur chun cinn, chun cabhrú le hoibleagáidí náisiúnta aeráide agus Cuspóirí Foriomlán Náisiúnta Aeráid an Rialtais a chomhlíonadh, a fhéachann le haistriú go geilleagar atá athléimneach ó thaobh na haeráide de, saibhir ó thaobh na bithéagsúlachta de, inbhuanaithe ó thaobh an chomhshaoil de agus neodrach ó thaobh aeráide de a lorg agus a bhaint amach.

### Comhairliúcháin Poiblí

Beidh Dréachtphlean Gníomhaithe ar son na hAeráide Chomhairle Contae Átha Cliath Theas, an Measúnú Straitéiseach Comhshaoil, an Tuarascáil ar an gComhshaoil agus an Measúnacht Chúil i ndáil le Tuarascáil Tionchair Natura, ar taispeántóir **ó Chéadaoin an 20 Meán Fómhair go dtí Aoine an 3 Samhain 2023** ag na láithreacha seo a leanas:

- Ar líne trí Thairseach Comhairliúcháin Poiblí na Comhairle: <http://consult.sdublincoco.ie>
- Ag Comhairle Contae Átha Cliath Theas, Halla an Chontae, Tamhlacht, Baile Átha Cliath 24, D24A3XC (Luan go hAoine (seachas Laethanta Saoire Bainc) idir na huaireanta 10.00m agus 4.00m)
- Ag Oifig Cathartha Chluain Dolcáin, Cluain Dolcáin, Baile Átha Cliath 22 (Luan go hAoine (seachas Laethanta Saoire Bainc) idir na huaireanta 10.00m agus 12.00m agus 2.00m agus 4.00m)
- Ag na Leabharlanna Comhairle seo a leanas le linn gnáthhuaireanta oscailte:
  - Leabharlann an Chontae, Cearnóg na Leabharlaine, Tamhlacht, Baile Átha Cliath D24A3EX.
  - Leabharlann Bhaile Uí Ruáin, Ascaill Bhaile an Úlloird, Ráth Fearnáin, Baile Átha Cliath D14 VY33.
  - Leabharlann Chluain Dolcáin, Bóthar na Mainistreach, Cluain Dolcáin, Baile Átha Cliath D22 XPO3.
  - Ionad Siopadóireachta Leamhcáin, Bóthar an Chaisleáin Nua, Leamhcáin, Baile Átha Cliath K78 V295.
  - Leabharlann Chluain Dolcáin Thuaidh, Clós Lios an Chairn, Rualach, Baile Átha Cliath 22.

Fógrófar sonraí imeachtaí eile faoin gcomhairliúcháin poiblí ar shuíomh gréasáin na comhairle sa rannán "nuacht" <https://sdcc.ie> ar Shuíomh Gréasáin Ghníomhú ar son na hAeráide Bhaile Átha Cliath Theas <https://www.sdcc.ie/en/climate-action/>, agus ar na meáin shóisialta.

### Aighneachtaí/Tuairimí

Fáilítear roimh thuairimí nó roimh aighneachtaí ón bpobal agus ó pháirtithe leasmhara eile maidir leis an Dréachtphlean Gníomhaithe ar son na hAeráide agus/nó an Tuarascáil Chomhshaoil SEA agus/nó an Measúnacht Chúil (AA) Tuarascáil Tionchair Natura. Is féidir leat aighneacht nó tuairim a dhéanamh **ó Chéadaoin an 20 Meán Fómhair go dtí Aoine an 3 Samhain 2023** agus an dá dháta san áireamh, tríd an dá rogha seo a leanas amháin:

- Is féidir aighneacht scríofa a dhéanamh go leictreonaic trí Thairseach Chomhairliúcháin Poiblí Ar Líne na Comhairle: <http://consult.sdublincoco.ie> (go dtí **11.59m Aoine an 3 Samhain 2023**); Nó
- I scríbhinn, seolta chuig an **Innealtóir Sínearach, An Rannóg um Ghníomhú ar son na hAeráide, Comhshaoil, Uisce agus Athrú Aeráide, Halla an Chontae, Tamhlacht, Baile Átha Cliath 24 (tráth nach déanaí ná 4.00m an 3 Samhain 2023).**

**TABHAIR FAOI DEARA:** Déan d'aighneacht trí rheán amháin, le do thoil, i.e. tríd an bpost/ar líne. Ní ghlacfar le haighneachtaí déanta trí ríomhphost.

Maidir le haighneacht nó tuairim a dhéanamh, tabhair faoi deara le do thoil:

- Ba cheart d'aoinn agus do sheoladh a bheith san áireamh in aighneachtaí nó tuairimí agus, nuair is cuí, sonraí aon eagraíochta, grúpa pobail nó cuideachta srl. a bhfuil tú ag déanamh ionadaíochta dóibh.
- Spreagtar leanaí, nó grúpaí nó cumainn a dhéanamh ionadaíocht ar leasanna leanaí go háirithe, aighneachtaí nó tuairimí a dhéanamh maidir leis an méid sin thuas.
- Tabhair faoi deara le do thoil go bhfoilseofar gach aighneacht a gheofar ar líne. Ba cheart duit a chinntiú nach gcuirtear aon faisnéis chráiteach, clúmhilleach nó rúnda, lena n-áirítear faisnéis rúnda a bhaineann le tríú páirtí (nár thoiligh an tríú páirtí, go sainráite nó go hindíreach sna himthosca, lena n-áirítear) i d'aighneacht. Forchoimeádann Comhairle Contae Átha Cliath Theas an ceart aici féin aon aighneacht nó cuid de nach gcomhlíonann an rianachas seo a leasú. Tabhair faoi deara le do thoil go bhfoilseofar aighneacht ina hiomláine.

Cuirfead san áireamh aighneachtaí nó tuairimí i scríbhinn maidir leis an Dréachtphlean atá curtha isteach laistigh den tréimhse luaithe, sula dtionsófar an Plean.

Tabhair faoi deara le do thoil **nach** bpléifear aighneachtaí ná tuairimí **DÉANACHA**. Moltar go láidir duit d'aighneacht nó do thuairim a dhéanamh chomh luath agus is féidir.

### Cosaint Sonraí

Príseálfar gach aighneacht de réir an bheartais phríobháideachais ábhartha, ar féidir teacht air anseo: <https://consult.sdublincoco.ie/ga/content/privacy-statement>.

Tabhair faoi deara le do thoil go bhfuil freagraí ar an gcomhairliúcháin seo faoi réir fhorálacha an Achte um Shaoir Faisnéise 2014 (SF), na Rialachán um Rochtain ar Fhaisnéis faoin gComhshaoil 2007-2018 (AIE) agus an Achte um Chosaint Sonraí 2018.

### Teresa Walsh

Stiúrthóir na Seirbhíse, Comhshaoil, Uisce agus Athrú Aeráide

20 Meán Fómhair 2023

[www.sdcc.ie](http://www.sdcc.ie)

## NOTICE OF THE PREPARATION OF THE SOUTH DUBLIN COUNTY COUNCIL DRAFT CLIMATE ACTION PLAN 2024-2029

Notice is hereby given that South Dublin County Council has, pursuant to Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021, prepared a Draft Climate Action Plan 2024-2029.

The Draft Plan is accompanied by an Environmental Report, prepared in accordance with the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. 435 of 2004 as amended by S.I. 200 of 2011) for Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) Natura Impact Report, pursuant to Article 6 of the Habitats Directive 92/43/EEC.

The Draft Climate Action Plan sets out how the local authority can promote a range of mitigation, adaptation and other climate action measures, to help deliver on the national climate obligations and the Government's overall National Climate Objective, which seeks to pursue and achieve, by no later than the end of 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy.

### Public Consultation

The South Dublin County Council Draft Climate Action Plan, the Strategic Environmental Assessment Environmental Report and Appropriate Assessment Natura Impact Report, will be on display from **Wednesday 20th September to Friday 3rd November 2023** at the following locations:

- Online via the Council's Public Consultation Portal: <http://consult.sdublincoco.ie>
- At South Dublin County Council, County Hall, Tallaght, Dublin 24, D24A3XC (Monday to Friday (excluding Bank Holidays) between the hours of 10.00am and 4.00pm)
- At Clondalkin Civic Office, Clondalkin, Dublin 22 (Monday to Friday (excluding Bank Holidays) between the hours of 10.00am and 12.00pm and 2.00pm and 4.00pm)
- At the following Council Libraries during normal opening hours:
  - County Library, Library Square, Tallaght, Dublin D24A3EX.
  - Ballyroan Library, Orchardstown Avenue, Rathfarnham, Dublin D14 VY33.
  - Clondalkin Library, Monastery Road, Clondalkin, Dublin D22 XPO3.
  - Lucan Shopping Centre, Newcastle Road, Lucan, Dublin K78 V295.
  - North Clondalkin Library, Liscarne Close, Rowlagh, Dublin 22.

Details on other public consultation events will be advertised on the council website within the news section <https://sdcc.ie>, the South Dublin Climate Action Website <https://sdcc.ie/en/climate-action>, and social media.

### Submissions/Observations

Observations or submissions regarding the Draft Climate Action Plan and/or SEA Environmental Report and/or Appropriate Assessment Natura Impact Report, are invited from members of the public and other interested parties. You can make a submission or observation between **Wednesday 20th September and Friday 3rd November 2023** inclusive, through the following two options only:

- A written submission can be made electronically through the Council's Online Public Consultation Portal: <http://consult.sdublincoco.ie> (up to **11.59pm on Friday 3rd November 2023**); Or
- In writing, addressed to the **Senior Engineer, Climate Action, Environment, Water and Climate Change Department, County Hall, Tallaght, Dublin 24 (not later than 4.00pm on 3rd November 2023)**.

**NOTE:** Please make your submission by one medium only i.e. post/online. Email submissions will not be accepted.

In respect of making a submission or observation, please note the following:

- Submissions or observations should include your name and address and, where relevant, details of any organisation, community group or company etc. which you represent.
- Children, or groups or associations representing the interests of children, are particularly encouraged to make submissions or observations regarding the foregoing.
- Please be advised that all submissions received will be published online. You should ensure that no vexatious, libellous, or confidential information, including confidential information relating to a third party (in respect of which the third party has not, expressly, or impliedly in the circumstances, consented to its disclosure) is included in your submission. South Dublin County Council reserves the right to redact any submission or part thereof that does not comply with this requirement. Please be advised that the submission will be published in full.

Written submissions or observations with respect to the Draft Plan that are made within the period stated, will be taken into consideration before the making of the Plan.

Please note **LATE** submissions or observations will **not** be considered. You are strongly advised to make your submission or observation as early as possible.

### Data Protection

All submissions will be processed in accordance with the relevant privacy policy, which can be accessed here: <https://consult.sdublincoco.ie/en/content/privacy-statement>.

Please note that responses to this consultation are subject to the provisions of the Freedom of Information Act 2014 (FOI), Access to Information on the Environment Regulations 2007-2018 (AIE) and the Data Protection Act 2018.

### Teresa Walsh

Director of Service, Environment, Water and Climate Change

20th September 2023

[www.sdcc.ie](http://www.sdcc.ie)

Irish Times 33x6 (255mm)  
Tallaght Echo 33x7 (265mm)  
Gazette 34x7 (265mm)

GF

## **Appendix III: SEA Screening Conclusion and Determination and AA Screening Conclusion and Determination**

### **Modifications to the Draft Local Authority Climate Action Plan 2024 – 2029 for the South Dublin County Council functional area.**

#### **Strategic Environmental Assessment Screening Determination under SEA Directive 2001/42/EC as transposed into Irish law under the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. 435/2004), as amended.**

South Dublin County Council has prepared a Draft Local Authority Climate Action Plan (LACAP) for the South Dublin County Council functional area for the years 2024 – 2029 under Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021.

A screening determination for the need for Strategic Environmental Assessment (SEA) has been made by South Dublin County Council for the Modifications to the Draft LACAP under Directive 2001/42/EC. The screening assessment was carried out using the criteria for determining the likely significance of effects as set out in Schedule 1 of S.I. 435/2004, as amended.

The Modifications to the Draft LACAP have been made following a review of the issues raised during the prescribed public consultation period for the Draft LACAP from Wednesday 20th September 2023 to Friday 3rd November 2023 and subsequent consideration by South Dublin County Council.

The Draft LACAP has been informed by a SEA and an SEA Environmental Report has been prepared outlining the likely environmental effects of the Plan in accordance with the SEA Directive 2001/42/EC. Measures have been integrated into the Draft LACAP that provide for and contribute towards environmental protection, environmental management and sustainable development.

Following assessment of the criteria and having regard to the nature of the Modifications to the Draft LACAP and the potential for likely significant environmental effects associated with the Modifications, South Dublin County Council has concluded that the Modifications to the Draft LACAP will not give rise to likely significant effects on the environment.

This determination has been made following consideration of the information contained in an SEA Screening Report for the Modifications to the Draft LACAP, and the criteria set out in Schedule 1 to S.I. 435/2004, as amended. The principal reasons the Modifications to the Draft LACAP will not give rise to likely significant effects on the environment are as follows:

- The modifications are only intended to provide clarification on existing Climate Actions defined in the Draft LACAP and make the LACAP more operative and focussed.

- The modifications are not material and will not result in any additional, likely significant environmental effects not already considered in the SEA Environmental Report for the Draft LACAP.

Taking account of the above, it is determined that full SEA is not required to be undertaken for the Modifications to the Draft LACAP.

An SEA Statement will be prepared following adoption of the LACAP, which will detail the SEA process undertaken for the LACAP.

Signed by:

A handwritten signature in black ink, appearing to read 'Teresa Walsh', with a long horizontal flourish extending to the right.

Teresa Walsh

Director of Environment, Water and Climate Change, South Dublin County Council

Date: Monday 8<sup>th</sup> January 2024

**Modifications to the Draft Local Authority Climate Action Plan 2024 – 2029 for the South Dublin County Council functional area.**

**Appropriate Assessment (AA) Screening Determination under the EU's Habitats Directive 92/43/EEC Article 6(3) as transposed into Irish law under Regulation 42(1) of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477/2011), as amended.**

South Dublin County Council has prepared a Draft Local Authority Climate Action Plan (LACAP) for the South Dublin County Council functional area for the years 2024 – 2029 under Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021.

A screening determination for the need for Appropriate Assessment (AA) has been made by the Council in respect of the Modifications to the Draft Local Authority Climate Action Plan in accordance with the requirements of Article 6(3) of the Directive 92/43/EEC (Habitats Directives) and Regulation 42(1) of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended).

The Modifications to the Draft LACAP have been made following a review of the issues raised during the prescribed public consultation period for the Draft LACAP from Wednesday 20<sup>th</sup> September 2023 to Friday 3<sup>rd</sup> November 2023 and subsequent consideration by South Dublin County Council.

The Draft LACAP has been informed by an AA and a Natura Impact Report has been prepared outlining the likely environmental effects of the Plan on European sites, in accordance with the Habitats Directive 92/43/EEC. Measures have been integrated into the Draft Plan that mitigate its potential effects on any European site.

Following assessment and having regard to the nature of the Modifications to the Draft LACAP and the potential for likely significant environmental effects associated with the Modifications, South Dublin County Council has concluded, in view of best scientific knowledge and in view of conservation objectives, that the Modifications to the Draft LACAP will not give rise to any likely significant effects on designated European sites, alone or in combination with other plans or projects.

This determination has been made following consideration of the information contained in an AA Screening Report for the Modifications to the Draft LACAP. The principal reason the Modifications to the Draft LACAP will not give rise to any likely significant environmental effects on designated European sites, alone or in combination with other plans or projects, are as follows:

- The modifications are not material and will not result in any additional, likely significant environmental effects, including effects on ecological processes or European sites, not already considered in the NIR for the Draft LACAP.

Taking account of the above, it is determined that full AA is not required to be undertaken for the modifications to the Draft Local Authority Climate Action Plan 2024 – 2029.

An AA Conclusion Statement will be prepared following adoption of the Plan, which will detail the AA process undertaken for the Plan.

Signed by:

A handwritten signature in black ink, appearing to read 'Teresa Walsh', with a long horizontal flourish extending to the right.

Teresa Walsh

Director of Environment, Water and Climate Change, South Dublin County Council

Date: Monday 8<sup>th</sup> January 2024