



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council



CHIEF EXECUTIVE'S REPORT
ON SUBMISSIONS RECEIVED

DUBLIN CITY COUNCIL

DRAFT CLIMATE CHANGE ACTION PLAN 2019-2024

MAY 2019



Contents

Item	Page Number
0.1 Introduction	3
0.1.1 Purpose of the Report	3
0.1.2 Background	3
0.1.3 Public Consultation	4
0.2 Details of the Public Consultation Process	5
0.2.1 Objectives of the Public Consultation Process	5
0.2.2 Outline of Public Consultation Process	5
0.2.3 How did you hear about the Public Consultation	6
0.2.4 Public Information Drop-In Events	6
0.3 Details of the Submissions	8
0.3.1 Introduction	8
0.3.2 List of Persons, Organisations and Bodies who made Submissions	8
0.3.3 Summary of Issues Raised in Submissions	8
0.4 Chief Executive's Responses	11
0.4.1 Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)	11
0.4.2 Structure of the Report	11
0.5 Categorisation, Summary and Responses to Issues Raised	13
0.5.1 Executive Summary	13
0.5.2 Introduction	13
0.5.3 Milestone 1: Initiate	14
0.5.4 Milestone 2: Research	16
0.5.5 Milestone 3: Plan	18
0.5.6 Action area: Energy & Buildings	20
0.5.7 Action area: Transport	38
0.5.8 Action area: Flood Resilience	62
0.5.9 Action area: Nature Based Solutions	72
0.5.10 Action area: Resource Management	82
0.5.11 Milestone 4: Implementation	89
0.5.12 Milestone 5: Monitoring & Iteration	92
0.5.13 Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)	93
0.5.14 General Comments	113
0.5.15 Summary of Chief Executive's Proposed Amendments	134
0.6 Conclusions	146
Appendix A: List of Persons, Organisations and Bodies who made Submissions	
Appendix B: Newspaper Notice	
Appendix C: SEA Screening Determination	
Appendix D: AA Screening Determination	

List of Tables

Table 0.2.1	Breakdown of Responses
Table 0.3.1	Overview of Submissions
Table 0.3.2	Breakdown of Responses for all Categories
Table 0.5.6	Action Area: Energy and Buildings - Summary of amendments to actions and new actions
Table 0.5.7	Action Area: Transport- Summary of amendments to actions and new actions
Table 0.5.8	Action Area: Flood Resilience - Summary of amendments to actions and new actions
Table 0.5.9	Action Area: Nature Based Solutions - Summary of amendments to actions and new actions
Table 0.5.10	Action Area: Resource Management- Summary of amendments to actions and new actions

List of Figures

Figure 0.2.1	Photographs from Mansion House public event 16-2-19 hosted by Dublin City Council
Figure 0.3.1	Breakdown of issues raised per section of Draft CCAP
Figure 0.3.2	Infographic 'word cloud' of submissions received on DCC Draft CCAP

0.1 Introduction

0.1.1 Purpose of the Report

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

The Council undertook public consultation from Monday 11th February to Monday 25th March 2019 inclusive. 234 valid submissions were received.

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

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

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

0.1.2 Background

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

In the Dublin Metropolitan Region, the four Dublin Draft Climate Change Action Plans have been prepared in partnership with Codema (Dublin's Energy Agency), following extensive and ongoing engagement with Dublin City Council, and the other Dublin local authorities, throughout 2017/2018. The recently established Dublin Climate Action Regional Office (CARO), one of 4 CAROs established in late 2018 have worked with Codema and the 4 Dublin Local Authorities in finalising the Draft plans and the public consultation process. The Draft Climate Change Action Plans address both climate change mitigation and adaptation. This is a result of the following: the Dublin local authorities are signatories to the EU Covenant of Mayors for Climate & Energy, which address both climate change adaptation and mitigation, and the significant experience of Codema in developing mitigation baseline emission inventories and the completion of a Spatial Energy Demand Analysis for the four Dublin local authorities and related mapping outputs.

0.1.3 Public Consultation

Public consultation on the Draft Climate Change Action Plan took place over a six-week period from Monday 11th February to Monday 25th March 2019, with 234 valid submissions received in total.

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

DRAFT CEREPOR

0.2 Details of the Public Consultation Process

0.2.1 Objectives of the Public Consultation Process

The objectives of the Draft Climate Change Action Plan public consultation process were as follows:

- Increase awareness of the Draft Climate Change Action Plan for the general public, various stakeholders, prescribed bodies, and Council staff;
- Provide opportunities for more creative and dynamic engagement with a variety of interested parties, including younger citizens, older citizens and locally based community and residents' groups;
- Increase the number, variety and quality of submissions received, appropriate to the Draft Climate Change Action Plan;
- Encourage longer term engagement strategies beyond the Draft Climate Change Action Plan Stage, and scope follow up activities; and
- To align with the Council's internal and external communication objectives.

0.2.2 Outline of Public Consultation Process

The Council has used a variety of online and supporting 'face to face' methods, to consult and engage with the citizens of Dublin City Council area and a range of other stakeholders and interested parties.

- A Newspaper Notice appeared in the Irish Independent on Monday 11th February 2019 and in the Dublin Gazette on Thursday 14th February 2019. A copy of the Newspaper Notice is contained in Appendix B.
- A public consultation video was prepared on behalf of the four Dublin local authorities publicising climate actions and the public consultation process. The video was embedded on the dublinclimatechange.ie website and 30-second clips were used to promote the video on social media, with over 6,600 combined views alone on the Dublin CARO and Codema twitter accounts.
- 4,000 individual users accessed www.dublinclimatechange.ie since it was launched until the public consultation period ended (11th Feb – 25th Mar 2019).
- Codema developed a generic information leaflet (2,000 copies printed) and event programmes (500 copies printed each) for the #Councils4ClimateAction events. This material helped to provide information on the Plans and to promote what was taking place at each of the events. These leaflets were widely available online to help spread the word and cut down on the need for printed copies.
- The #Councils4ClimateAction social media campaign was particularly effective throughout the public consultation process and for promoting the Councils' events.
- Codema acted as the central liaison point between all four Councils' Communications Teams and together a central message was formed around the plans and the 'make a submission' call to action.
- Press releases were issued by the four DLAs and Codema in the run up to the public consultation period opening, and the public events, resulting in widespread national and local media coverage such as the Irish Times, RTE Television Six-One and Nine O'Clock News Bulletins, Virgin Media One News Bulletins, RTE Radio 1 and Newstalk 106-108fm.

0.2.3 How did you hear about the Public Consultation?

Consultees entering their submissions through the Council's Citizen Space public consultation portal were invited to indicate how they heard about the public consultation. The aim of this question was to gain a greater insight into the methods of communication and information dissemination open to the Council, in engaging with the general public and other stakeholders.

Table 0.3.1 Breakdown of Responses

Option	Total	% of Respondents
Newspaper	2	1%
Word of Mouth	21	9%
Radio	1	0.5%
Email	13	6%
Social Media	29	12%
Television	1	0.5%
Other	44	18%

0.2.4 Public Information Drop-In Events

The Council undertook a series of Public Information Drop-In Events as follows:

- Saturday 16th February 2019, Round Room at the Mansion House 12-5pm (see Figure 0.2.1),
- Incorporating the launch of the Dublin Climate Action Regional Office,
- with 470 attendees approximately.
- External stakeholders included: SEAI (Energy), GoCar, UPS, BleeperBike, Hyundai, Vita (Transport), LawCo (Flood Resilience), Tree Council of Ireland and Green Leaf (Nature-Based Solutions), Stop Food Waste / EPA Mater Composters, Refill and Rediscovery Centre (Resource Management), An Taisce, Cool Planet Experience, Comhairle na nÓg, Eco Unesco, Recreate (Climate/Environment/Youth Groups)
- Additional information sessions took place in 4 DCC public libraries on the following dates:
 - Cabra Library – Tuesday 19th March from 12.30 to 2.30pm
 - Central Library, Ilac Centre – Wednesday 20th March from 12.30 to 2.30pm
 - Rathmines Library, Thursday 21st March from 2.30 to 4.30pm

- Raheny Library, Friday 22nd March from 12.30 to 2.30pm



Figure 0.2.1.: Photographs from Mansion House public event 16-2-19 hosted by Dublin City Council

0.3 Details of the Submissions

0.3.1 Introduction

A total of 234 valid submissions were received, the breakdown of submissions is as follows:

Table 0.3.2: Overview of Submissions

Online Portal Submissions	121
Email Submissions	108
Posted / Handed Submissions	5
Total Submissions	234

All submissions were read, analysed and summarised. A list of the persons, organisations and bodies that made submissions is provided in Appendix A. The categorisations and summary of issues raised, together with the Chief Executive's response and recommendations is contained in Section 0.5 onwards. **NB:** The headings relating to the categorisation and summary of issues raised, together with the Chief Executive's response and recommendations, follows that of the headings of the Draft Climate Change Action Plan document i.e. Section 0.5.1 Executive Summary, Section 0.5.2 Introduction, and so forth.

0.3.2 List of Persons, Organisations and Bodies who made Submissions

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

0.3.3 Summary of Issues Raised in Submissions

All 234 valid submissions received by the Council were read and analysed. Each of the category headings together with the number of times that responses were raised in relation to each category is detailed below. A submission may raise multi responses and they are separated and appear as separate entries in the appropriate category.

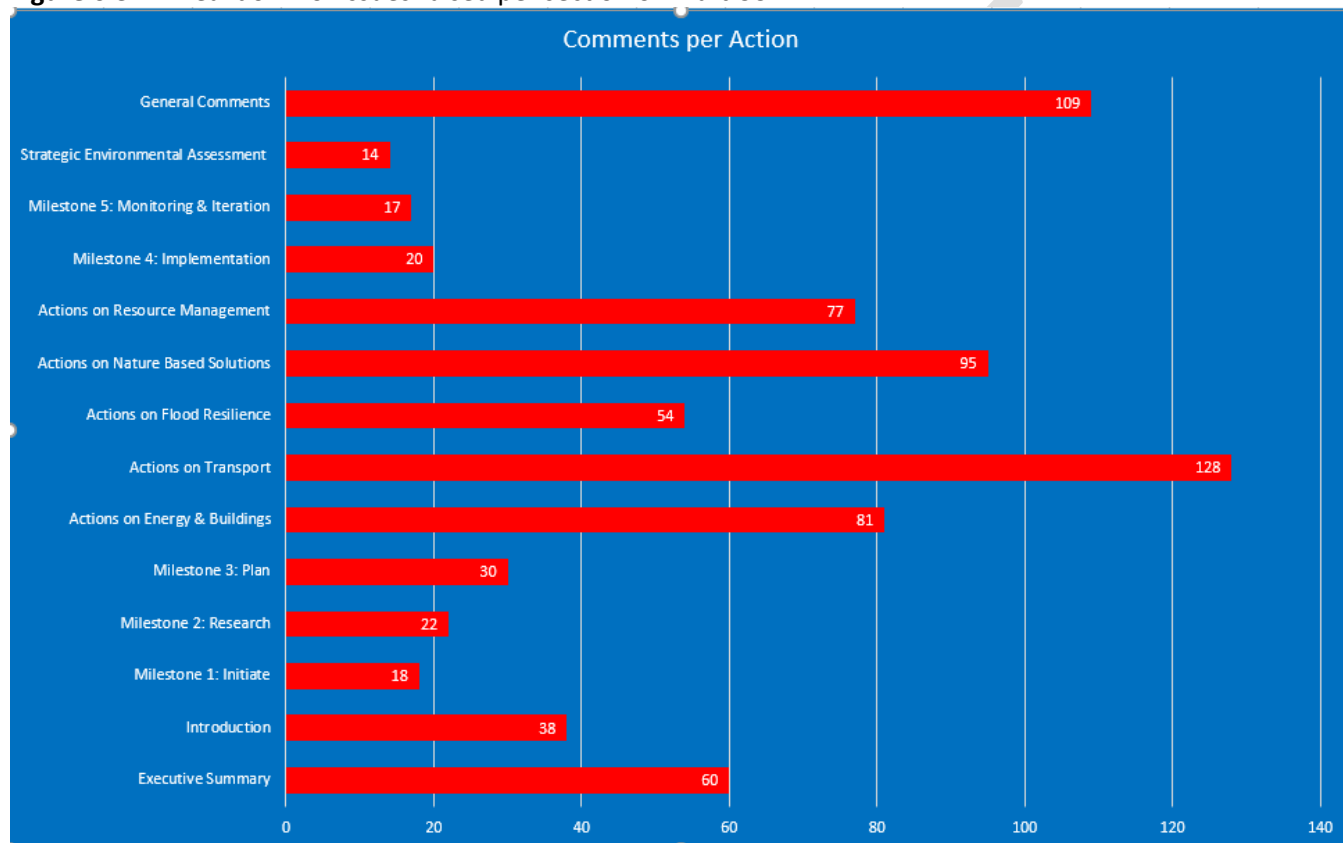
Table 0.3.2: Breakdown of Responses for all Categories

Submission Category	Response Raised (No.)	% of Total Respondents (out of 234)
Executive Summary	60	26%
Introduction	38	16%
Milestone 1: Initiate	18	8%
Milestone 2: Research	22	9%
Milestone 3: Plan	30	12%
Actions on Energy & Buildings	81	35%
Actions on Transport	128	55%
Actions on Flood Resilience	54	23%
Actions on Nature Based Solutions	95	40%
Actions on Resource Management	77	33%

Milestone 4: Implementation	20	9%
Milestone 5: Monitoring & Iteration	17	7%
SEA & AA	14	6%
General Comments	109	47%

In terms of the responses that were raised most frequently, the highest number (128 times) related to Actions on Transport. The second highest proportion of issues raised (109 times) related to General Comments. A breakdown for comments per section of the CCAP is included in Figure 0.3.1 below.

Figure 0.3.1: Breakdown of issues raised per section of Draft CCAP



0.4 Chief Executive's Responses

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

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

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

For actions where no change is recommended comments under the Strategic Environmental Assessment and Appropriate Assessment are as follows:

Strategic Environmental Assessment Comment where the recommendation is "No Change to the Action"

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

Appropriate Assessment comment where the recommendation is "No Change to the Action"

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

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

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

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

0.4.2 Structure of the Report

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

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

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

Deletions to the text are shown in ~~red with strikethrough~~.

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

DRAFT CE REPORT

0.5 Categorisation, Summary and Responses to Issues Raised

0.5.1 Executive Summary:

There were 60 submissions to this chapter. Some dealt with penalising single use plastics, chemical cleaning products, and cheap flights, and taxing food imports and high emission foods whilst subsidising local foods. A city driving curfew was suggested, as were reductions in parking spaces and more EV charging points. A submission sought a timetable for upgrades to Social homes. Several sought to have conditions imposed through Planning on energy efficiency and also on the impact planning policy can have on reducing unnecessary travel. There were requests for more solar bins, recycling bins, signage on these bins and recycling initiatives. Alternatives to flood walls should be investigated and European models should be considered. There were requests to offer greater protection to our Biosphere, and more native trees. Reference was made to Green mortgages, the Home Performance Index and the two baskets approach to emissions reduction and there should be links with sustainable businesses. An Online dashboard should be developed.

Chief Executive's Response:

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

0.5.2 Introduction:

There were 38 submissions made under this heading. Public education was mentioned in several as was retrofitting. The encouragement of green mortgages and consideration of carbon impact in procurement was raised as was a suggestion that the LEO link with sustainable businesses. Consideration of soil sealing was raised. Renewable sources including district heating and solar were the subject of some submissions and feed in tariffs were linked to these. A submission seeking consideration of food waste, campaigns around this, consideration of the carbon footprint of imports and the encouragement of local food was made. The use of Libraries was suggested for repair cafes, transport groups and air quality information. Consideration of roof gardens and pollinators was also included in submissions.

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

Chief Executive's Response:

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

0.5.3 Milestone 1: Initiate

There were 18 submissions to this section of the draft Dublin City Council Climate Change Action Plan (CCAP). Submissions related to planning holistically for the wider climate change agenda; urban sustainability; quality of life for all citizens, and wildlife and biodiversity in Dublin. Specific examples included plastics, water fountains, skateboarding, segregated cycle lanes, links to business and to Europe; the banning of corri-board and the public realm.

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

The Dublin CARO will work with all four Dublin councils in implementing CCAP actions, including developing research opportunities and pilot projects across the four Dublin local authorities. The CARO will also have a role in reviewing action implementation across the four Dublin local authority CCAPs. The CCAP will be updated on an annual basis, with a review and revision every five years.

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

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

The promotion of cycling and walking is dealt with under the Transport section. Specific issues in relation to the recycling of plastics is dealt with under the Resource Management section. The introduction of a plastics levy is a national issue and beyond the scope of this CCAP however Dublin City Council are undertaking their own initiatives in this area including the removal of these items from all DCC canteens; the introduction of a Co-Cup Deposit and Return Scheme - a pilot project which sees Dublin City Council working with Dublin City University and Trinity College Dublin to reduce the amount of single use cups in these institutions. Dublin City Council will also work with Refill Ireland which aims to reduce our dependence on single use drinking bottles. The aim in 2019 is to work with Refill at an event in the city and to grow on this and to demonstrate there is an alternative to single use plastics in these types of events.

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

DRAFT CE REPORT

0.5.4 Milestone 2: Research

There were 23 submissions to this of the draft Dublin City Council Climate Change Action Plan (CCAP). Submissions related to the science of climate change, support for renewable energy projects, public authority leadership, CCAP iteration, and developing best practice. Many of these are dealt with in the main sections. Specific examples include mental health, public engagement, corri-board, advice on retrofitting, reduced use of plastics, preventing damage to sand dunes, flood plains and the use of peat, links to business and to Europe, carbon taxes, feed in tariffs for energy production, green walls, rainwater harvesting, public realm, public transport, and air quality.

Submissions related to the science and evidence base behind climate change and the Draft CCAP

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

To inform the 5 Action Areas of the Plan, the Draft CCAP includes detailed climate change adaptation and mitigation baselines. The adaptation baseline has been prepared using a variety of sources, in particular Met Éireann data and the Council's own extreme weather events records. This evidence informed the climate change risk matrix included in the Draft CCAP. The mitigation baseline has been prepared using the Council's own energy consumption data. This is used to undertake the annual Sustainable Energy Authority of Ireland (SEAI) Monitoring & Reporting (M&R) which is a requirement for all public sector organisations in order to meet 33% energy efficiency target by 2020 under the National Energy Efficiency Action Plan.

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

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

Submissions related to the future iterations of the CCAP

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

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

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

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

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment

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

0.5.5 Milestone 3: Plan

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

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

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

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

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

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

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

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

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

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

0.5.6 Action Area: Energy and Buildings

28 actions are outlined under the theme of Energy and Buildings in Dublin City Council's Climate Change Action Plan 2019-2024. 82 submissions were received to the main Energy and Buildings chapter whilst a number of additional submissions were made throughout the other more general chapters. There are 9 new actions as a result of submissions with some new text also clarifying or expanding on issues raised in the submissions.

The issue raised most frequently was the requirement to retrofit both the public and the private housing stock, to bring the Council stock to a Building Energy Rating (BER) A rating within definite timelines and to seek ways to encourage/incentivise private landlords to improve energy efficiency. Following closely were submissions on renewable energy technologies, particularly in relation to the use of solar energy and the need to provide feed in tariffs for residents who make the investment. Several submissions related to the value of the proposed district heating project and another for consideration of geothermal energy. Submissions were also made on making planning applications conditional on the inclusion of sustainable energy works. Quite a number of submissions sought a big increase in the use of LED lighting and the consideration of solar power for public lighting. A few sought the development of underused and inappropriately used lands and of empty houses, with an impact on fuel trips. Green procurement and the need to consider innovative approaches to energy. A concern raised in several submissions was the need to consider construction materials particularly in the context of embodied carbon. Again, several submissions referred to the need for the Council to be a role model in their approach to energy efficiency, and the value of promoting the good works already being carried out by the Council. The value of the proposed Energy Masterplan was referred to and the need for data from such a plan to inform energy policy going forward. Energy performance indicators were also sought in a submission as were targets for the Council's own stock and energy ratings particularly given the positive impact on fuel/ energy poverty. Funding sources should be sought to enable to Council to carry out these energy improvement works. Targets for energy efficiency, for emissions, for the roll out of LED lighting, for DEC's, for the energy oversight projects and for the roll out of the Home Energy Kits were sought.

Energy Planning and Management: Monitoring of Targets

Energy and GHG emission Monitoring: Many submissions sought to have the monitoring of Energy and GHG emissions included in the CCAP. Specific reference was made to City Council Fire Brigade stations and other public buildings, whilst green procurement was also raised.

Chief Executive's Response

- (i) Dublin City Council is on track to meet the public sector target of a 33% improvement in energy efficiency by 2020; this is an average improvement in energy efficiency of approximately 3% per year in the Council's own buildings and operations. This target is tracked through SEAI's monitoring and reporting (M&R) system. The M&R is a compliance tool to show the council how it is performing to achieve their targets. The City Council currently uses the data from the M&R to develop the yearly Energy Review. Dublin Fire Brigade and Dublin City Council's large offices have been listed as SEUs under the Energy Review so specific goals and targets will be set for each.

- (ii) It is intended that the Energy review will include a glide path illustrating the energy efficiency and GHG emission targets for the City Council up to and including 2030. The Energy Masterplan will also inform this process going forward.
- (iii) Dublin City Council is also working to implement an energy management system to ISO 50001 standard. This system will aid the local authority in developing more innovative energy efficiency projects to help the Council improve on its energy efficiency and assist in achieving GHG emission reduction targets. Green Procurement will also form part of this system
- (iv) The City Council has an energy oversight committee (EOC) that works to ensure that existing energy reduction projects are monitored and that new projects are identified. The EOC currently has an action plan that the committee track through the lifetime of the projects. Each project is currently listed in the Draft CCAP.
- (v) The Council is also a signatory to the EU Covenant of Mayors for Climate and Energy initiative, which is a voluntary commitment by members to develop and implement Sustainable Energy and Climate Action Plans (SECAPs) and reduce their regions' greenhouse gases (GHGs) by 40% by 2030. DCC will apply this target to its own operations but will also influence a reduction in GHGs throughout the City, through leading by example and working with key stakeholders and decision makers. This 40% reduction in greenhouse gas emissions by 2030 is just a target and does not limit DCC to this target level. Appendix II of the Draft CCAP gives a baseline for total Emissions in Dublin City and this will be updated every two years in accordance with EU Covenant of Mayors for Climate & Energy protocol. This will address the submissions seeking better reporting and monitoring in the CCAP.
- (vi) Action 1 of the Energy & Buildings Action Area of the Draft CCAP proposes to *"Create Energy Master Plan for the Dublin Region"*.

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

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

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

Energy Planning and Management: Review of Targets

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

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

Chief Executive's Response

- In Ireland, the public sector has mandatory energy efficiency targets. It is set in the context of Ireland's EU and national commitments and wider climate change goals, whereby a target of 33% energy efficiency improvement is to be achieved by all Irish public bodies (as defined in Statutory Instrument 426 of 2014) by 2020. Public bodies are required to report annual energy efficiency data to the Sustainable Energy Authority of Ireland (SEAI) which manages the reporting process on behalf of the Department of Communications, Climate Action and Environment (DCCAE). SEAI have just announced that they will be releasing a 2030 target later on this year in conjunction with other upgrade measures they are doing to the system and the City Council will reflect any changes in their own targets as required. There is currently no statutory requirement to undertake sectoral mitigation plans, including revised sectoral, local authority emissions reductions targets.
- Being a signatory to the EU Covenant of Mayors for Climate & Energy, the Council has voluntarily committed to a 40% reduction in the Council's greenhouse gas emissions by 2030. Across Europe, signatory cities pledge action to support implementation of the EU 40% greenhouse gas-reduction target by 2030 and the adoption of a joint approach to tackling mitigation and adaptation to climate change.
- The Government has published the Draft National Energy & Climate Plan 2021-2030 (NECP). This first draft of the NECP takes into account energy and climate policies developed to date, the levels of demographic and economic growth identified in the Project 2040 process and includes all of the climate and energy measures set out in the National Development Plan 2018-2027. It is the first step in the process of putting together the final National Energy and Climate Plan and further iterations of the plan will take into account additional policies and measures and the All-of-Government climate action plan to be completed in 2019. A final version of the NECP will be submitted to the European Commission by 31st December 2019.
- In March 2019, the Oireachtas published its '*Climate Change: a cross-party consensus on climate action*' report. The report recommends that new legislation be enacted by the Oireachtas, providing a new legal framework for tackling climate change. The report states that this should include the setting of legally binding GHG emissions targets for mitigation and renewable electricity for 2030 and 2050, reflecting the latest IPCC consensus and the need for Ireland to make immediate progress in meeting existing EU emissions reductions 2030 targets.

- The Climate Action and Low Carbon Development Act 2015 and National Adaptation Framework require sectoral adaptation/climate change action plans to be submitted to Government for approval by 30th September 2019. The Climate Action and Low Carbon Development Act 2015, the National Mitigation Plan and the National Adaptation Framework, do not require additional public sector climate change targets to be implemented.
- In summary, the City Council will commit to review the energy and GHG emission targets following any revisions to these targets nationally as local authorities in Ireland have no statutory role in setting energy and climate change targets. It is considered that the identification of additional local authority energy and climate change targets is not appropriate at this stage, is pre-mature in advance of any revised national legislation in this regard, and; therefore, should not be included in the Draft CCAP. This matter should be primarily addressed at a national level, in advance of addressing such issues at a local authority level.

Chief Executive's Recommendation

The following additional new actions are proposed to the draft CCAP

New Actions:

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

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

SEA Comment

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

Appropriate Assessment Comment

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

Mandating roofs on new buildings to include renewable energy technologies / green roofs

- A number of submissions relate to mandating roofs on all new buildings to include renewable energy technologies and use as green roofs / green spaces. Submissions also request the prioritisation of south facing aspect for new dwellings, that current building regulation standards be exceeded, and the requirement for new buildings to have an A rated Building Energy Rating (BER).
- It is noted that the energy efficiency and renewable energy requirements for the construction of new homes and non-residential buildings are primarily addressed in the

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

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

Chief Executive's Recommendation

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

SEA Comment

These two actions as recommend will provide information on the energy efficiency and targets through diagrams (glide path) as well as biannual updates of total emissions. These in and of themselves do not give rise to landuse effects. No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

Appropriate Assessment Comment

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

Energy Efficiency, Renewables, Research and Innovation

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

Many submissions suggested that Dublin City Council look to Europe for best practice, and link with other NGOs and Organisations to develop innovation.

Chief Executive Response

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

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

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

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

Micro-generation in Dwellings and Non-domestic dwellings

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

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

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

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

In March 2019, the Oireachtas published its '*Climate Change: a cross-party consensus on climate action*' report. The report recommends that the number of solar PV panels permitted without planning permission was restrictive and that this should be addressed, so as to enable increased microgeneration capacity in homes, farms and businesses without the need for planning permission. The report also notes that Ireland must legislate for a re-configuration of the electricity market to make it possible for community-scale projects and private micro-generation "prosumers" (both a producer and consumer of electricity) to be able to sell any surplus electricity back into the grid.

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

Social Housing Upgrades

A number of large projects are in planning to regenerate flat complexes by upgrading the existing buildings, and often adding additional apartments on the site. The upgrade involves not only a deep energy retrofit but also better space standards, better accessibility and better use of external spaces. Feasibility studies carried out for some complexes suggest that upgrading the buildings may be an economic option. At other complexes, it may be more economic to replace the older buildings. These are all deep retrofit projects, exceeding the nearly Zero Energy Building (nZEB) level as defined in the Technical Guidance Document Part L 2017[28] for existing buildings (120 kWh/m²) and aiming for the target of achieving the same energy efficiency as a new building (70 kWh/m²).

Links to Professional bodies

The City Architects' Division of Dublin City Council is committed to participating with Irish Green Building Council, with the RIAI and with Third Level Institutions to continue to develop best practice and introduce innovation in design of buildings and public realm. The City Architects' Division is also linking with European organisations in BUILD UPON 2. This is a project funded under the EU's H2020 programme and will run for two years from May 2019. It will work to develop long-term building renovation strategies, linked to EU and National policy, with the aim of delivering a highly efficient and decarbonised building stock by 2050.

The City Architects Division of Dublin City Council is committed to participating with the RIAI in particular the Sustainability Task Force in seeking new and innovative approaches to Climate action in the built environment:

Geothermal Energy

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

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

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

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

District Heating:

Through the North Lotts and Grand Canal Dock and the Poolbeg Strategic Development Zones, Dublin City Council is developing the Dublin District Heating System (DDHS) to supply low-carbon heat to houses and businesses in these areas. Waste heat will be taken from the Poolbeg Waste-to-Energy Plant and delivered through insulated pipes to the buildings connected to the system, replacing fossil fuel heating systems and therefore reducing air pollution and GHG emissions. This project is a high priority for the council and the city.

Private Landlords

The current legislation [Housing (Standards for Rented Houses) Regulations 2019] in relation to maintaining standards in the private rented sector came into effect on the 1st July 2017. These regulations now require all rooms in a rented property to be provided with adequate heating. Requirements in relation to ventilation continues to be a requirement of the legislation.

Mould growth caused by condensation is an indication that your heating, insulation or ventilation may need improving. The regulations currently have no requirements in relation to energy efficiency. Additional requirements to be addressed in any updated standards legislation include: insulation of walls and roof spaces; double & triple glazed windows; led lighting and improving heating appliance efficiency. Dublin City Council provides information on private rented housing standards on its web site at <http://www.dublincity.ie/housing-and-community-policy-and-initiatives-section/environmental-health>

In addition, a twitter account for disseminating information on private rented standards and for receiving complaints is active at @dccprivaterent or the section can be emailed at privateretned@dublincity.ie

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

Chief Executive's Recommendation

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

New Actions:

Action: The City Architects Division of Dublin City Council is committed to participating with Irish Green Building Council and other European organisations in BUILD UPON 2. This is a project funded under the EU's H2020 programme and will run for two years from May 2019. It will work to develop long-term building renovation strategies, linked to EU and national policy, with the aim of delivering a highly efficient and decarbonised building stock by 2050.

Action: The City Architects Division of Dublin City Council is committed to participating with the RIAI in particular the Sustainability Task Force in seeking new and innovative approaches to Climate action in the built environment:

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

Additional text also proposed

DCC is a partner in a consortium for a project called the 'Geo-Urban' project, whose objective is to identify the geothermal resources available in Dublin, and Vallès in Catalonia, Spain. Geophysical data collected during this project will feed into an economic appraisal of using heat from deep geothermal resources in challenging urban environments like Dublin, and will draw upon existing knowledge and experience from partners in Denmark, where the deep geothermal heat industry is more established. The specific objectives of the project can be listed as follows;

1. Feasibility analysis for commercial geothermal district heating
2. Improved conceptual understanding of the subsurface geology
3. Promotion of geothermal energy as an option for district heating

The aim is to complete this project by the middle of 2021.

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

New Action:

Develop an understanding of deep geothermal resources in Dublin through the GEO-URBAN Project', with the timeframe of 2021, and the indicators being the completion of the 'report', and the target impacted is 'Public Awareness'

Strategic Environmental Assessment of Chief Executive's Recommendation

Actions relating to long term building renovation and new and innovative climate action in the built environment are consistent with a number of SEOs in particular, material assets, climate change and

air quality, population and human health as well as indirect positive effects in relation to cultural heritage and landscape.

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

Appropriate Assessment Screening of Chief Executive's Recommendation

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

The use of LEDs in Public Lighting and in Social Housing:

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

Chief Executive's Response

Dublin City Council Public Lighting Department has already gone to tender for public consultation on its Public Lighting masterplan which is for the whole infrastructure upgrade of the public lighting system within Dublin City Council which will include the retrofitting of public lights to LED.

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

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

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

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

In relation to the query on reducing light levels Dublin City Council uses 'default' dimming on all the LED luminaires procured to reduce the light levels in all areas between midnight and 6am.

With regard to reducing light pollution LED luminaires direct the light to where it is required thus reducing light pollution such as Sky glow and minimising light spill / trespass, through better optical control of light sources. Correctly specified Led luminaires achieve that. Older lamp types such as low pressure sodium lights (orange type lights) throw light in many directions resulting in the Sky glow (orange glow in the night sky) that can be seen over many towns and cities around the country.

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

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

The City Council also have programme of landlord lighting upgrades in social housing complexes where existing lighting is being replaced with LED on a phased basis.

Chief Executive's Recommendation

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

Strategic Environmental Assessment of Chief Executive's Recommendation

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

Appropriate Assessment Comment

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

Embodied Carbon

A number of submissions suggested that embodied carbon should be included in assessment of projects undertaken by the council.

City Architects has set up a departmental working group to examine how Dublin City Council can deliver low carbon and resource efficient residential developments. The project is being undertaken under the internal pilot participatory budget programme.

The group are presently initiating a research study to investigate the Lifecycle Assessment of Traditional and New Construction Methods for Residential Projects in Dublin with a view to formulating initial recommendations by end 2019.

The aim of this study is to quantify the embodied carbon of newly constructed residential developments in Dublin, assessing both traditional and new construction methods of residential building. To achieve this aim, the following objectives are being addressed:

- Raw data relating to the different building designs and construction methods utilised by Dublin City Council will be collated and interrogated to generate a detailed life cycle inventory
- A life cycle assessment of these residential construction projects will be undertaken, with a specific focus on the global warming potential (GWP) impact category which relates to embodied carbon.
- Both 'cradle-to-gate' and 'cradle-to-grave' life cycles will be considered in the study, to allow for the construction and operational stages of the buildings to be examined.
- The data will be analysed and compared, identifying materials or components with high embodied carbon.

The intention is that the study will provide recommendations for modifying our in-house design & specification standards to reduce the embodied carbon footprint of future Dublin City Council residential developments.

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

Chief Executive's Recommendation

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

New Action:

The City Council will undertake a research study to investigate the Lifecycle Assessment of Traditional and New Construction Methods for Residential Projects in Dublin with a view to formulating initial recommendations by end 2019.

SEA Comment

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

Appropriate Assessment Comment

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

Financing Building Energy Upgrades and Public Awareness

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

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

Having regard to the submissions received, it is noted that the Council has a direct remit in retrofitting and refurbishing its own social housing stock, and it is considered that this issue is adequately addressed in the Draft CCAP. At present, the Council does not have a remit or mandated obligation to provide finance or grant support to private sector residential retrofit or refurbishment works.

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

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

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

Chief Executive's Recommendation

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

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

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

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

SEA Comment

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

Appropriate Assessment Comment

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

The impact of the built environment on Birds:

A submission was made seeking consideration of birds in construction, in particular swifts.

Chief Executive's Recommendation

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

New Action:

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

SEA Comment

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

Appropriate Assessment Comment

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

Built and Archaeological Heritage

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

Chief Executive's Recommendations

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

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

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

Additional New Actions Awaiting Budget

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

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

SEA Comment

The above actions focus on cultural heritage in particular. By promoting consideration of these resources and adapting and considering climate change effects stronger protection of these resources are integrated to the Dublin City CCAP. These are identified as generating positive direct interactions with a number of SEOs including Cultural Heritage, Landscape and Climate Change as well as indirect positive effects on population and human health and material assets SEOs. No adverse environmental effects are identified for these CE recommended actions.

AA Comment

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

Table 0.5.6 Action Area: Energy and Buildings - Summary of amendments to actions and new actions

Energy and Buildings Action Number	Recommendation
1	No Change
2	No Change
3	No Change
4	No Change
5	No Change
6	No Change
7	No Change
8	No Change
9	No Change

10	No Change
11	No Change
12	No Change
13	No Change
14	No Change
15	No Change
16	No Change
17	No Change
18	No Change
19	No Change
20	No Change
21	No Change
22	No Change
23	No Change
24	No Change
25	No Change
26	No Change
27	No Change
28	No Change
29	The City Council Energy Review (mid 2019) and going forward, will include a glide path illustrating the energy efficiency and GHG emission targets for the City Council up to and including 2030.
30	Appendix II: Total Emissions in Dublin City of the CCAP, will also be updated every two years in accordance with EU Covenant of Mayors for Climate & Energy protocol.
31	The City Architects Division of Dublin City Council is committed to participating with Irish Green Building Council and other European organisations in BUILD UPON 2. This is a project funded under the EU's H2020 programme and will run for two years from May 2019. It will work to develop long-term building renovation strategies, linked to EU and national policy, with the aim of delivering a highly

	efficient and decarbonised building stock by 2050.
32	The City Architects Division of Dublin City Council is committed to participating with the RIAI in particular the Sustainability Task Force in seeking new and innovative approaches to Climate action in the built environment
33	Identify site for trialling renewable energy projects, including solar PV and Geothermal.
34	The City Council will undertake a research study to investigate the Lifecycle Assessment of Traditional and New Construction Methods for Residential Projects in Dublin with a view to formulating initial recommendations by end 2019.
35	In all building projects, new build or retrofit, Swift Bricks or other nesting sites for swifts will be provided where practicable. The presence of swift breeding sites will be identified to ensure that known breeding sites are not lost as a result of construction work.
36	Develop maintenance and condition survey programmes for Council owned historic and ancient monuments that are informed by climate change impacts.
37	Conduct research and seek to develop City Council based case studies on appropriate and sensitive retro-fitting/energy upgrading of traditional buildings to inform works both to Council owned properties and to guide private owners.

0.5.7 Action Area: Transport

54 actions are outlined under the theme of Transport in Dublin City Councils Climate Change Action Plan 2019-2024. A total of 129 submissions were received to the main Transport Chapter whilst the area was also covered in some of the other more general chapters. The greatest number of submissions related to cycling infrastructure and cycle parking, in particular to the need to incorporate more segregated cycle lanes, but also to improve the maintenance of the lanes, to improve enforcement around cycling and to provide more safe routes to school and training/education of children in good cycling habits. 9 new actions were identified as a result of these submissions and a further 11 were amended to clarify the actions.

Sustainable Transport Measures: Modal transport shift

A number of submissions relate to the Council's role in facilitating modal shift. It is the policy of the Council to re-balance movement priorities towards more sustainable modes of transportation by prioritising the development of safe walking and cycling facilities. Many submissions sought to have the improvement of the public realm, the implementation of traffic free areas, better signalling, the extension of 30km zones and better overall enforcement included in the draft CCAP. Submissions were received seeking to have the introduction of congestion charging, the elimination of fossil fuel vehicles in the City and increases in current parking charges in general included in the draft CCAP. Submissions also sought the elimination of car parking in accessible developments and restrictions in council car parking. Also submitted were requests to include in the draft CCAP that the City Council make car sharing mandatory in new developments.

Chief Executive's Response

Dublin City Council recognises the importance of high quality public realm not only in contributing to the vibrancy and vitality of the city but also in encouraging more walking and cycling. Dublin City Council's Public Realm Strategy 'Your City Your Space' 2012 and 'The Heart of Dublin' Public Realm Masterplan for the City Core 2016 – seek to improve the quality and experience of Dublin's public realm and to make Dublin a more pedestrian friendly city. Dublin City Council is committed to deliver on these strategies. Several public realm schemes for the city centre are being progressed through the part 8 process. These will deliver more liveable streets, more pedestrian connectivity and space and will provide more opportunities for people to linger and interact with the city.

Dublin City Council recognises the multi-faceted benefits that result from high quality Public Realm and will continue to work to deliver the strategy and realise these benefits.

Actions 16 to 19 address specific projects relating to the improvement of the public realm.

The Council is committed to implementing traffic free areas, however all such schemes must follow the planning and consultation process to ensure that the views of all users of the spaces are considered, together with accessibility and mobility considerations.

Action 11 and 12 commit the Council to expand the 30km zones and to carry out a public awareness campaign on these. This would include liaising with the Gardaí.

DCC policy is to follow the hierarchy of walking, cycling and the use of public transport. This policy informs all transport infrastructure projects. The priority is to encourage a modal shift in the first

instance. The Council will seek to implement emission linked charging in certain areas of the city to encourage a shift to non-fossil fuel vehicles through Action 37. The publication of the All of Ireland Plan may lead to additional measures in this area and the City Council will include any actions emanating from this plan that may support this Policy. There are also increases imminent for central city parking.

Access to car parking by staff at civic offices is already restricted. It is considered that reallocation of car parking to sustainable mobility in the form of increased and improved cycle parking, shower and changing facilities in tandem with the development of a mobility hub would be more effective in achieving mode shift for employees. The Council are thus introducing a smart mobility hub in the Civic Offices (Action 5)

Dublin City Council, since the early 2000s, has had Maximum Accessibility Based Car parking Standards which permit fewer car parking spaces in accessible locations. A maximum of one employee in 40 is permitted to park in zone 1. This policy coupled with proactive mobility management and requirement for high quality end of trip facilities has been instrumental in increasing sustainable mode share for work in the city to 71%.

Car parking for residential development is a much more complex matter. Dublin City Council aspires to have people of all ages and abilities including families, living in the city. Car parking can influence choice in this matter. It is considered more sustainable to have people living in the city centre close to work and services rather than moving to outlying areas and then commuting into the city by car. In Dublin City, car ownership does not equate to car usage. Car storage is a difficult challenge and where new apartment developments do not provide an appropriate level of car parking then overspill into adjacent areas can result in parking on footpaths etc. which degrades the pedestrian environment.

Notwithstanding the above, DCC works with developers on a site by site basis to develop bespoke mobility strategies for each residential development. These strategies are based on an integrated approach to car parking, cycle parking, shared car and cycle mobility, mobility management and connectivity to public transport. To date permission has been granted for parking ratios ranging from 0.3 per unit to 0.7 per unit depending on location. Car sharing may be a response by residents in these locations

It is the policy of the Council to re-balance movement priorities towards more sustainable modes of transportation by prioritising the development of walking and cycling facilities within a safe and traffic calmed street environment. The Dublin City Centre Transport Study referenced in the draft CCAP, sets out a number of individual scheme proposals that will enhance the public realm

In order to create a more sustainable city, the development plan, in accordance with national policy, places emphasis on the need for a modal shift from motorised private modes of transport towards public transport, cycling and walking. This requires improvements to both the current public transport network and to facilities for pedestrians and cyclists. Dublin City Council will work with the emerging strategy of the National Transport Authority and supplement it with supporting local improvements, particularly to the city centre environment through the implementation of the public realm strategy and locally focused objectives. A pro-active approach is taken to influencing travel

behaviour. In addition traffic restrictions will be implemented within the city centre in order to give greater priority to more sustainable modes.

A mixed-use, sustainable approach to city living, with an emphasis on quality, compact neighbourhoods, transcends the land-use zoning and over-arching policies of the plan. The plan pursues a sequential approach to securing modal shift from private motorised modes of transport to more sustainable modes including walking, cycling and public transport and Vision and Core Strategy.

Sustainable forms of transport such as public transport, walking, and cycling are strongly promoted in this plan, which takes a pro-active approach to influencing travel behaviour and effective traffic management. These are seen as important elements of a progressive policy that can contribute to climate change mitigation and a more sustainable city. A crucial factor in the discussion of movement and transport is the challenge of tackling climate change. Changing the mode share of commuters towards sustainable options is a key requirement, and during the period 2006–2014, use of the private car decreased by 17% and the proportion of cyclists entering the city increased by 114%. Incremental improvements to strategic cycle-ways have much improved the cycling environment and further enhancements are planned. The walking share target of 10% was exceeded over the period of the last development plan

Pro-active traffic management is an ongoing requirement, and Dublin City Council has sought to limit the growth of peak hour traffic within the canal cordon. This is achieved by restricting through-traffic and calming traffic generally within the city centre, and to give increased levels of priority for pedestrians, cyclists and public transport, along with associated improvements to public realm.

This will result in a reduction in pollution and greenhouse gas generation, so helping to mitigate climate change. The aim is to tackle these issues holistically so as to facilitate continued economic activity while reducing vehicular congestion and improving air quality, so having a positive impact on health.

Through its City Development Plan, it is an Objective of Dublin City Council:

MTO44: To tackle the adverse environmental and road safety impacts of traffic in the city through measures such as:

The implementation of traffic calming measures including the restriction of rat runs in appropriate areas in accordance with best practice and following advice contained in the Design Manual for Urban Roads and Streets.

MTO45: To implement best practice in road design as contained in statutory guidance and in the DMURS (the use of which is mandatory) with a focus on place-making and permeability (for example, by avoiding long walls alongside roads) in order to create street layouts that are suited to all users, including pedestrians and cyclists.

The City Council has implemented a scheme at Walsh Road Drumcondra and is currently trialling a scheme at Mount pleasant Ave in Rathmines.

Last Mile delivery, Smart Technology

Submissions were received seeking to have the promotion of the use of electric bikes both by Council staff and in general be included in the Draft CCAP and the extension of last mile delivery scheme. Submissions also sought to include the consideration and use of smart technology both in general and with regard to e-scooters and to apps that monitor loading vehicles. Submissions were also concerned that regulation keep pace with new technology.

Chief Executive's Response

Dublin City Council is currently planning to develop a number of delivery hubs that will enable trucks and vans to drop off goods at certain points instead of travelling all the way into the City Centre in order to carry out last mile deliveries by bike and walkers. Dublin City Council will continue its commitment to promoting cycle logistics through its continued engagement with the logistics sector. It is also committed to last mile deliveries by bike and by walkers through facilitating further city centre delivery hubs. To complement this initiative, the Smart Dublin programme has also launched an all-island joint Small Business Innovation Research (SBIR) challenge involving Dublin City and Belfast City Councils. Both cities are looking for ways to enhance the efficiency and effectiveness of these deliveries, reducing the number of goods vehicles in their respective urban centres, which, in turn, will improve air quality, noise pollution and road safety. Action 15 addresses this. Action 5 addresses the introduction of a smart mobility hub in the Civic Offices whilst Action 54 seeks to promote Mobility as a service (MaaS) As part of the MaaS framework, any instruments to nudge behaviour away from single passenger car usage will be explored.

Chief Executive's Recommendation

It is recommended that the following amendment is made to the Draft CCAP.

Additional Text proposed:

The Dublin City Transport Study sets out a number of individual scheme proposals that will provide a basis upon which to reconfigure the physical layout of the core City Centre area, thereby providing a basis for an enhancement of the public realm and facilitating the delivery of a core pedestrian network.

SEA Comment

Additional text only and no significant environmental effects are identified for this CE recommendation.

Appropriate Assessment Comment

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

Infrastructure and Behaviour Change

A number of submissions identified the need for the Draft CCAP to include proposals for segregated and linked cycle facilities and referenced Continental examples of such facilities. The maintenance of

the infrastructure was also raised in particular after severe weather events. The submissions stated that such infrastructure offers improved safety, health, reduced obesity and general wellbeing advantages in addition to reducing congestion, the use of fossil fuels and improving air quality. Reference was also made to the large increase in numbers cycling in recent years (157% since 2006) and the requirement to provide additional facilities and the fact that increasing the length and quality of infrastructure and the availability of safe and secure parking will accelerate the modal shift from cars to bikes. The Liffey cycleway was mentioned in several submissions. The use of quiet streets for new cycle ways, the extension of safe routes to school, proposals to remove car parking to make way for cycleways and the examination of allowing contra flow cycleways were also received.

Submissions were received requesting that an increase in the number of bike parking facilities and the expansion of the Dublin Bike scheme be included in the Draft CCAP on the basis that this would encourage a greater modal shift and give a sense of security to cyclists who are reluctant to park their bikes in the City. Submissions also sought to have targets included in the Draft CCAP for cycling infrastructure, modal shift and cycle parking and the inclusion of a baseline against which to measure progress.

Many submissions related to the need for the draft CCAP to identify the engagement with, and the development of partnerships with, communities; cycling groups; external stakeholders such as the Gardaí; businesses, and third level institutions, and to hold public consultations.

Chief Executive's Response

Dublin City Council recognises the contribution of transport to CO₂ emissions and has worked for the last two decades to encourage a shift to sustainable travel. Policies to better integrate land use and transportation, to discourage private commuting and to encourage active travel and public transport use have been embedded in city development plans since the early 2000s. In more recent years, DCC has recognised the importance of working collaboratively with communities, employers, schools and other stakeholders to bring about positive changes in travel behaviour. Innovative solutions are also encouraged, for example the promotion of shared mobility options such as car and bike share. Increasingly the quality of the public realm is being recognised as an important factor in encouraging active travel. This strong policy focus, coupled with improvements in public transport and cycling infrastructure, has brought about a significant shift from private car commuting in the city. Currently over 71% of people coming into the city in the morning are travelling sustainably.

DCC policy is to follow the movement hierarchy of walking, cycling and the use of public transport. This policy informs all transport infrastructure projects. This includes all those listed in the Draft CCAP and informs the overall context of the Draft CCAP. It also informs planning in the city.

Additionally the Greater Dublin Cycling Network sets out a vision for a cycling network in the Dublin Area and Dublin City Council is committed to rolling out this network as resources and funding become available.

An example is the segregated route for cyclists along the Grand Canal on Dublin's south side. This canal route is designed to be used by everyone from novice bike riders to cycling commuters and kerbs along the path separate cyclists from vehicles and pedestrians. It has nine junctions where cyclists share the route with other road users and where new traffic signals were installed with

dedicated cycle phases. This is the first time these signals have been used in Ireland. Cyclists and pedestrians cross the junction on their signal.

At these junctions a new 'nested Pelican' sequence was introduced so that during the flashing green man phase, cyclists were provided with a flashing amber signal. Legislation was introduced to allow this type of operation along with the legal requirement for cyclist to give way to pedestrians during this part of the sequence.

In order to minimise conflict between pedestrians and cyclists, and to eliminate the need for cyclists to ride over tactile paving, the waiting areas for pedestrians and cyclist were segregated. In addition, CCTV is installed at each junction to allow traffic management and an element of security for cyclists and pedestrians as all the Council's traffic cameras are shared in real time with An Garda Síochána.

Dublin's Canal Way Cycle Route has proved very popular with cyclists and demonstrated that a high quality route will attract additional cyclists.

The council has installed smart technology at a few locations where cyclists have to make difficult turns. At the junction of St Stephen's Green East and Merrion Row, where cyclists turn right, the radar detects cyclists being rushed by cars coming from St Stephen's Green North.

The technology was also applied at the junction of Chesterfield Avenue and Conyngham Road, at the entrance to Phoenix Park. It works by extending the amber period from six to ten seconds when cyclists are detected, to allow them to clear the junction before cars enter it. The technology only activates the extended light sequence when cyclists are there. At other times, the traffic light sequences run as normal.

The junction of Guild Street and Sherriff Street is another location using the extended light sequence. The plan is to use the detection system to give cyclists a head start at traffic lights. So by giving the cyclist an advance start, it gives them the opportunity to clear the traffic, go ahead of buses, and be more visible.

Dublin City Council are looking to deploy these city-wide in order to improve overall safety for cyclists.

The City Council recognises the climate impact of the number of fossil fuel vehicles accessing the City and is committed to a modal shift that will reduce congestion, improve air quality, enhance the living environment and promote healthy living. The City Council is also committed to constructing and maintaining infrastructure to a high standard

In recent years the City Council has developed a collaborative approach with Green Schools whereby children audit their routes to schools, identify issues such as the need for pedestrian crossings, wider footpaths or signage which DCC then endeavours to address. This approach takes the safe routes to school much further as it addresses the physical barriers to walking/cycling to school. Community Street Audits are a way to evaluate the quality of streets and spaces from the viewpoint of the people who use them, rather than those who manage them. They involve small groups of local residents, traders, Councillors and officers to assess a route on foot, following which a detailed report is produced with recommendations.

Streets and public spaces are most successful when residents have the opportunity to influence decisions about them, and effective involvement is a sure fire way to reap the benefits of a good

community relationship. Quiet streets are something that the City Council remains committed to develop in order to create neighbourhoods that facilitate a high quality of life.

Dublin City Council is committed to this approach and existing actions 27 to 34 deal with specific cycleways, whilst Action 13 addresses the maintenance of the infrastructure

Chief Executive's Recommendation

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

New Text:

Partnerships, Community Engagement, Communication and Promotion

Partnerships

Since 2010, DCC has been developing and implementing successful behavioural change programmes to encourage more sustainable forms of transport. For example, the safe routes to school scheme and the Green Schools programme, in partnership with An Taisce, are encouraging thousands of children and their parents to walk, cycle or scoot to school. DCC will continue to seek new and expand on existing partnerships to encourage sustainable travel and safer travel behaviours.

Community Engagement

Dublin City Council will engage with local communities to develop a vision for the future of their neighbourhoods with a strong focus on local living, sustainable mobility and quality of life. Hike It! Bike It! Like It! Drimnagh set up in 2011 in partnership with the Drimnagh Smarter Travel Community Campaign. It aimed to promote active travel to local schools and to the staff of Crumlin Children's Hospital. The project has resulted in a 52% increase in people cycling to work or school in the Drimnagh area. Local schools have also recorded a large increase in the number of students walking to school, with almost 70% of students now travelling on foot each day. The project was a finalist in both the 2013 Green Awards and the Excellence in Local Government Awards.

Communications and Promotion

DCC will establish a portal dedicated to communication and promotion of active travel within existing platforms.

Research and Innovation

Participation in European Commission Research Programmes

DCC aspires to be a Future Cycling City and will collaborate with cycling cities of Amsterdam, Copenhagen and Munich to learn and share experiences in the development and promotion of cycling infrastructure. DCC will collaborate with Transport for Greater Manchester and Edinburgh in benchmarking the city's status on sustainable mobility using EC Sustainable Urban Mobility Indicators. This collaboration will leverage on European Commission Programmes. DCC will also lead local innovation and research programmes and encourage citizens and business participation in the development and deployment of sustainable transport solutions.

City Challenge – Walking and Cycling

DCC will embark on a City Challenge that seeks to generate interest in the development of cycling and walking infrastructure and to foster the development of creative and appropriate infrastructure

and engagement solutions that are aligned with the Dublin context conditions. This will be carried out using the BETA framework.

Smart Dublin Cycling Challenge

Dublin City Council will seek smart solutions to mobility problems using Smart Dublin programme. An example is as the Smart Dublin cycling challenge which was launched in 2016 to help improve cycling across Dublin using smart technology. The challenge resulted in the development of BikeLook, which monitors bicycle usage and deters and detects bicycle theft; Fluidedge, which allows cyclists to record actual or perceived obstacles to aid safe cycling in Dublin, a See.Sense ICON intelligent and connected bicycle light, which collects anonymised, crowd-sourced data such as road surface conditions, collisions and near-miss hotspot areas, and a Smartcharge, which aids cyclists in predicting the ease of a journey, improving safety along the way and creating a secure parking facility at the end of the journey.

Infrastructure

Cycle Network and Walking

DCC will accelerate the delivery of cycling and walking infrastructure with continuous segregation of vehicles and high levels of perceived safety. The Greater Dublin Area Cycle Network Plan has identified 471km of a possible cycle network for Dublin City. DCC will focus on the development of the greenways, primary and secondary routes while significantly improving the walking environment and creating opportunities for sojourning along the same corridors. There are 60 kilometres of segregated cycling tracks and pedestrian routes currently under planning and development for delivery over the next five years. Routes under planning and development include the Liffey Cycle Route, East Coast Trail, Dodder Greenway, Royal and Grand Canal Greenways and the Clontarf-to-City Centre.

New Action 56

East Coast trail (10.8km in DCC area)

SEA Comment

It is understood that preliminary baseline ecology surveys are taking place with Dun Laoghaire Rathdown as the lead local authority.

Subject to full implementation of existing measures in the CCAP, Dublin City CDP, SEA ER and NIS no adverse effects are identified.

AA Comment

The provision of an East Coast Trail will have the potential to result in interactions with European Sites that could result in negative effects to the qualifying habitats and/or qualifying species for which these sites are designated.

A range of mitigation measures are outlined in the draft CCAP and these measures should be implemented as a basis to ensure that adverse effects to these European Sites are avoided during the design, construction and operation of the East Coast Trail.

The NIS of the draft CCAP identified actions providing for the development of walking and cycling networks within the Plan area as having the potential to result in likely significant effects to European Sites. The NIS provides for a range of mitigation measures that will minimise the environmental impact of such walking and cycling infrastructure and will eliminate the potential for adverse impacts to European Sites. Provided all mitigation measures as outlined in the NIS of the draft CCAP are implemented, the inclusion of this additional action will not have the potential to result in likely significant effects to European Sites.

Cycle Parking

Dublin City Council has drafted a strategy for the provision of public cycle parking throughout the City. Since 2018, 2,100 cycle parking spaces have been provided at 110 locations and a further 2,000 spaces are proposed to be installed in 2019 at over 120 locations. Further installations will be made to provide over 20,000 public parking spaces by 2030.

DCC has had immense success with the dublinbikes scheme and there is continuous demand to expand this programme, which will help to reduce emissions and provide more options for sustainable modes of transport. DCC will continue to monitor its performance and any expansions will take account of emerging business models for bike sharing. Another bikesharing scheme Bleeper Bike is also successfully operating in the city.

DCC will also work with relevant transport bodies and businesses to expand the availability of sheltered bicycle parking to enable people to cycle to and from key public transport nodes, and strategic destinations such as the recent installations for Drury Street bike parking facilities.

Upgraded Cycle Parking Facility Opens in Drury Street Car Park

A newly expanded cycle parking facility was opened in Drury Street Car Park in June 2018. The newly expanded facility which was funded with the support of the National Transport Authority has a capacity for 332 bicycles, almost twice the capacity of the original facility that opened in the car park in 2009. During the upgrade of the cycle facility, new lighting and CCTV security cameras were installed and fire alarms and fire exits were upgraded. Also for the first time in a cycle facility in Dublin city, a public bicycle maintenance area with basic tools will be provided and parking will be available for cargo bicycles.

The new secure cycling facility is free to use and it is open Monday to Thursday from 7am to Midnight, Friday, 7am to 1am, Saturdays, 8am to 1am and Sundays 10am to 7pm

Amend Action 27: Develop Cycling Action Plan: 471 km of a possible cycle network.

Cycle Network and Walking and targets

DCC will accelerate the delivery of cycling and walking infrastructure with continuous segregation of vehicles and high levels of perceived safety. The Greater Dublin Area Cycle Network Plan has identified 471km of a possible cycle network for Dublin City. DCC will focus on the development of the greenways, primary and secondary routes while significantly improving the walking environment and creating opportunities for sojourning along the same corridors.

Amend Action 38: Bike Parking and targets

Actions: Dublin City Council has drafted a strategy for the provision of public cycle parking throughout the City. Since 2018, 2,100 cycle parking spaces have been provided at 110 locations and a further 2,000 spaces are proposed to be installed in 2019 at over 120 locations. Further installations will be made to provide over 20,000 public parking spaces by 2030.

DCC will also work with relevant transport bodies and businesses to expand the availability of sheltered bicycle parking to enable people to cycle to and from key public transport nodes, and strategic destinations such as the recent installations for Drury Street bike parking facilities.

DCC will reassess cycle parking standards for developments as part of the review of the Dublin City Development Plan 2016-2022.

SEA Comment

This proposed amendment provides for positive interactions with a range of SEOS namely climate change, air quality, material assets, population and human health. Subject to the implementation of relevant measures in the Dublin City CDP, CCAP, SEA ER and NIS no adverse environmental effects are identified.

AA Comment

The NIS of the draft CCAP provides a range of mitigation measures that will eliminate the risk of adverse impacts to European Sites as a result of the development of infrastructure associated with cycling infrastructure. The implementation of these measures will ensure that the inclusion of this action will not have the potential to result in likely significant effects to European Sites

Amend Action 39: Bike Sharing

DCC has had immense success with the dublinbikes scheme and there is continuous demand to expand this programme, which will help to reduce emissions and provide more options for sustainable modes of transport. DCC will continue to monitor its performance and any expansions will take account of emerging business models for bikesharing.

DCC has facilitated the expansion of bike share options through the creation of Bye Laws in 2017 for the operation of Stationless/Dockless bike share schemes. Current operator Bleeperbike now covers areas of the city not included in the Dublinbike Scheme making bike share an option for a wider population.

DCC will seek an expansion of the bike sharing programme by a further 1150 bikes by the end of 2019. This expansion will also seek to include e-bikes

SEA Comment

This action relates to research and collaboration, no landuse effects identified at this juncture.

AA Comment

This action to promote bike sharing within the plan area will not have the potential to result in likely significant effects to European Sites.

New Action 57:

Interreg, Building an Ecosystem to generate opportunities in Open Data (BE GOOD) Challenge led project to promote the safe wellbeing of the City and improvements in public transport services

SEA Comment

This action relates to research and collaboration, no landuse effects identified at this juncture.

AA Comment

This action relates to research and collaboration, no landuse effects identified at this juncture and there will be no potential for this action to result in likely significant effects to European Sites.

New Action 58: *Participation in European Commission Research Programmes*

DCC aspires to be a Future Cycling City and will collaborate with cycling cities of Amsterdam, Copenhagen and Munich to learn and share experiences in the development and promotion of cycling infrastructure. DCC will collaborate with Transport for Greater Manchester and Edinburgh in benchmarking the city's status on sustainable mobility using EC Sustainable Urban Mobility Indicators. This collaboration will leverage on European Commission Programmes. DCC will also lead local innovation and research programmes and encourage citizens and business participation in the development and deployment of sustainable transport solutions.

SEA Comment

This proposed amendment provides for positive interactions with a range of SEOS through research and collaboration indirect positive interactions with climate change, air quality, material assets, population and human health. No adverse environmental effects are identified.

AA Comment:

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

New Action: Baseline

Create a baseline of Sustainable Urban Mobility for Dublin in line with EC Indicators

SEA Comment

As with the preceding action, this action relates to research and baseline. Collation of such baseline information is essential to understanding trends with transport and mobility a critical issue. No landuse effects are identified and no adverse environmental effects are identified.

AA Comment

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

New Action: Linking with and training schools

DCC participates in the national Cycle Right programme bringing cycle training to pupils in primary and secondary schools throughout the city area. DCC works closely with An Taisce Green Schools on

the Green Travel theme and encourages increased cycling through support for cycle training, on site cycle parking and improvements to the physical environment identified by pupils.

Cycle Training Programme for 6th Class students / Pedal Power Labs

SEA Comment

Action that promotes and encourages a modal shift is positive in relation to SEOs including population and human health, climate change and material assets.

AA Comment

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

New Action: Partnerships

DCC will continue to seek new and expand on existing partnerships to encourage sustainable travel and safer travel behaviours.

New Action: Community Engagement

Dublin City Council will engage with local communities to develop a vision for the future of their neighbourhoods with a strong focus on local living, sustainable mobility and quality of life.

New Action: Communications and Promotion

DCC will establish a portal dedicated to communication and promotion of active travel within existing platforms.

SEA Comment

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

AA Comment

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

Air Quality

A number of submissions related to the impact of traffic on air quality and its links with health:

Chief Executive's Response

DCC is working in partnership with the EPA on expanding and enhancing ambient air quality monitoring in Dublin in accordance with the National Ambient Air Monitoring Programme.

Data from all monitoring stations in the Dublin region can now be viewed in real time on the EPA website at <https://www.epa.ie/air/quality/data/>

Further enhancements planned include improved communication and interpretation of air quality data on the Dublin City Council website.

Chief Executive's Recommendation

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

New text

DCC is working in partnership with the EPA on expanding and enhancing ambient air quality monitoring in Dublin in accordance with the National Ambient Air Monitoring Programme . Data from all monitoring stations in the Dublin region can now be viewed in real time on the EPA website at <https://www.epa.ie/air/quality/data/>

Further enhancements planned include improved communication and interpretation of air quality data on the Dublin City Council website.

New Actions

- (i) DCC is working in partnership with the EPA on expanding and enhancing ambient air quality monitoring in Dublin in accordance with the National Ambient Air Monitoring Programme
- (ii) DCC is exploring the feasibility of carrying out an air quality status study in Dublin port

SEA Comment

Actions relating to air quality monitoring are positive particularly as they can be used to provide a baseline and monitoring regime for air quality trends. This is consistent with a number of SEOS including population and human health, climate change and material assets. Indirect longer positive effect should the monitoring result in actions that improve air quality with accompanying benefits for biodiversity, human health, water and climatic factors.

AA Comment

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

Public transport:

Submissions were received seeking improved traffic management signalling for public transport.

Chief Executive's Recommendation

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

Additional Text:

Dublin City Council provides city wide bus priority via a Centralised Bus Priority application that monitoring the progress of buses in service through the city and provides bus priority by interfacing with the Traffic Signal Management System. This innovated data driven application provides a means of improving bus journey times and provide a quantifiable means of measuring the improvements to the bus service.

SEA Comment

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

Appropriate Assessment comment

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

Increased Public Transport Capacity

A number of submissions request increased public transport capacity. The Council has no direct role for the increase in public transport provision. This is a role for the National Transport Authority (NTA) and the Department of Transport tourism and Sport. The Council is working closely with NTA on the Bus Connects project to provide a better quality bus and cycling infrastructure.

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment comment

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

Bus Connects Project

A number of submissions were received regarding the Bus Connects Project.

Chief Executive's Response

The NTA are managing this project and are conducting a public consultation process on the Bus Connects Plans. The Local Authority is a stakeholder in this process. Action 22 commits the City Council to liaise with the NTA on the BusConnects Programme.

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment comment

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

Park and Ride facilities

A number of submissions requested additional and improved Park and Ride facilities (for example in conjunction with LUAS and Rail stations). These facilities are planned under the NTA Bus Connects programme and as such are outside the remit of the local authority.

Under the Bus Connects programme the NTA has committed to improved park and ride facilities¹. As part of BusConnects, a network of park and ride facilities will be developed at key locations along the radial road network. At each location, the NTA is planning a high frequency bus service, primarily availing of the redesigned bus network. Where supplementary services are needed to ensure a comprehensive operation, these will be provided. Parking charges and bus fares will be integrated, ensuring a seamless connection between the parking facility and the bus system. The Council will work with the NTA on this programme.

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

Electric Vehicle Charge Points

A number of submissions related to the demand for additional electric vehicle charge points for use by the public and more clarification on where and how many there will be.

The recent report of the Joint Committee on Climate Action "*Climate Change: A cross party consensus for Action*" makes a number of recommendations in relation to electric vehicle infrastructure. It is understood that measures related to the increased uptake of electric vehicles including charging infrastructure will be included in the All-of-Government climate action plan to be

¹ <https://www.busconnects.ie/initiatives/leave-the-car/leave-the-car/>

completed in 2019. A number of Dublin Local Authorities and the Dublin Climate Action Regional Office (CARO) sit on the recently established Low Emission Vehicles, Working Group 3 chaired by the Department of Housing Planning and Local Government (DHPLG). Outputs from the national group will inform the roll out of EV charge points by LAs and other organisations across the country as well the planning, infrastructural and legislative issues that need to be taken into account in this roll out.

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

The Council has started the transition of its own fleet to electric / low emission vehicles and will continue this transition in its fleet as appropriate vehicles and technologies emerge on the market. EV charge points for council vehicles have been installed at different council locations to facilitate this transition.

Chief Executive's Recommendation

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

New Action:

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

SEA Comment

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

Appropriate Assessment comment:

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

Electric Vehicle Grants

A number of submissions were made requesting increased and continued electric vehicle grants.

Chief Executive's Response

The council has no role in the provision of electric vehicle grants. A range of grants for private and commercial vehicles is available from the Sustainable Energy Authority of Ireland (SEAI) through funding from the Department of Communication Climate Action and Environment (DCCAE)². It is also noted that a recommendation from the recent report of the Joint Committee on Climate Action recommends increased grants for uptake of electric vehicles. The Council has started the transition of its own fleet to electric / low emission vehicles and will continue this transition in its fleet as appropriate vehicles and technologies emerge on the market.

² <https://www.seai.ie/grants/electric-vehicle-grants/>

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment comment:

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

Bike to work scheme

A number of submission were received on the success of the bike to work scheme and recommended that the Council increase the allowance for the scheme.

Chief Executive's Response

The council has no role in increasing the allowance for the bike to work scheme. The Cycle to Work Scheme is a government funded tax incentive scheme, which aims to encourage employees to cycle to and from work. The Council encourages its own staff to take up the bike to work scheme as a tax allowance and provides bicycle facilities for staff to use at its main offices. The council also licences bicycle sharing schemes such as Dublin Bikes and Bleeper bikes for public use.

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment comment:

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

Dublin Airport/Aviation transport emissions

A number of submissions outlined the contribution of the aviation sector on the emissions in Dublin and its impact on climate change.

Chief Executive's Response

The council acknowledges the role of the aviation sector in national greenhouse gas emissions. The council has no role in the regulation or operation of airport flight activities. The role of Dublin Airport in addressing climate change is within the remit of the Dublin Airport Authority and the Irish Aviation Authority and the Department of Transport Tourism and Sport (DTTAS).

The government policy on aviation activities is articulated in the 2015 policy document "A National Aviation Policy for Ireland³" prepared by DTTAS. Emissions from the aviation sector were brought under the scope of the EU Emission Trading Scheme (ETS) in 2008.

The Department of Communications, Climate Action and Environment and the Department of Transport, Tourism and Sport work collaboratively to address the environmental impact of aviation. Both Departments are fully committed to pursuing an agenda in favour of reducing emissions and have worked to ensure that Ireland makes an informed contribution to discussions relating to development of EU-ETS Aviation and also the ongoing development of the International Civil Aviation Organisation (ICAO)'s Global Market Based Measure scheme, known as CORSIA. The National Aviation Policy reinforces Ireland's commitment to the development of a sustainable, resource efficient aviation sector. For example, Ireland will provide an update to the National Action Plan for Aviation Emissions Reduction to ICAO in April 2019 outlining actions underway and planned by the aviation sector to reduce emissions related to international aviation.

A sectoral climate adaptation plan is also being prepared by DTTAS and will include the aviation sector. It is understood that a draft of the sectoral plans will go on public consultation in early summer 2019 and will be submitted to government by end September 2019 as required under the National Adaptation Framework.

The recent report of the Joint Committee on Climate Action "*Climate Change: A cross party consensus for Action*" also makes a number of recommendations in relation to aviation emissions. The Government has published the Draft National Energy & Climate Plan 2021-2030 (NECP). This first draft of the NECP takes into account energy and climate policies developed to date, the levels of demographic and economic growth identified in the Project 2040 process and includes all of the climate and energy measures set out in the National Development Plan 2018-2027. It is the first step in the process of putting together the final National Energy and Climate Plan and further iterations of the plan will take into account additional policies and measures and the All-of-Government Climate Action Plan to be completed in 2019. A final version of the NECP will be submitted to the European Commission by 31st December 2019.

Chief Executive's Recommendation

It is recommended that no further amendment is made to the CCAP based on this issue.

SEA Comment

³ <http://www.dttas.ie/sites/default/files/publications/aviation/english/national-aviation-policy-ireland/national-aviation-policy-ireland.pdf>

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

Appropriate Assessment comment:

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

Bus Technology – Electrification

A number of submissions outlined that the bus fleet should be electrified to prevent emissions.

Chief Executive's Response

The Council has no role or budget in the choice of technology for the public transport used in its jurisdiction. This role is mandated to the National Transport Authority (NTA) and funding provided by public bus fleets from central government through DTTAS. The Government's *Project Ireland 2040*⁴ commits to ending the purchase of diesel-only buses from July 2019 for all our urban bus fleets.

The proposed NTA Bus Connects project states that full conversion of the bus fleet to low emission vehicles will be complete by 2030. A series of low-emission bus trials is under way in Dublin and Cork, funded through the DTTAS green public transport fund and with support from multiple agencies, including the National Transport Authority, Dublin Bus and Bus Éireann. It is expected that the trials will conclude in April 2019. A final report will be produced which will further inform the best lower-emission option, or options, for services in the greater Dublin area and in the regional cities in the years ahead. In addition to this, a number of double-deck diesel-electric hybrid buses will shortly be delivered to Dublin Bus for a trial, which will allow for a comparison of various manufacturers' offerings. Complementing those trials, the NTA will soon commence a tender process for the purchase of diesel-electric hybrid buses as part of 2020 bus purchase programme.⁵ Dublin City Council has started the transition of its own fleet to electric / low emission vehicles and will continue this transition in its fleet as appropriate vehicles and technologies emerge on the market. It is also noted that a recommendation from the report of the Joint Committee on Climate Action was that the NTA should investigate further the range of eco transport technologies that are currently in use, or under development, in other countries such as semi-hybrid solar buses in Norway with a view to identifying opportunities for adaptive retrofit and/or new vehicle introduction into public rolling stock replacements over the coming decade.

Chief Executive's Recommendation

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

⁴ <https://www.gov.ie/en/campaigns/09022006-project-ireland-2040/>

⁵ <https://www.kildarestreet.com/debates/?id=2019-02-12a.456&s=speaker%3A88>

SEA Comment

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

Appropriate Assessment comment

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

Air Pollution from older bus fleet

A number of submissions outlined that the bus fleet contribute to air pollution within the city.

Chief Executive's Response

It is acknowledged that fossil fuelled vehicles public and private are sources of air pollutants and greenhouse gases. The Council has no role or budget in the choice of technology for the public transport used in its jurisdiction. This role is mandated to the National Transport Authority (NTA) and funding provided by public bus fleets from central government through DTTAS. The Government's *Project Ireland 2040*⁶ commits to ending the purchase of diesel-only buses from July 2019 for all urban bus fleets.

It is noted that through the support of the Green Public Transport Fund that the National Transport Authority, in partnership with Department of Transport, Tourism and Sport, Dublin Bus and Bus Éireann has launched a Low Emission Bus Trial in Dublin and that some of these vehicles being tested are older vehicles whose exhausts emission have been retrofitted to provide emissions improvements. The council supports this trial as well as the retrofitting of vehicles to reduce air pollutants from these vehicles. Retrofitting some of the existing bus fleet is a cost effective and proven method of reducing emissions and the consequent health impact of air pollutants from public transport vehicles. Transport for London (TfL) have invested significantly in such retrofit programmes in recent years with success in the UK⁷.

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment

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

⁶ <https://www.gov.ie/en/campaigns/09022006-project-ireland-2040/>

⁷ <http://www.airqualitynews.com/2017/06/28/86-1-million-london-bus-retrofit-programme-announced/>.

Table 0.5.7 Action Area: Transport - Summary of amendments to actions and new actions

Transport Action Number	Recommendation
1	No Change
2	No Change
3	No Change
4	No Change
5	No Change
6	No Change
7	No Change
8	No Change
9	No Change
10	No Change
11	No Change
12	No Change
13	No Change
14	No Change
15	No Change
16	No Change
17	No Change
18	No Change
19	No Change
20	No Change
21	No Change
22	No Change
23	No Change

24	No Change
25	No Change
26	Amend Text: Set up partnership and create a communication engagement and promotions platform
27	Amend Text: Develop Cycling Action Plan: 471km identified
28	No Change
29	Amend: Clontarf to cycle centre Cycle (2.7km)
30	Amend: Liffey Cycle route (6.8km)
31	Amend: Fitzwilliam Cycle route (1km)
32	No Change
33	Amend: Royal Canal Greenway (7.5km)
34	Amend: Grand Canal Greenway (4.4km)
35	Amend: Docklands Bridges
36	No Change
37	No Change
38	Amend: Include target of 2000 in 2019 with a final target of 20,000 by 2030
39	Amend: Expand by 1150 by end of 2019 and include e-bikes
40	No Change
41	No Change
42	No Change
43	No Change
44	No Change
45	No Change
46	No Change
47	No Change
48	No Change

49	No Change
50	No Change
51	No Change
52	Amend: The Council will undertake an assessment of the number of existing and potential future Electric Vehicle Charge points in its jurisdiction and expand the availability.
53	No Change
54	No Change
55	New Action: Create a baseline of Sustainable Urban Mobility for Dublin in line with EC Indicators
56	New Action: East Coast trail (10.8km in DCC area)
57	New Action: Interreg, Building an Ecosystem to generate opportunities in Open Data (BE GOOD) Challenge led project to promote the safe wellbeing of the City and improvements in public transport services
58	New Action: DCC aspires to be a Future Cycling City and will collaborate with cycling cities of Amsterdam, Copenhagen and Munich to learn and share experiences in the development and promotion of cycling infrastructure. DCC will collaborate with Transport for Greater Manchester and Edinburgh in benchmarking the city's status on sustainable mobility using EC Sustainable Urban Mobility Indicators. This collaboration will leverage on European Commission Programmes. DCC will also lead local innovation and research programmes and encourage citizens and business participation in the development and deployment of sustainable transport solutions.
59	Implement a Cycle Training Programme for 6th Class students / Pedal Power Labs
60	DCC will continue to seek new and expand on existing partnerships to encourage sustainable travel and safer travel behaviours.
61	Dublin City Council will engage with local communities to develop a vision for the future of their neighbourhoods with a strong focus on local living, sustainable mobility and quality of life.
62	DCC is working in partnership with the EPA on expanding and enhancing ambient air quality monitoring in Dublin in accordance

	with the National Ambient Air Monitoring Programme
63	DCC is exploring the feasibility of carrying out an air quality status study in Dublin port

DRAFT CE REPORT

0.5.8 Action Area: Flood Resilience

Flooding is a key climate change risk facing Dublin. There were 55 submissions received in relation to Flood Resilience. These submissions led to 4 new actions and 2 amended actions.

Dealing effectively with new weather patterns (shorter, more frequent, more localised and more intensive rain storms) and sea level rise remain a primary objective of any flood resilience actions. In terms of rainfall and resultant pluvial flood risk, the need to retain surface water through green solutions will be largely within the public realm which highlights the critical nature of planning for and implementing SuDs measures.

The submissions can be broadly summarised under the following headings.

Planning

Flood Resilience Planning is referenced in actions 1, 6, 15, 16, and 18. Flood Resilience is assessed as part of all new infrastructure, existing infrastructure and all new planning permissions. GIS Risk Maps are mainly based on OPW web site www.floodinfo.ie whilst Action 15 also commits the Council to developing a GIS risk map.

A real concern expressed in many submissions was the sealing of surfaces/ the concreting of driveways. For Developments above 18m², planning permission is required for the paving and “ungreening” of gardens across the city. The City Council is seeking increased tree planting and reduced levels of concreting in all new projects and developments in the city. The draft CCAP also has an Action 38 in the Nature Based Solutions on an analysis of soil sealing.

DCC has policies in place regarding the construction of buildings beside river banks. These policies are implemented through the planning process. Sea levels have risen by over 100mm in Dublin in the last 20 years, as much as for most of the 20th century. The Strategic Flood Risk Assessment in the Dublin City Development Plan restricts development in areas at significant flood risk.

A number of submissions relate to how individual citizens could and should implement their own SuDS measures within the footprint of their homes and especially in those cases where their home is upstream of a flood zone. All new developments are being encouraged to use green infrastructure and store significant amounts of rainfall, however it is not the mandate of the CCAP to have private house owners implement SuDS at their properties.

DCC uses an integrated approach to river and storm water management across the entire catchment of river basins. Rainwater harvesting is being used in new developments to reduce potable water requirements. Leakage to waterbodies is being reduced. Dublin City Council actively promotes the use of water butts

Nature based solutions are included in Flood Alleviation Plans, including retrofitting green infrastructure (to absorb some of the rainfall locally) and improving the cycling environment. All new developments are being encouraged to use Green Infrastructure and store significant amounts of rainfall. Low carbon materials and reducing materials transportation distances are encouraged.

Chief Executives Recommendation

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

New Action 37:

Survey possibly by Drones/Satellites of paved areas in the City.

Strategic Environmental Assessment of Chief Executive's Recommendation

This action will assist in gathering baseline information relating to permeability and soil sealing. Positive interactions with SEOs including climate change, soil and geology.

Appropriate Assessment Screening of Chief Executive's Recommendation

This action will assist in gathering baseline information relating to permeability and soil sealing and will not in itself have the potential to result in likely significant effects to European Sites.

Projects

A number of submissions have been received under the broad heading of Flood Resilience Projects, which can be referenced in actions 1, 5, 6, 7, 13, 15, 16, 17, 18, 19, 20-34 and specific reference was made to a number of individual flood alleviation projects including the Clontarf flood wall; the Dodder flood alleviation project, the south Campshires, Dollymount and Sir John Rogerson's Quay projects. The submissions concern the protection of wildlife and heritage and the incorporation of cycleways and other green adaptation options.

Flood alleviation projects form the basis for adaptation to rising sea levels and to more frequent, more localised and more intensive rain storms. Climate mitigation is included in all flood defence projects, and is being prioritised for high risk areas with a number of buildings and critical infrastructures at significant risk. Flood storage is one of the options considered on each flood alleviation scheme. However, flood plains have to be very near to flood cells to have any significant effect.

DCC is committed to preserving and protecting wildlife, whilst the preservation of DCC's historic and archaeological heritage is always considered and preserved by qualified Archaeologists before, during and after flood projects. The revitalisation of the Dodder is a good example of this:

The Dodder flood alleviation scheme is referenced in action 34 and was designed with preservation of habitats in mind. Very little habitat was lost and all protected species are still there. New habitats and improved fish retention were one of the outcomes. It is still one of Dublin City's three salmonid rivers, and it is hoped to improve fish in the river with fish passes on existing weirs.

As part of the scheme DCC removed over 3,000 tonnes of contaminated material from the river estuary, where sea weed is now growing for the first time, occupied otter holts, embankments for ducks, swans and otters; a little egret appeared there for the first time, contaminated collapsing walls were removed as were very large quantities of invasive species such as Japanese Knotweed and Himalayan Balsam. Another outcome were improved salmonid and trout habitats in the lower river. The river was reinstated to 2005 levels and included new fish pools and structures. Existing

trees were maintained in many areas of the river despite massive construction problems around them.

Most of the new flood walls on the Dodder replace existing walls. Embankments were used where possible. There was no other way to protect over 1,600 buildings that were at tidal and fluvial flood risk. Very little biodiversity was lost, invasive species are being removed and new opportunities implemented.

The potential to provide improved amenities when developing flood alleviation schemes was the subject of some submissions and the approach in the Dollymount Cycleway and Flood Defence scheme is an example of good practice for this integrated approach. Aesthetics are also important and the inclusion of Wicklow granite on the South Campshires scheme is a good illustration of the need to be aware of this.

The requirements of the SEA, Habitats and Floods Directives, Eastern CFRAMS Flood Risk Management Plans, are all considered in this implementation plan

Embankments are constructed where there is space in the city, however as rivers are so constrained relative to their natural state, it may be impossible to fit in anything other than flood walls in many locations. However as stated above where possible, flood defences are designed with cycleways, subject to the constraints of timing and funding.

A number of submissions sought the construction of a Dam/Dike / Tidal generator to protect the city from future sea level raises and storm surges. This proposal is prohibitively costly (approx. €1billion) and any such proposal would need to consider the effect on Dublin Port Traffic.

Chief Executives Recommendation

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

New Action 38:

Environmental Surveys of all of City Rivers and estuaries as baseline surveys.

Strategic Environmental Assessment of Chief Executive's Recommendation

This action is positive in relation to all SEOs particularly biodiversity, water and landscape.

Appropriate Assessment Screening of Chief Executive's Recommendation

This action will not in itself result in land use effects and will not have the potential to result in likely significant effects to European Sites. The results of baseline surveys will provide important information against which future projects can be screened for impacts to rivers and estuaries, the majority are designated or are linked to designated European Sites.

Coastal Defences

Coastal Defence systems are referenced in actions 1, 4, 8, 9, 10, and 19. There is ongoing collaboration between the Flooding & Cycleway Project Divisions, in Dublin City Council around the

construction of an integrated coastal defence protected cycle lane (north-south). Construction of such projects would depend on funding streams coming on line at the same time.

Gullies

Gully cleaning is referenced in actions 2, 13, 14, 18, 19, and 37. Dublin City Council has an annual gully cleaning programme in place. Road gullies are monitored particularly in the autumn and cleaned out on a regular basis. Critical locations are cleaned out more frequently especially before predicted major rainfall events. Leaf clearance of street drains forms part of this programme and extra resources are put on this after significant rainfall.

Within the canals, the drainage network is combined (sewage and rainfall) and it is unfortunately impossible to prevent all dilute sewage discharges in heavy rain. Irish water and Dublin City Council are actively looking at ways of reducing these spills to our waterbodies.

Dublin City Council has over 50 rainfall, river level, tide monitors and mini weather stations with 1 minute records to advise on deployment of resources.

Monitoring and Maintenance of both Strategic and Sustainable Urban Drainage Systems is essential over their lifetime and replacement or upgrading of them after this will also be required to their continued functioning properly. Those in public ownership should be relative easy to monitor and maintain, however those in private ownership may ultimately require more Local Authority resources than currently to ensure proper monitoring and maintenance of them.

The supply of drinking water is the responsibility of Irish Water. Irish Water are liaising with Dublin City Council with regard to pluvial flooding in combined network areas of the City like Cabra.

Chief Executives Recommendation:

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

Action 19: Risk workshops to assess likely impacts on Council services.

New Action 39: Increase funding for Gully Cleaning in the city

Strategic Environmental Assessment of Chief Executive's Recommendation

Positive interactions in relation to awareness raising and climate change, population and human health and material assets.

Appropriate Assessment Screening of Chief Executive's Recommendation

This action will not result in land use effects and will not have the potential to result in likely significant effects to European Sites.

Strategic Environmental Assessment of Chief Executive's Recommendation

No direct landuse effects identified for this action, though increase efficiencies of gullies can reduce flood risk.

Appropriate Assessment Screening of Chief Executive's Recommendation

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

Green infrastructure

The use of green infrastructure can be referenced in actions 1, 5, 10, 11, and 12. Green areas are utilised as far as possible within the city. They may not be suitable for tidal flood zones where much of the Council's flood defences are located but are used as far as possible for fluvial flooding from smaller rivers.

Inner city development in Dublin City generally has around 10% green space. This can be significantly increased by roof gardens/green roofs. DCC encourages the use of natural flood resilience e.g. trees/shrubs/wetlands/saltmarsh/sand dunes.

Dublin City Council has many policies to try and reduce soil sealing such as Green Infrastructure, SUDS, Roof Gardens, etc. These are now being implemented in new developments around the city.

Chief Executives Recommendation:

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

Action 5: Produce a new Design Guide for SUDS and Green Infrastructure

Strategic Environmental Assessment of Chief Executive's Recommendation

Positive interaction for a number of SEOS such as water, biodiversity, landscape and climate change. Consideration should be given to the inclusion of same in the Dublin City CDP review.

Appropriate Assessment Screening of Chief Executive's Recommendation

The inclusion of this action will have the potential to result in positive implications for European Sites by improving water treatment standards during the construction and operation phase of future developments.

Water Charges

A number of submissions related to methods by which improvements could be made to water supply and water infrastructure across Dublin. Dublin City Council does not have a role in water supply. Irish Wasters' 'Water Services Strategic Plan' published in 2015 sets out the utilities' national plan for the delivery of water services to 2040.

Chief Executive's Recommendation

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

Strategic Environmental Assessment of Chief Executive's Recommendation

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

Appropriate Assessment Screening of Chief Executive's Recommendation

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

Replacement of car parking areas with permeable surfaces and planting

A submission was received that suggested replacement of car parking areas with permeable surfaces and planting. The standards and provision of car parking spaces is a function of the City Development Plan and as such is not within the remit of the Draft CCAP.

Chief Executive's Recommendation

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

Strategic Environmental Assessment of Chief Executive's Recommendation

No interaction with Strategic Environmental Objectives and no significant environmental effects are

Appropriate Assessment Screening of Chief Executive's Recommendation

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

Irish Water as a stakeholder

A submission notes that Irish Water is absent from the list of stakeholders in the plan.

Given that Irish Water are working with Dublin City Council with regards to pluvial flooding in combined network areas of the City; new text is proposed.

Chief Executive's Recommendation

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

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

Dublin City Council are working with a range of stakeholders including Irish Water in the management of pluvial flooding in combined network areas of the City.

Strategic Environmental Assessment of Chief Executive's Recommendation

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

Appropriate Assessment Screening of Chief Executive's Recommendation

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

GIS Risk Map

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

Chief Executive's Recommendation

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

Strategic Environmental Assessment of Chief Executive's Recommendation

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

Appropriate Assessment Screening of Chief Executive's Recommendation

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

Flood Resilience and Energy efficiency

A submission was received that recommended that all flood resilient measures be developed in an energy-efficient manner. Flood resilient measures are developed to maximise energy efficient in so far as possible, in line with best practice technologies. Low carbon concrete is used wherever possible in construction and local suppliers are used when available. The use of renewal wave /wind energy is investigated in each flood alleviation measure.

The Draft CCAP sets out how the council will meet the following specific climate change targets:

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

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

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

Strategic Environmental Assessment of Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Screening of Chief Executive's Recommendation

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

Table 0.5.8 Action Area: Flood Resilience - Summary of amendments to actions and new actions

Flood Resilience Action Number	Recommendation
1	No Change
2	No Change
3	No Change
4	No Change
5	No Change
6	No Change
7	No Change
8	No Change

9	No Change
10	No Change
11	No Change
12	No Change
13	No Change
14	No Change
15	No Change
16	No Change
17	Text added - Dublin City Council are working with a range of stakeholders including Irish Water in the management of pluvial flooding in combined network areas of the City.
18	No Change
19	Amended to Risk workshops to assess likely impacts on Council services.
20	No Change
21	No Change
22	No Change
23	No Change
24	No Change
25	No Change
26	No Change
27	No Change
28	No Change
29	No Change
30	No Change
31	No Change
32	No Change

33	No Change
34	No Change
35	No Change
36	No Change
37	New Action - Survey possibly by Drones/Satellites of paved areas in the City.
38	New Action - Environmental Surveys of all of City rivers and estuaries as baseline surveys.
39	New Action - Increase funding for Gully Cleaning in the city
40	New Action - The Local Authority will work with the Local Authority Waters Programme in its support of communities and stakeholders in the delivery of local water quality projects and initiatives.

0.5.9 Action Area: Nature Based Solutions

Nature based solutions are critical in climate change adaptation. There were 96 submissions received in relation to Nature Based Solutions. There were 2 new actions and amendments to 7 actions as a result of these submissions. The submissions can be broadly summarised under the following headings.

Strategic Planning

Submissions related to the Parks Strategy, the need to eliminate usage of peat, the need to increase the number of trees, allotments and community gardens and to address green space across the City.

The Dublin City Council Parks Strategy has been ongoing since 2016 and work will continue to increase the awareness of this Strategy as highlighted in some submissions. Dublin City Council Parks Strategy (2017-2022) includes for the avoidance of the use of peat in horticultural practices. This is being phased out. Since 2017, there has been a reduction of 20% in usage at St. Anne's Park nursery and the Council is working toward 50% reduction over the next 3/4 years.

The Planning Act (2010) includes for local authorities to make provision for allotments. Dublin City Council currently work with Dublin Community Growers and environmental health initiatives toward this.

In relation to the Urban Woodland Strategy (action 31), Dublin City Council is applying to central government for funding.

The Green Infrastructure Strategy is to be brought forward to 2020 to ensure it is linked to the Convention on Biological Diversity and EU Biodiversity Strategy reviews. The publication of the Sustainable Living Guide will be prioritised subject to resources being available. Suitable sites will be considered for re-development in the Green Infrastructure Strategy and the offer of community assistance is most welcome, particularly with regard to growing apples-

The OPW has published a Phoenix Park Management Plan and this is included in the Dublin City Council Development Plan as part of the City's Green Infrastructure.

Regarding the lack of green space in the Dublin Docklands area, the public realm for the area is covered within the Docklands and North Lotts SDZ plan, approved in 2014.

<http://www.dublindocklands.ie/sites/default/files/Planning/Public%20Relam/The%20Public%20Realm%20Plan%20for%20the%20SDZ%20of%20North%20Lotts%20and%20Docklands.pdf>

On the south side there is new public open space coming soon on the Sir John Rogerson Quay, south side at the new Kennedy Wilson Scheme Capital Dock scheme. There is also the proposed Benson Street public park (Chocolate Park) planned within the next two years.

Dublin City Council Parks Strategy includes actions to address the deficits in provision of green space across the City, whilst the Dublin City Council City Development Plan includes policies and objectives for trees and green space provision. National guidelines for development of apartments (2018) also give requirements for green space provision.

The Parks Division has used green roofs since 2009 and will continue to incorporate sustainable design solutions to improve climate change adaptation of buildings and their footprints. Tree protection is in accordance with national planning legislation The Dublin City Development Plan includes policies and objectives to protect existing trees as part of new developments and applies to all applications for planning consent with Dublin City e.g. Bus Connects. Any proposals must be in line with the City Development Plan which includes policies, objectives and development standards for ensuring provision of green space. However, there is currently no legal mechanism in Ireland to prevent developers from removing existing trees and vegetation prior to submission of a planning application. Under the new Environmental Impact Assessment Regulations (2018), assessment of climate change impacts is mandatory and this will include removal of existing vegetation.

Chief Executive's Recommendation

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

Action 30: Implement the North East Inner City and Liberties Greening Strategy.

Action 33: Assess feasibility of additional green space for local food production including community gardens and urban orchards.

SEA Comment

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

Appropriate Assessment Comment:

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

Spraying and Chemical Control

The Parks Division has a policy in place since 2016 to reduce usage of chemical controls, including avoidance of spraying near play areas and other sensitive zones. Glyphosate is being replaced and is used only in accordance with the approvals from central government. Dublin City Council does not allow run-off into rivers and streams. Staff are trained in careful use in accordance with the Regulations, dosage and environmental protection requirements.

Mulching and used manual methods of control have been increased and less intensive maintenance regimes are now encouraged together with increased naturalised areas to promote pollination. This requires raising public awareness and public acceptance of this form of maintenance.

Chief Executive's Recommendation:

No amendment to the Draft CCAP.

SEA Comment

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

Appropriate Assessment Comment:

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

Rivers and Streams

There are policies and actions in the current Dublin City Development Plan which provide for the continued development of linear parks along our rivers. This has been ongoing for the past 30 years, as Dublin City Council has acquired lands to develop public parks. Rehabilitation of the River Tolka included the construction of fisheries enhancement measures in cooperation with Inland Fisheries Ireland and has seen the successful return of breeding salmon and trout in previously polluted sections. Policies and actions in the River Basin District Plan are supportive of this and the achievement of good water quality status under the Water Framework Directive. Dublin Bay UNESCO Biosphere includes a marine protected zone in its zonation (www.dublinbaybiosphere.ie) and also EU-designated sites which prohibit trawling.

The River Dodder is protected with regard to: several species listed in the EU Birds and Habitats Directives; flora protected under the Flora Protection Order; the Water Framework Directive and the policies and objectives in the City Development Plan. Dublin City Council will ensure these protections are maintained.

Dublin City Council is leading a joint strategy for the Santry River with Fingal County Council. It is an action of the City Biodiversity Action Plan to facilitate an annual biodiversity workshop. The cause of Ectocarpus is not quite as clear-cut as simply water pollution. Recent research suggests that climate change is a factor in increasing the volume of algae.

Chief Executive's Recommendation

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

Action 11: Continued support of development of the Greenways concept for: Dublin Bay, Dodder, Santry, Liffey, Tolka and Camac.

SEA Comment

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

Appropriate Assessment Comment

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

Pollination

DCC was one of the first local authorities in Ireland to become a partner in the Pollinator Plan and has continued that partnership for 2019. Measures undertaken have been included in the National Biodiversity Data Centre's annual report on the Plan. Dublin City Council is monitoring bee

populations in public parks in association with third-level institutions. DCC will continue as a partner in the Pollinator Plan for the duration of the Climate Change Action Plan and monitor results over time.

Chief Executive's Recommendation

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

DCC monitors bee populations in public parks in association with third-level institutions, and DCC will continue as a partner in the Pollinator Plan for the duration of the Climate Change Action Plan and monitor results over time.

SEA Comment

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

Appropriate Assessment Comment

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

Tree Canopy Cover

Dublin City Council has had a tree planting programme in place since the 1980's and is a member of the Tree Council of Ireland, since it began in 1985 <https://treecouncil.ie/about-us>. The Dublin City Council Tree Strategy was adopted in 2017 and includes guidance for tree protection and for new planting for developments. Dublin City Council is aware of the gaps and has commissioned a study by UCD in 2016 to look at the canopy cover of the city. The City currently has 9% canopy cover and aims to increase this within the timeframe of the Tree Strategy. It is also a priority to identify which areas are in most need of increased tree canopy cover. In 2018, DCC planted over 10,000 trees city-wide. Some of these are replacement planting, due to damage and loss of trees, and trees are under severe pressures in the urban environment, including from drought. Dublin City Council is currently assessing these impacts to prevent further losses arising. The Canopy Cover study was completed as an action of the Tree Strategy and is informing this. Data is now being collected on individual trees across several districts. The Tree Strategy will guide species selection and, although it will continue to include London planes, species diversity is also important. This is a major under-taking and the appointment of a full-time Tree Officer in recent years has demonstrated the strong commitment the Council has to this issue. Planting native trees is a policy in the City Biodiversity Action Plan, including certified Irish genetic stocks. Tree planting by communities and schools is organised for National Tree Week and Tree Day and throughout the planting season. Commercial forestry schemes will not be developed due to constraints on space for tree growing already in the administrative area. However, every attempt is made to re-use timber when felling is necessary and this has resulted in providing wood for crafts and special projects such as seating in parks. Because the trees are not grown for this purpose, sometimes the wood is only suitable for mulch and this is only carried out after it has been assessed. The mulching is then used to prevent weed growth and reduce the need for chemical weed control.

Native trees are part of the City Tree Strategy but limiting to just native plants may not provide enough for biodiversity or visual interest. Many non-native plants are providing important sources of food for pollinators in the City. Small trees will be promoted in Action 16

Dublin City Council carried out an initiative for tree planting in private gardens in 2008-2009 and is currently preparing guidance on trees suitable for front gardens. This will hopefully encourage residents to take steps.

Chief Executive's Recommendation

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

Action 31: Develop urban woodland strategy as part of DCC Tree Strategy

And the following new Action is proposed to the Draft CCAP:

New Action

Analyse climate change impacts on City's trees to inform management.

SEA Comment

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

Appropriate Assessment Comment

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

Afforestation

Submissions relate to the role of afforestation in enhancing resilience to climate change. The Council recognises that increased tree planting can contribute to the development of carbon sinks in the City, which can reduce the impact of greenhouse gas emissions. Afforestation policy in Ireland, is under the jurisdiction of stakeholders including Department of Agriculture, Food and the Marine, Coillte etc. and includes initiatives such as the Afforestation Scheme. The Council will continue to implement tree planting programmes across the City in line with relevant strategies.

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment

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

Biodiversity and protected species

DCC was the first local authority to adopt a Biodiversity Action Plan and will continue to work toward protection of biodiversity in the City as we see it as an asset to provide us with ecosystem services. Protection of biodiversity, in particular those species and habitats linked to climate change impacts, are addressed in the relevant actions and in the City Biodiversity Action Plan. The integration of biodiversity across our services is covered by that Plan and Dublin City Council continues to work towards this integration. The Biosphere has produced a Conservation and Research Strategy, which involved many stakeholders and gives concrete actions for the protection of biodiversity of the Biosphere's core zone. These are currently being implemented.

Dublin City Council is currently undertaking a survey of usage of sites by Brent geese as part of the Dublin Bay UNESCO Biosphere Conservation and Research Strategy to assess the distribution and importance of grass areas for feeding for this protected species. Sustainability is promoted through Dublin Bay UNESCO Biosphere.

With regards to the collection of data, preparation and publishing a list of vulnerable habitats and species, and measures to be taken to safeguard the collection of data will take place first, and will need to be resourced and carried out over more than one year to establish changes in populations unless existing baseline data are available and useful. Measures are already undertaken for certain species but these must be evaluated in relation to their success as well as the feasibility to prevent impacts of climate change. For many migratory species in Dublin, there are numerous threats globally due to climate change that Dublin City Council cannot prevent locally or commit to 'safeguarding' them in absolute terms. The focus is to assess what actions we can take locally to try to protect these species. Following data collection, measures will be devised for implementation and then implemented, subject to resources. Their success will then be evaluated.

The 'Seeds of Change' Charter announced at the National Biodiversity Conference provides actions for National bodies to implement, and it promises to provide an increase in total biodiversity funding for local authorities from €400,000 to €800,000 over the coming years. Dublin City Council will apply for such funding and provide the 15% required matching funding from its budget. Dublin City Council currently allocates €70,000 each year in funding for biodiversity measures.

The control of invasive alien species will be pursued under the City Invasive Alien Species Action Plan. The Invasive Alien Species Action Plan includes Sea Buckthorn as a high priority species to be controlled. Dublin City Council has been working on this actively since 2011 and it is continuous, not occasional work, however the timing of works is subject to legal restrictions under EU legislation. North Bull Island Management Plan includes specific actions. Bilingual biodiversity signage is being installed currently at North Bull Island and other parks. Planting trees at North Bull Island is contrary to legal requirements under the EU Birds and Habitats Directive to maintain the designated habitats (see Management Plan and NPWS conservation plans). Dublin City Council has made considerable progress in cooperation with the golf clubs and numerous volunteers and has greatly reduced the area of protected habitats affected. Straw bales have been used for the past decade in parks. Herbs are grown in St. Anne's Park for the restaurant. Bee hives are in parks deemed suitable for such installations.

Dublin City Council has been working with Birdwatch Ireland to implement the Urban Birds Action Plan since 2012 and will continue to do so. The City Biodiversity Action Plan and the Dublin Bay UNESCO Biosphere Conservation and Research Strategy both include for measures to restore and protect habitats. This includes hedgerow surveys which are planned to be updated, and hedgerow planting (measures ongoing since 2008 under first BAP).

Chief Executive's Recommendation:

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

Action 7: Collect data to inform the preparation of a list of habitats and species in Dublin City vulnerable to climate change. Devise measures for reducing risks to these habitats and species locally and implement and evaluate their effectiveness

Action 21: Provide data to RAMSAR Committee for Ireland on wetlands in Dublin City.

New Action 39:

Engage with business community to develop sustainable business initiatives for Dublin Bay UNESCO Biosphere Business Strategy.

SEA Comment

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

Appropriate Assessment Comment

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

Table 0.5.9 Action Area: Nature Based Solutions - Summary of amendments to actions and new actions

Nature Based Solutions Action Number	Recommendation
1	No Change
2	No Change
3	No Change
4	No Change
5	No Change
6	No Change
7	Amended: Collect data to inform the preparation of a list of habitats and species in Dublin City vulnerable to climate

	change. Devise measures for reducing risks to these habitats and species locally and implement and evaluate their effectiveness
8	No Change
9	No Change
10	No Change
11	Amended: Continued support of development of the Greenways concept for: Dublin Bay, Dodder, Santry, Liffey, Tolka and Camac.
12	No Change
13	No Change
14	No Change
15	No Change
16	No Change
17	No Change
18	No Change
19	No Change
20	No Change
21	Amended: Provide data to RAMSAR Committee for Ireland on wetlands in Dublin City.
22	No Change
23	No Change
24	No Change
25	No Change
26	No Change
27	No Change
28	No Change

29	No Change
30	Amended: Implement the North East Inner City and Liberties Greening Strategy.
31	Amended: Develop urban woodland strategy as part of DCC Tree Strategy
32	
33	Amended: Assess feasibility of additional green space for local food production including community gardens and urban orchards.
34	No Change
35	No Change
36	No Change
37	No Change
38	No Change
39	Amended: Engage with business community to develop sustainable business initiatives for Dublin Bay UNESCO Biosphere Business Strategy.
40	No Change
41	No Change
42	DCC monitors bee populations in public parks in association with third-level institutions, and DCC will continue as a partner in the Pollinator Plan for the duration of the Climate Change Action Plan and monitor results over time.
43	To analyse climate change impacts on City's trees to inform management.

DRAFT CE REPORT

0.5.10 Action Area: Resource Management

35 actions are outlined under the theme of Resource Management in Dublin City Councils Climate Change Action Plan 2019-2024. There were 77 submissions received, primarily relating to waste reduction, waste recycling, waste prevention and waste reuse. There were amendments to 5 actions as a result of the submissions. These are outlined below.

Waste Reduction

A number of submissions relate to the elimination of single use plastics. Some suggestions refer to actions relevant to a deposit and return scheme. A national examination of an Irish scheme has been commissioned. Some suggestions refer to EU plastics strategy and proposed plastics directive and packaging directives. This is beyond the scope of the plan. Taxation of single use cups is a national issue and again is beyond the scope of this plan. However, Dublin City Council is undertaking its own initiatives in this area including the removal of these items from all staff canteens; the introduction of a Co-Cup Deposit and Return Scheme - a pilot project which sees Dublin City Council working with Dublin City University and Trinity College Dublin to reduce the amount of single use cups in these institutions. Dublin City Council will also work with Refill Ireland which aims to reduce our dependence on single use drinking bottles. The aim in 2019 is to work with Refill at an event in the city and to grow on this and to demonstrate there is an alternative to single use plastics in these types of events.

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

Suggestions regarding the reduction of food waste, waste segregation and the use of the appropriate food waste receptacles are referred to in Actions 6 and 8

Chief Executives Recommendation:

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

Action 8: Amend to read: Promote programmes to advise businesses on reducing waste e.g. Eco-Merit

Strategic Environmental Assessment of Chief Executive's Recommendation

Positive interactions with SEOS particularly material assets, climate change and population SEOS.

Appropriate Assessment Screening of Chief Executive's Recommendation

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

Waste Recycling

Submissions relating to the promotion of recycling are considered in Actions 1, 9, 26, and 30.

A Housing Complex recycling project is currently underway. Waste enforcement activities, waste segregation, promotion of zero waste policy (including business), and supply of public bins (including solar compacting, labelling and recycling) are considered in Actions 1, 5, 6, 7, 8, 9, 10, 14, 16, 17, and 29.

The extension of Bring Centre opening hours are considered in Actions 9, 16, and 17.

With reference to waste collection issues raised, the CCPC report recommends that existing national waste management policy as set out in “A Resource Opportunity – Waste management policy in Ireland” should be reviewed. This review will inform development of a national waste management policy, including our environmental goals, regulatory and market structures and policy instruments and tools. The DCCAE has committed to initiating the review in 2019.

The Rediscovery Centre through Ballymun Regeneration and Dublin City Council has run initiatives to encourage repair, recycling and upcycling of goods and furniture.

The promotion of a circular economy is considered in Actions 7, 9, and 14.

Chief Executive’s Recommendation:

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

Action 9: Amend to read: Promote recycling and the circular economy to householders through a range of workshops, talks and programmes.

Strategic Environmental Assessment of Chief Executive’s Recommendation

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

Appropriate Assessment Screening of Chief Executive’s Recommendation

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

Waste Prevention

Submissions in relation to litter clean ups, awards, and initiatives are considered in Actions 13 and 20.

Chief Executive’s Recommendation:

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

Action 13: Amend to read: Support and promote litter clean-up days and initiatives

Strategic Environmental Assessment of Chief Executive’s Recommendation

Actions that address illegal dumping and promote behavioural change in relation to litter generate positive effects as a reduction in illegal dumping creates long term positive effects on soil and geology, water and biodiversity, as well as Landscape and Population.

Appropriate Assessment Screening of Chief Executive's Recommendation

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

Chief Executive's Recommendation:

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

Action 20: Support and promote Tidy Towns/Green Schools/City Neighbourhoods initiatives and Local Agenda 21 Initiatives

Strategic Environmental Assessment of Chief Executive's Recommendation

Actions that address illegal dumping and promote behavioural change in relation to litter generate positive effects as a reduction in illegal dumping creates long term positive effects on soil and geology, water and biodiversity, as well as Landscape and Population.

Appropriate Assessment Screening of Chief Executive's Recommendation

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

Waste Reuse

Submission were received regarding single use items such as Election Posters, and the use of more sustainable ideas to reduce/eliminate single use items such as public drinking water fountains, water refill stations in businesses, public fridges. These suggestions may be considered under Action and 30. Initiatives relating to composting and wider availability of public gardens for vegetables are referenced through action 28

Chief Executive's Recommendation:

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

Strategic Environmental Assessment of Chief Executive's Recommendation

As with the other resource management actions, reducing waste and single use items in particular, along with the circular economy are consistent with a number of SEOs including material assets, climate change, biodiversity.

Appropriate Assessment Screening of Chief Executive's Recommendation

As with the other resource management actions, reducing waste and single use items in particular, along with the circular economy will have positive implications for the environment and will not have the potential to result in likely significant effects to European Sites.

Waste Management & Waste Collection Issues

A number of submissions suggested that the local authority should operate domestic waste services as some current operators are seen to operate in an environmentally inefficient manner. Actions and policies relating to these are set out in the 2014 document - "A Resource Opportunity - Waste Management Policy in Ireland" which is due for review in 2019. This review will inform the development of a future national waste management policy, including environmental goals,

regulatory and market structures and policy instruments and tools. This action is therefore outside the remit of the CCAP.

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

Role of LAs in Deposit and Return Scheme

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

Actions and policies relating to these are set out in the 2014 document - "A Resource Opportunity - Waste Management Policy in Ireland" which is due for review in 2019. This review will inform the development of a future national waste management policy, including environmental goals, regulatory and market structures and policy instruments and tools. This action is therefore outside the remit of the CCAP. However as noted above, Dublin City Council is undertaking its own initiatives in this area including the removal of these items from all staff canteens; the introduction of a Co-Cup Deposit and Return Scheme - a pilot project which sees Dublin City Council working with Dublin City University and Trinity College Dublin to reduce the amount of single use cups in these institutions. Dublin City Council will also work with Refill Ireland which aims to reduce our dependence on single use drinking bottles. The aim in 2019 is to work with Refill at an event in the city and to grow on this and to demonstrate there is an alternative to single use plastics in these types of events.

It should be noted also that the City Council operate several recycling centres that provide free facilities for a range of recyclable materials.

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

Banning single use plastic

A number of submissions were received recommending that the local authority ban single use plastic.

The local authority has a number of initiatives within its operational area that have led to a reduction and elimination of single use plastics. For example, the City Council have banned single use plastics in their main offices and propose to roll this out in the remaining Council buildings. Discussions are also ongoing on banning such items at Council managed or supported events.

It would be outside the remit of the local authority to implement a wider county ban on all single use plastic users. Actions and policies relating to these are set out in the 2014 document - "A Resource Opportunity - Waste Management Policy in Ireland" which is due for review in 2019. This review will take account of any EU legislation emanating from a recent vote by the European Parliament to ban a range of single use plastics.

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

Table 0.5.10 Action Area: Resource Management- Summary of amendments to actions and new actions

Resource Management Action Number	Recommendation
1	No Change
2	No Change
3	No Change
4	No Change

5	No Change
6	No Change
7	No Change
8	Amend to read: Promote programmes to advise businesses on reducing waste e.g. Eco-Merit
9	Amend to read: Promote recycling and the circular economy to householders through a range of workshops, talks and programmes
10	No Change
11	No Change
12	No Change
13	Amend to read: Support and promote litter clean-up days and initiatives
14	No Change
15	No Change
16	No Change
17	No Change
18	No Change
19	No Change
20	Support and promote Tidy Towns/Green Schools/City Neighbourhoods initiatives and Local Agenda 21 Initiatives
21	No Change
22	No Change
23	No Change
24	No Change
25	No Change
26	No Change

27	No Change
28	No Change
29	No Change
30	Amend to read: Explore collaboration with stakeholders such as Refill.ie to reduce single use items
31	No Change
32	No Change
33	No Change
34	No Change
35	No Change

0.5.11 Milestone 4 - Implementation

There were 20 submissions to this section. Submissions broadly relate to open and transparent implementation of the CCAP, assessment of climate actions, short to long term implementation of actions and the need for immediate action on climate change.

Chief Executive's Response:

Examples of submissions under this heading included targets, public awareness, hydro power, need for all council actions to be assessed for carbon and climate impact, green procurement, embodied carbon and comparison of demolition versus renovation, and full building life cycle assessment. These topics are covered in the main section headings.

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

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

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

It is the policy of Dublin City Council to re-balance movement priorities towards more sustainable modes of transportation by prioritising the development of walking and cycling facilities within a safe and traffic calmed street environment.

Dublin City Council currently adheres to national guidance on procurement as issued by the Office of Public Procurement⁸, however this guidance does not include embodied carbon as part of its assessment of infrastructural projects. There is no national guidance for Local Authorities in undertaking an embodied carbon assessment however there is a proposed new action in the Energy and Buildings Section on this issue. Construction projects in particular would also adhere to current Building Regulations which aim to ensure construction of low carbon energy efficient building.

⁸ <https://ogp.gov.ie/public-procurement-guidelines-for-goods-and-services/>

It is also noted that Transport Infrastructure Ireland (TII) has recently developed a country-specific calculation tool for assessing life cycle carbon emissions for national road and light rail infrastructure projects in Ireland. It is used for assessing “embodied” and “operational carbon” and is a requirement for the development of all future national road and light rail projects. This is based on the publicly available PAS 2080:2016⁹ Carbon Management in Infrastructure.

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

Chief Executive’s Recommendation

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

SEA Comment

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

Appropriate Assessment Comment

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

Submissions relating to implementation, efficiency and testing of the CCAP

The CCAP will be updated on an annual basis, with a review and revision every five years. At each revision, the updated CCAP will take account of demographic, technical and other changes that have occurred and any new targets that have been introduced. A separate but related reporting process including the submission of a Sustainable Energy and Climate Action Programme (SECAP) is also required as part of the Covenant of Mayors process to which DCC is a signatory.

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

Chief Executive’s Recommendation

No amendments necessary for Text or Actions.

SEA Comment

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

Appropriate Assessment Comment

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

⁹ <https://www.carbontrust.com/client-services/certification/pas-2080-2016/>

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

Regarding ongoing engagement between local authorities internal and external to the Dublin region, it is noted that the development and implementation of the CCAP, will be supported by both Codema and the Dublin Climate Action Regional Office, which involve interaction between the four Dublin local authorities. Codema will provide ongoing support to the CCAP in the areas of research, planning, technical assessment, cost benefit analysis, procurement, project management, funding applications and communications. The Dublin CARO will work with all four Dublin local authorities in implementing CCAP actions, including developing research opportunities and pilot project across the four Dublin local authorities. The CARO will also have a role in reviewing action implementation across the four Dublin local authority CCAPs. There are a number of other regional structures such as the Eastern & Midland Regional Assembly (EMRA), Eastern - Midlands Waste Regional Office and the Local Authority Waters Programme whereby ongoing engagement with other local authorities on climate change is facilitated and strengthened. In addition, the County and City Managers Association (CCMA) through its Environment sub-committee directly coordinates the national local government efforts on climate change and liaises with relevant Government Departments in this regard.

Chief Executive's Recommendation

No amendments necessary for Text or Actions.

SEA Comment

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

Appropriate Assessment Comment:

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

0.5.12 Milestone 5: Monitoring and Iteration

There were 17 submissions to this Chapter. Submissions relate to implementation timescale to 2030, the need to ensure energy target monitoring and compliance, measureable and time-bound actions, clarity regarding baselines and the need for quality data analytics.

Specific examples included the creation of an online dashboard to facilitate the public and to facilitate transparency in the review and implementation of targets, linking targets to sustainable development goals, the breaking down of the plan into four three year phases, regular updates on the plan, and consideration of biodiversity.

Chief Executive's Response:

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

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

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

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

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

Chief Executive's Recommendation:

It is recommended that the following text be added to monitoring and Iteration section of Plan.

The City Council Energy Review (mid 2019) and going forward, will include a glide path illustrating the energy efficiency and GHG emission targets for the City Council up to and including 2030. Appendix II: Total Emissions in Dublin City will also be updated every two years in accordance with EU Covenant of Mayors for Climate & Energy protocol.

SEA Comment

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

Appropriate Assessment Comment

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

DRAFT CE REPORT

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

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

	Submissions on the Environmental Report	SEA and AA Response
		<p>and set the framework for projects.</p> <p>The EU Directive on Habitats (92/43/EEC) (the Habitats Directive) as transposed into Irish law through the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I.477 of 2011) requires the assessment as to whether the implementation of a plan is likely to have significant effects on any Natura 2000 site(s).</p> <p>The CCAP was screened to determine whether it has any significant impact on any Natura 2000 site. This screening determined that stage 2 Appropriate Assessment was required.</p> <p>It should be noted that whilst the AA is a statutorily separate process to the SEA, it is, in fact, a parallel process and as such the outcomes of the AA fed into and informed the SEA process outlined above.</p> <p>The SEA and AA processes have worked together to influence of plan</p>

	Submissions on the Environmental Report	SEA and AA Response
		<p>preparation and the SEA process highlights where particular environmental sensitivities arise, and also make recommendations as to how proposed actions may be improved to increase their environmental performance.</p> <p>Proposed changes to the CCAP through the Chief Executives Report have been screened for SEA and AA to ascertain if likely significant environmental effects or significant effects on European sites would arise.</p> <p>Both processes have identified additional mitigation measures for the CCAP and the SEA has also provided for a monitoring regime, which is included within this CCAP All mitigation measures identified for the CCAP through the SEA and AA process will be adhered to and implemented over the course of the plan.</p>
	<p>Assessment of Alternatives</p> <p>We welcome that the EPA 'Developing and Assessing Alternatives in Strategic</p>	Noted.

	Submissions on the Environmental Report	SEA and AA Response
	Environmental Assessment' (2015) guidance document has been considered in preparing and assessing alternatives. We also note the alternatives considered in the SEA, and the selection of the preferred alternative	
	<p>Additional Plan Considerations</p> <p>Irish Water's Draft National Water Resources Plan should be useful to refer to, in terms of ensuring security of drinking water supply within the Plan area, is also considered. This plan includes consideration of climate change impacts. Aligning adequate and appropriate critical service infrastructure and population / economic growth of the Dublin region is essential.</p>	<p>Noted and agreed.</p> <p>Chapters 4 and 7 of the SEA ER will be expanded in the material assets section to discuss this.</p> <p>Chapter 3 will include reference to the Draft National Water Resources Plan</p>
	The link between the Plan and the sectoral adaptation plans could also be expanded on. This would clarify the alignment between the plan and other higher level sectoral plan.	<p>Noted and agreed.</p> <p>Chapter 3 of the SEA ER will expand upon this and the links to other high level sectoral plans where appropriate</p>
	Mitigation Measures	
	We acknowledge the SEA recommendations, to improve the Plan in terms of integrating wider environmental considerations into the Plan. We note the recommendation to prepare and implement a coastal zone management plan for Dublin Bay. This should be prepared in collaboration with relevant stakeholders and consider the requirements of the SEA and Habitats Directives, as appropriate.	Noted, during the preparation of such a plan, the existing mitigation measures of the Dublin City CDP will apply as listed and presented in Chapter 8 of the SEA ER.
	In relation to the application of strategic urban drainage systems as part of flood risk management actions described, these should be supported by relevant monitoring and	<p>Noted.</p> <p>The SEA recommends that interval</p>

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

	Submissions on the Environmental Report	SEA and AA Response
		annual monitoring of the CCAP, it is considered sufficient at this point to capture the transition based on annual monitoring of the action plan, supported by SEA monitoring.
	The potential for environmental impacts of 'grey' and 'green' adaptation options will differ. Where 'grey' adaptation options are chosen / proposed to be implemented, these should be adequately mitigated for, to minimise potential adverse significant environmental effects.	Noted and agreed. Mitigation Measures for 'grey' infrastructure will be highlighted in the Final SEA ER.
	Should the monitoring identify adverse impacts during the implementing the Plan, Dublin City Council should ensure that suitable and effective remedial action is taken.	Noted, this statement is included in the SEA ER.
	It is noted in Milestone 5 that the Plan will be monitored and updated on an annual basis, with a review and revision every 5 years. Any updates to the Plan, should be screened in the context of SEA and Appropriate Assessment requirements	Noted, this statement will be included in the final CCAP, see also proposed text below
	Monitoring should capture the overall achievement of the actions set out in the Plan and the contribution to the overall combined actions and targets of the four local authority plans.	Noted. It is recommended an additional text be provided to the above to highlight consistency with the requirements of the SEA Directive and reflecting the submission by the EPA, as follows:

	Submissions on the Environmental Report	SEA and AA Response
		Monitoring at local authority level is in line with current best practice such as EU Covenant of Mayor's approach. Each CCAP will be submitted to the Department of Communications, Climate Action and Environment. Under current obligations monitoring is adequately addressed in the CCAP and SEA. In addition, this may be premature in light of forthcoming Final Eastern Midland and Regional Spatial and Economic Strategy and upcoming Whole of Government Climate Action Plan.
	Future Amendments to the Plan You should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the "environmental assessment" of the Plan.	Noted, and agreed. See above text which addresses this point.
	SEA Statement – "Information on the Decision" Once the Plan is adopted, you should prepare an SEA Statement that summarises: How environmental considerations have been integrated into the Plan; How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan; The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and, The measures decided upon to monitor the significant environmental effects of implementation of the Plan.	Noted, the SEA Statement will be prepared and issued upon adoption of the CCAP.

	Submissions on the Environmental Report	SEA and AA Response
	You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.	Noted and agreed.
Dylan Potter , Geological Survey Ireland		
	<p>Geoheritage</p> <p>Information provided on Geoheritage data.</p>	
	<p>Groundwater</p> <p>With regard to Flood Risk Management, there is a need to identify areas for integrated constructed wetlands. We recommend using the GSI's National Aquifer and Recharge maps on our Map viewer to this end.</p>	<p>Noted, this will be highlighted in the SEA ER and Action 12 of the Dublin CCAP –</p> <p>Action 12 of the Dublin CCAP states: Identify areas for integrated constructed wetlands</p>
	<p>Urban Geology</p> <p>As the proposed developments take place in an urbanized environment, we suggest looking at our Urban Geology section on our website. Geological Survey Ireland produces urban geoscience data on a project basis, informing the areas of soil geochemistry and contamination, 3D modelling of ground conditions, and assessing ground motions that present a hazard to citizens in the urban environment. We also have a GeoUrban section to our Map Viewer which covers the Greater Dublin Area.</p>	<p>Noted- Soil Sealing study is included in the Dublin City CCAP (Action 38),</p>

	Submissions on the Environmental Report	SEA and AA Response
	<p>Nature based solutions should be considered even in an urban environment. For example, an analysis of soil sealing could be done to determine levels of permeability in the Greater Dublin Area. We recommend using the GSI's Quaternary subsoil map and geotechnical database for this task.</p>	
	<p>Coastal Vulnerability</p> <p>Vulnerability of the coast is intimately correlated to its characteristics and the intricate physical processes that intervene on its evolution. Strategies for coastal protection should include information from local to regional coastal vulnerability and impact assessments. Geological Survey Ireland is undertaking a new coastal vulnerability to sea-level rise mapping initiative. The maps produced in this project will aim to identify the coastal regions most likely to be affected by impacts of sea-level rise by using a coastal Vulnerability index (CVI) approach. Areas of assessment will include getting up-to-date information on current state of coastal defences, records of areas of inundation during extreme events for validating models and access to quality controlled and publically available tide gauge records for Dublin Bay.</p> <p>Management strategies for adaptation should be flexible and centred on monitoring the most vulnerable areas. Monitoring short and long-term responses in soft cliffs, such as shoreline and sediment volumetric changes is key to understand coastal behaviour and to validate forecasting models. The current ESA (European Space Agency) funded coastal erosion project (Coastal Change from Space), which GSI is a partner will</p>	<p>Noted.</p> <p>Reference to this data, modelling and the Coastal Change for Space research project will be included in the SEA ER</p>

	Submissions on the Environmental Report	SEA and AA Response
	extensively look at some of these issues over the next two years (2019-2021). This project will provide an intertidal extent model and shoreline extraction tools, will monitor sediment change in the near shore using primarily satellite derived bathymetry, and quantify backshore to foreshore sediment volumetric change over the last 20 years for targeted areas.	
Abiola Bamijoko-Okungbaye and Dr. Dimitrios Koukoularis, HappyMinds Foundation		
	<p>Climate change is currently happening, fact that we have to accept willy-nilly. A pre-planned resources can be a boon to societies and nations; however, the repercussion of not putting systems in place can be catastrophic. As we are putting plans in place, the research about the impact of climate change on our mental health and mental health-care infrastructures of our communities has been neglected. This proposal seeks to explore how we can improve the current Dublin City Council framework pertaining the mental health care of the local community in relation to climate changes.</p> <p>SEA Comment:</p> <p>The goal is to incorporate the findings of the mental health research in relation to climate change to our local Dublin action plan.</p>	The SEA ER will as part of its expanded discussion on health and climate change include the specific issue of mental health and reference this source.
Oonagh Duggan, BirdWatch Ireland		

	Submissions on the Environmental Report	SEA and AA Response
	<p>5.0 Biodiversity Adaptation to Climate Change</p> <p>Ireland's draft Biodiversity Sectoral Climate Change Adaptation Plan⁸ which is subject to public consultation until April 17 2019 states that 'Irish biodiversity is highly vulnerable to the impacts of climate change and has a low adaptive capacity compared to other vulnerable sectors. Climate change has major indirect impacts on Irish biodiversity through its interaction with other stressors, in particular habitat fragmentation and loss; overexploitation; pollution of air, water and soil; and spread of invasive species'. We would encourage that the local authority or CARO would review the final national biodiversity action plan when it is completed to ensure coherence between plans for the Greater Dublin Area with the national biodiversity adaptation plan.</p>	<p>Noted, the SEA ER Chapter Three will reference the draft Biodiversity Sectoral Climate Change Adaptation Plan along with any other required updates.</p> <p>Chapter 4 of the SEA ER will restate this finding and highlight same as a key issue and challenge.</p>
	<p>6.0 Waterbirds and Sea Level Rise</p> <p>In 2013 BirdWatch Ireland published a report on the Impacts of Sea-level Rise on the Birds and Biodiversity of Key Coastal Wetlands⁹. The report assessed the level of risk posed to each of 52 waterbird species by increasing sealevels such that those risks are:</p> <p>o high for species with wholly coastal species distributions and which rely on intertidal habitats (such as Shelduck Tadorna Knot Calidris canutus and Sanderling Calidris alba), to medium for species as above but that can feed in alternative locations, such as on grasslands (Light-bellied Brent Goose Branta bernicla hrota, Oystercatcher Haematopus ostralegus and Black-tailed Godwit Limosa limosa) and for those with</p>	<p>Noted.</p> <p>These comments will be included in the final SEA ER.</p> <p>The mitigation measure proposed in relation to retrofitting of housing and swifts is recommended for inclusion</p>

	Submissions on the Environmental Report	SEA and AA Response
	<p>predominantly coastal distributions but which are localised in Ireland (Greenland White-fronted Goose <i>Anser albifrons flavirostris</i> and Bewick's Swan <i>Cygnus columbianus bewickii</i>), and too low for other waterbirds whose distributions are not restricted to the coast (e.g. Teal <i>Anas crecca</i>, Golden Plover <i>Pluvialis apricaria</i> and Lapwing <i>Vanellus vanellus</i>) or which occur predominantly in deeper water (e.g. Red-throated Diver <i>Gavia stellata</i>, Great Crested Grebe <i>Podiceps cristatus</i>, Cormorant <i>Phalacrocorax carbo</i> and Common Scoter <i>Melanitta nigra</i>)</p> <p>In addition, the report states that 'Coastal sites are under increasing pressure from a range of anthropogenic sources such as human development, fisheries, aquaculture and human recreation. It is likely that these factors will operate cumulatively with the effects of climate change. There is an increasing need to understand the cumulative nature of pressures already operating at our coastal sites and to predict how this may be exacerbated by future sea-level rise'.</p> <p>Dublin Bay is the fourth most important site in the country for wintering waterbirds. It is critical that research is undertaken on the climate change impacts to waterbirds within Dublin City but also within the context of the Greater Dublin area where there is significant movement of species between wetlands.</p> <p>In relation to waterbirds which frequent coastal sites BirdWatch Ireland recommends</p>	<p>in the CCAP.</p>

	Submissions on the Environmental Report	SEA and AA Response
	<p>the following in the context of this Climate Action Plan:</p> <ol style="list-style-type: none"> 1. A thorough review of coastal sites that are of importance to coastal waterbirds is required, with particular emphasis on the SPA/ Natura 2000 network. The Office of Public Works is already some way towards modelling likely change and identifying vulnerable sections of coast, and such information once available is essential to this review. This review should: <ol style="list-style-type: none"> a. Set out to quantify the impact of sea-level rise on coastal birds and their habitats. b. Identify sections of the (national) coastline that are used by significant numbers of coastal waterbirds (high and medium-risk especially) and explore/promote managed realignment to minimise impacts of sea-level rise over time. 2. Coastal sites are under increasing pressure from a range of anthropogenic sources such as human development, fisheries, aquaculture and human recreation. It is likely that these factors will operate cumulatively with the effects of climate change¹⁰ to result in some sites being at greater risk or more vulnerable to biodiversity loss than others. There is therefore an increasing need to understand the cumulative nature of pressures already operating at our coastal sites and to predict how this may be exacerbated by sea-level rise in the future. 3. In addition, the greatest of efforts must be made to reduce the existing pressures and threats to waterbirds within the control of Dublin City Council including development, pollution, disturbance issues caused by dogs off leash on beaches and in the coastal environment and disturbance from people and recreational activities in sensitive locations. 	

	Submissions on the Environmental Report	SEA and AA Response
	<p>4. Internationally important migratory species such as Brent Geese can utilise the playing pitches including those of school grounds to forage when eel grass supplies have reduced at coastal sites. These areas are hugely important within a climate change adaptation scenario for Brent in the future and need to be secured.</p> <p>7.0 Breeding river birds</p> <p>Dublin's rivers and associated habitats are known to contain breeding Annex 1 Kingfisher, Dipper, Grey Wagtail, and Sand Martin. In order to protect nest sites and to provide adaptation solutions under a changing climate but also within the context of any flood mitigation measures, BirdWatch Ireland recommends that further survey work is</p> <p>undertaken to determine where these birds are breeding so as to conserve and improve breeding sites and also to prepare an evidence-based report on appropriate adaptation measures for these important species. Ensuring that river ecosystems are healthy and support fish and insect populations stocks is also critical as these are food sources</p> <p>for these bird species.</p> <p>8.0 Breeding Swifts</p> <p>Swifts breed in buildings in Dublin city and can be heard 'screaming' through several neighbourhoods of the city. Dublin City Council has already done great work to help with Swift conservation within the city. Within a climate change context, BirdWatch Ireland is concerned that with the potential for deep-retrofit, energy-saving projects that</p> <p>some Swift breeding sites may be lost due to construction work. It is really important</p>	

	Submissions on the Environmental Report	SEA and AA Response
	that Swift breeding sites are investigated in Dublin and that any works to buildings with known breeding sites include actions such as insertion of 'Swift bricks' to provide alternative nesting sites for them. All new builds or deep retrofit programmes should also include Swift bricks in those projects. BirdWatch Ireland's publication Saving Swifts is due out in 2019 and will help inform the conservation of Swifts in Ireland."	
	<p>9.1 The Natura Impact Report lists that the NIR for the East Midlands Regional Spatial and Economic Strategy (RSES) has been concluded and that there are no significant adverse impacts on the European sites in this area. However, the RSES has been re-opened for public consultation due to material developments which alter the original plan distributed for consultation. Further, these actions have been subject to Article 6.3 assessment, but the final plan has not been agreed.</p> <p>It is premature to state that as the NIR does that there are no impacts as the plan is not finalised since it is not clear if mitigation actions within the NIR will be incorporated into the final plan.</p>	<p>AA:</p> <p>The material amendments and reopening of the RSES is noted, and its status will be assessed as part of the updating to the draft CCAP, NIS and SEA ER.</p> <p>The Mitigation Actions within the NIS will be incorporated into the final plan.</p>
	9.2 There is no mention of the requirements of Article 4(4) of the Birds Directive the second sentence of which states 'Outside these protection areas, Member States shall also strive to avoid pollution or deterioration of habitats'. This is reaffirmed in Article 27 (4)(b) the European Communities Birds and Habitats Regulations (2011). In 2007 the European Court of Justice ruled against Ireland in C-418/0411 'The Birds Case' for various breaches of the Birds and Habitats Directives including on Article 4 (4) which are still being addressed by the State(see Programme of Measures to comply with the ECJ Ruling)12.	Noted, this will be included in the SEA ER and the NIS.

	Submissions on the Environmental Report	SEA and AA Response
	<p>There is no reference to the requirement that local authorities must strive to avoid the deterioration of the habitats of Annex 1 bird species found outside of European sites. In addition, it is important to recall that the Birds Directive also calls for protection of birds in the wider countryside (outside of SPAs) and this is detailed further in the NPWS Programme of Measures to address compliance issues in C-418/04.</p> <p>All efforts must be made to enforce the regulations to support birds in the wider countryside.</p>	
	<p>9.3 BirdWatch Ireland would like clarification on the statement in the NIR that there will be no significant adverse effects on the European sites when it is unclear whether the suggestions in Table 7.2 will be incorporated into the final plan. This element of doubt means that NIS is open to challenge. The suggested text is NOT in the draft climate action plan submitted for consultation. We would appreciate clarification of this.</p>	<p>Noted, for clarification the mitigation measures in Table 7.2 will be included in the final plan.</p>
Laura Howard	<p>I note the duplication of listed actions in the SEA and the Draft plan, with two anomalies., 169 actions in the latter, and 167 in the former.</p>	<p>Noted, this will be clarified prior to final plan and SEA.</p>
Thomas Cummins	<p>Dublin's rivers retain industrial water-power infrastructure in the form of weirs, mill-races, and supports for sluice gates. There is potential for small-scale electricity generation making use of the fall of water, retrofitted into this heritage infrastructure. This proposal is for developing an engineering appraisal approach for river stretches, to assess the potential for fitting turbine resources, making use of and modifying water-management structures, designing for multiple values especially fish movement,</p>	<p>Noted.</p>

	Submissions on the Environmental Report	SEA and AA Response
	<p>providing design packages, providing for electricity transmission and connectivity, and facilitating the investment sources to implement the designs.</p> <p>As a plan, in the sense of the SEA Directive, strategic environmental assessment is required for this approach. Installations for hydroelectric energy production require environmental impact assessment. Consideration would be given to the scale and potential impact of the project, as well as the aggregate effect of multiple installations, and especially so if combined with restructuring of fish habitats, indicating a need for appropriate assessment under the Habitats Directive in most cases. Scoping would be necessary in each case.</p>	
Alice Bentley	Important in urban and suburban areas as well as the wilder places these are often conducted in. Soil health!	Role and function of soil is included in Chapter 4 of the SEA ER as well as a map showing carbon sequestration functions of soil at Regional level.
John Derwin	Most climate change initiatives either involve engineering or nature based solutions. Enhancing natural coastal habitats, floodplains and uplands are all positive environmental impacts which would improve the natural environment and so pass SEA and AA requirements. Engineering solution should only be utilised where a damaging activity needs to be removed..	Noted.
Mary Mulvaney	I haven't seen anything on Air Quality and Water Quality monitoring? They are crucial measures of the health of our environment.	Please see Chapter 4 of the SEA ER. Impacts for these parameters are also

	Submissions on the Environmental Report	SEA and AA Response
		included in Chapter 7 of the SEA ER.
Seaneen Sullivan	Most climate change initiatives either involve engineering or nature based solutions. Enhancing natural coastal habitats, floodplains and uplands are all positive	Noted.
Victor Coe, Dublin City Council	<ul style="list-style-type: none"> • Scanning through the SEA and the NIS, there are few very minor edits <ul style="list-style-type: none"> o the DDHS is noted as Action 27 in both the SEA and NIS, but in the Plan the project is Action 9, o the 'Department Responsible' for ensuring developments include DH is 'Energy Division' on page 22 of the SEA, I am assuming that should be the 'Planning and Property Development, as per the Plan. o Also the 'Department Responsible' for DDHS is 'Energy Division' on page 116 of the SEA, I am assuming that should be the 'Environment and Transportation' Department, as per the Plan. o On page 130 of Minogues report in the SEA, it mentions an action 2 'District Heating enabled in Strategic Development Zones', as you know DCC has many SDZ's, so this should be specific to the Docklands and Poolbeg SDZ's. If we wish to follow this wording of the City Development Plan, we could state District Heating is encouraged in large developments. (although DH can work in any size of development) o On page 40 of Pat Doherty's report in the NIS, the SPA's and the SAC's in action 2, should be the same as those in Action 27. 	<p>Noted,</p> <p>These edits will be addressed in the final SEA ER and NIS.</p>

RECOMMENDED MITIGATION MEASURES FOR THE DUBLIN CITY CCAP – REVISED

These revised Mitigation Measures will also be included in the final SEA Environmental Report and AA Natura Impact Statement.

Overarching measure	An integrated approach to decision making in relation to these climate change actions is recommended.
Flood Resilience	Recommended text in green
	Develop and implement Coastal Zone Management plan for Dublin Bay, aligned with County Climate Change Action Plans for Dublin and other local authority plans and strategies.
	Develop template to capture impacts, response and costs (including consideration of ecosystem services/natural capital costs) for all major climate events.
	Update DLA urban drainage and flooding policies for current knowledge of flood risk and the latest best practice in drainage design promoting natural flood measures as a priority .
New text before Actions 11- 18 in Flood Resilience Section	The following flood storage actions will incorporate nature based solutions and biodiversity enhancement measures where possible. (Refers to Actions 11 to 18).
New measures to be consistent with neighbouring Local Authorities	Communication and awareness campaigns on flood risk management and natural flood management measures.

0.5.14 General Comments

Citizen and Community Engagement

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

Chief Executive's Response:

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

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

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

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

It is considered that by implementing and updating the CCAP into the future, strengthening existing networks and creating new climate change links, this will progressively inform and encourage all

citizens, communities and other stakeholders to have increased access to information and advice. Interest areas could include identification and implementation of relevant energy efficiency measures, renewable energy actions, climate adaptation and resilience measures, access to funding sources such as SEAI grant schemes, the Climate Action Fund etc.

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

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

Chief Executive's Recommendation

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

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

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

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

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

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

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

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

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

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

SEA Comment

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

Appropriate Assessment Comment

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

CCAP development and CCAP Targets

Submissions relate to the methodology for the CCAP development and how the targets were established. The National Adaptation Framework (NAF) was published in January 2018. This sets out the national strategy to reduce the vulnerability of the country to the negative effects of climate change and to avail of positive impacts. The NAF was developed under the Climate Action and Low Carbon Development Act 2015. The NAF outlines a whole of government and society approach to climate adaptation in Ireland. Under the NAF a number of Government Departments are required to prepare sectoral adaptation plans in relation to a priority area for which they are responsible. Under

the NAF, each Local Authority is also required to make a local adaptation strategy by 30th September 2019. Accordingly, each of the four Dublin local authority has prepared a Draft Climate Change Action Plan, which will be approved by the Council, and submitted to the Department of Communications, Climate Action and Environment.

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

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

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

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

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

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

Climate Change Science behind CCAP

A number of submissions relate to the science and evidence base behind climate change and the Draft CCAP. The Draft CCAP Introduction outlines the policy and legislative context under which the Plan has been prepared. At an international level, the Plan has been prepared in line with the Conference of the Parties (COP21) Paris Agreement. This legally binding, global agreement sets out a

long-term goal to put the world on track to limit global warming to well below 2 degrees centigrade above pre-industrial levels, and to pursue efforts to limit the temperature increase to 1.5 degrees. The Draft CCAP has also been prepared to respond to the findings of the Intergovernmental Panel on Climate Change (IPCC) Report on Global Warming of 1.5 °C, published in October 2018. At a national level the Draft CCAP has been prepared in accordance with relevant national legislation and policy including the Climate Action and Low Carbon Development Act 2015, National Mitigation Plan and National Adaptation Framework and Project Ireland 2040. The Draft Plan has also been prepared in accordance with the Local Authority Adaptation Strategy Development Guidelines, published in December 2018.

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

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

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

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

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

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

- Governance,

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

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

Chief Executive's Recommendation

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

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

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

SEA Comment

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

Appropriate Assessment Comment:

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

CCAP implementation

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

Milestone 4 of the Draft CCAP relates to Implementation.

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

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

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

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

CCAP Future Iterations

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

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

Developing best practice in climate change

Submissions relate to developing best practice in climate change. In implementing and monitoring the CCAP, the Council will adhere to current best practice guidelines in this area, namely 'The

Covenant of Mayors for Climate and Energy Reporting Guidelines'. This includes monitoring actions with regard to staff resourcing, action budget allocation, stakeholder and citizen engagement, CO₂ emissions reduction etc.

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

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment

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

Wider Climate Change Agenda and Urban Sustainability

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

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

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

enhancement of a cross- sectoral approach to building the sustainability of the city for future generations.

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

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

Partnership and Collaboration with other Local Authorities

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

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

Chief Executive's Recommendation

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

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

SEA Comment

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

Appropriate Assessment Comment:

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

Partnership and Collaboration with the Business Community

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

Chief Executive's Recommendation

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

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

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

New Action: The Economic Development and Enterprise Office will carry out further research to engage with stakeholders to promote and develop business supports to encourage reduction of emissions and other climate driven actions, and to develop targets that could be measured on progress being achieved.

SEA Comment

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

Appropriate Assessment Comment

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

Local authorities as leaders in action on Climate Change

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

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment

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

Review of Energy Targets

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

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

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

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

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

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

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

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

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

Addressing climate change in other sectors

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

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

Wider climate change reports

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

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

Health Effects of Climate Change Actions

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

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

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

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

Diet Vegetarianism/Veganism

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

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

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

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

Energy Performance of Public/Private Buildings

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

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

Interaction with Sectoral Climate Change Issues

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

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

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

Chief Executive's Recommendation

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

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

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

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

- Water Services Infrastructure - Department of Housing, Planning and Local Government
- Health - Department of Health

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

SEA Comment

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

Appropriate Assessment Comment:

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

Public Consultation Process and Duration

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

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

Carbon Tax

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

It is noted that the Oireachtas '*Climate Change: a cross-party consensus on climate action*' report states that the current carbon tax level in Ireland does not send a powerful enough signal to actors

to lower emissions throughout the economy, the Oireachtas Committee report also states that a rising price trajectory to 2030 should form a component of climate action policy moving forward.

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

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

Directly Elected Mayor

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

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

Chief Executive's Recommendation

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

SEA Comment

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

.

Appropriate Assessment Comment:

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

Climate Refugees

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

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

Friends of the Irish Environment v the Irish Government

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

Chief Executive's Recommendation

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

SEA Comment

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

Appropriate Assessment Comment:

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

Minor Text changes

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

Chief Executive's Recommendation:

It is recommended that some minor text updates be included

Flood Resilience Section

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

References Section

- **OPW's Irish Coastal Protection Strategy Study (ICPSS)**
- **OPW's website www.floodinfo.ie, which is a useful public information source for assessing current and future scenarios flood risk.**
- **OPW flood maps for both current and future climate change scenarios.**

Flood Resilience Section

Second paragraph under FUTURE RISKS, suggest amending text as shown below:

"Figure 14 on the opposite page depicts ... and the Annual **Event Exceedance Probability** (AEP) is used. **This is the chance of an event occurring in a year, i.e. there is a 1 in 100 chance that a flood will occur The image refers to flood event probabilities in terms of percentage Annual Exceedance Probability, or 'AEP'.** This represents the probability of an event of this, or greater, severity occurring in any given year. The 1% AEP can be expressed as odds (e.g. 100 to 1) of the event occurring in any given year".

Flood Resilience Table

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

0.5.15 Summary of Chief Executive's Proposed Amendments

Dublin City Council undertook a public consultation on the Draft Climate Change Action Plan 2019-2024 (CCAP) during the period Monday 11th February to Monday 25th March 2019 inclusive. A total of 234 valid submissions were received in response to the Consultation which translated into over 760 discrete comments on the Plan. A Chief Executive's Report has subsequently been prepared which summarises and details the outcome of this public consultation programme.

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

There were 192 actions in the Draft Climate Change Action Plan; a further 32 have been added as a result of submissions whilst another 25 have been amended. The attached table summarises the new and amended actions.

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

The Chief Executive's Report, together with the Draft CCAP, was presented to the Environment SPC on the 1st May and if approved will be included on the Agenda of the City Council meeting of the 13th May. Following that a final Climate Change Action Plan 2019-2024 will be published and submitted to the Minister for Communications, Climate Action and the Environment.

Section	Action Number	Amended Text/New Action	Text Description
Energy and Buildings	29	New	The City Council Energy Review (mid 2019) and going forward, will include a glide path illustrating the energy efficiency and GHG emission targets for the City Council up to and including 2030.
	30	New	Appendix II: Total Emissions in Dublin City of the CCAP, will also be updated every two years in accordance with EU Covenant of Mayors for Climate & Energy protocol.
	31	New	The City Architects Division of Dublin City Council is committed to participating with Irish Green Building Council and other European organisations in BUILD UPON 2. This is a project funded under the EU's H2020 programme and will run for two years from May 2019. It will work to develop long-term building renovation strategies, linked to EU and national policy, with the aim of delivering a highly efficient and decarbonised building stock by 2050.
	32	New	The City Architects Division of Dublin City Council is committed to participating with the RIAI in particular the Sustainability Task Force in seeking new and innovative approaches to Climate action in the built environment
	33	New	Identify site for trialling renewable energy projects, including solar PV and Geothermal.
	34	New	The City Council will undertake a research study to investigate the Lifecycle Assessment of Traditional and New Construction Methods for Residential Projects in Dublin with a view to formulating initial recommendations by end 2019.
	35	New	In all building projects, new build or retrofit, Swift Bricks or other nesting sites for swifts will be provided where practicable. The presence of swift breeding sites will be identified to ensure that known breeding

			sites are not lost as a result of construction work.
	36	New	Develop maintenance and condition survey programmes for Council owned historic and ancient monuments that are informed by climate change impacts.
	37	New	Conduct research and seek to develop City Council based case studies on appropriate and sensitive retro-fitting/energy upgrading of traditional buildings to inform works both to Council owned properties and to guide private owners.
	38	New	Engage with Google on their Environmental Insights programme to assess Photovoltaic potential and air quality emissions
Transport	26	Amended	Set up partnership and create a communication engagement and promotions platform
	27	Amended	Develop Cycling Action Plan: 471km identified
	29	Amended	Clontarf to City Centre Cycle (2.7km)
	30	Amended	Liffey Cycle route (6.8km)
	31	Amended	Fitzwilliam Cycle route (1km)
	33	Amended	Royal Canal Greenway (7.5km)
	34	Amended	Grand Canal Greenway (4.4km)
	35	Amended	Docklands Bridges
	38	Amended	Include target of 2000 in 2019 with a final target of 20,000 by 2030
	39	Amended	Expand by 1150 by end of 2019 and include e-bikes
	52	Amended	The Council will undertake an assessment of the number of existing and potential future Electric Vehicle Charge points in its jurisdiction and expand the availability.
	55	New	Create a baseline of Sustainable Urban Mobility for Dublin in line with EC Indicators

	56	New	East Coast trail (10.8km in DCC area)
	57	New	Interreg, Building an Ecosystem to generate opportunities in Open Data (BE GOOD) Challenge led project to promote the safe wellbeing of the City and improvements in public transport services
	58	New	<i>Participation in European Commission Research Programmes</i> DCC aspires to be a Future Cycling City and will collaborate with cycling cities of Amsterdam, Copenhagen and Munich to learn and share experiences in the development and promotion of cycling infrastructure. DCC will collaborate with Transport for Greater Manchester and Edinburgh in benchmarking the city's status on sustainable mobility using EC Sustainable Urban Mobility Indicators. This collaboration will leverage on European Commission Programmes. DCC will also lead local innovation and research programmes and encourage citizens and business participation in the development and deployment of sustainable transport solutions.
	59	New	Implement a Cycle Training Programme for 6th Class students / Pedal Power Labs
	60	New	DCC will continue to seek new and expand on existing partnerships to encourage sustainable travel and safer travel behaviours.
	61	New	Dublin City Council will engage with local communities to develop a vision for the future of their neighbourhoods with a strong focus on local living, sustainable mobility and quality of life.
	62	New	DCC is working in partnership with the EPA on expanding and enhancing ambient air quality monitoring in Dublin in accordance with the National Ambient Air Monitoring Programme
	63	New	DCC is exploring the feasibility of carrying out an air quality status study in Dublin port
Flood Resilience	17	Amended	Dublin City Council are working with a range of stakeholders including Irish Water in the management of pluvial flooding in combined network areas of the

			City.
	19	Amended	Risk workshops to assess likely impacts on Council services.
	37	New	Survey possibly by Drones/Satellites of paved areas in the City.
	38	New	Environmental Surveys of all of City rivers and estuaries as baseline surveys.
	39	New	Increase funding for Gully Cleaning in the city
	40	New	The Local Authority will work with the Local Authority Waters Programme in its support of communities and stakeholders in the delivery of local water quality projects and initiatives.
Nature Based Solutions	7	Amended	Collect data to inform the preparation of a list of habitats and species in Dublin City vulnerable to climate change. Devise measures for reducing risks to these habitats and species locally and implement and evaluate their effectiveness
	11	Amended	Continued support of development of the Greenways concept for: Dublin Bay, Dodder, Santry, Liffey, Tolka and Camac.
	21	Amended	Provide data to RAMSAR Committee for Ireland on wetlands in Dublin City.
	30	Amended	Implement the North East Inner City and Liberties Greening Strategy.
	31	Amended	Develop urban woodland strategy as part of DCC Tree Strategy.
	33	Amended	Assess feasibility of additional green space for local food production including community gardens and urban orchards.
	39	New	Engage with business community to develop sustainable business initiatives for Dublin Bay UNESCO Biosphere Business Strategy
	42	New	DCC monitors bee populations in public parks in association with third-level institutions, and DCC will continue as a partner in the Pollinator Plan for the duration of the Climate Change Action Plan and

			monitor results over time.
	43	New	To analyse climate change impacts on City's trees to inform management.
Resource Management	8	Amended	Promote programmes to advise businesses on reducing waste e.g. Eco-Merit
	9	Amended	Promote recycling and the circular economy to householders through a range of workshops, talks and programmes
	13	Amended	Support and promote litter clean-up days and initiatives
	20	Amended	Support and promote Tidy Towns/Green Schools/City Neighbourhoods initiatives and Local Agenda 21 Initiatives.
	30	Amended	Explore collaboration with stakeholders such as Refill.ie to reduce single use items.

Citizen and Community Engagement (Public Awareness)	General Comment	New	<p>The Council recognises the importance of public and stakeholder engagement in addressing climate change. In recent months, there has been a range of citizen and community engagement initiatives carried out from national to local level. The Department of Communications, Climate Action and Environment has established the National Dialogue on Climate Action, to drive citizen engagement in climate action across Ireland. Co-ordinated by the EPA, the objectives of the National Dialogue on Climate Action are to:</p> <ul style="list-style-type: none"> • Create awareness, engagement and motivation to act (locally, regionally and nationally) in relation to the challenges presented by climate change; • Create structures and information flows to facilitate people gathering to discuss, deliberate and maximise consensus on appropriate responses to these challenges, and to enable and empower appropriate action; • Establish, on a long term basis, appropriate networks for people to meet periodically to consider evidence-based inputs on the economic, social, behavioural, environmental and public aspects of climate and energy policy; and • Provide regular input, through the NDCA, into the prioritisation and implementation of climate and energy policy which can be reported and monitored at local/regional/national levels. <p>To date two regional NDCA workshops have been carried out, in Athlone (June 2018) and Tralee (November (2018). Separate to the NDCA, a range of local and community initiatives have also been undertaken across the country, including Climate ambassadors, Green Schools, Eco Merit, ECO-UNESCO etc.</p> <p>It is recognised that there is a need to foster and build momentum on wider citizen engagement in climate change, across all age groups. Local authorities have significant experience in engaging citizens through their existing functions, including land-use planning, housing, employment, transport and environmental efficiency and awareness. Local authorities are also engaged in</p>
--	------------------------	-----	--

			<p>existing public participation structures and approaches that are bottom-up, local community centred and are outcome focused. These include the Public Participation Networks, Local Community Development Committees (LCDP), Tidy Towns, Sustainable Energy Communities etc.</p> <p>Younger citizens have also engaged with the climate change agenda by participating in the #FridaysForFuture campaign, including rallies outside Government buildings. The Council aims to develop further links with younger citizens in enhancing climate change awareness and developing educational initiatives in partnership with schools, and youth organisations such as Comhairle na nÓg and Foróige.</p> <p>It is considered that by implementing and updating the CCAP into the future, strengthening existing networks and creating new climate change links, this will progressively inform and encourage all citizens, communities and other stakeholders to have increased access to information and advice. Interest areas could include identification and implementation of relevant energy efficiency measures, renewable energy actions, climate adaptation and resilience measures, access to funding sources such as SEAI grant schemes, the Climate Action Fund etc.</p> <p>Local authority efforts in citizen and community engagement should be supported by the Climate Action Regional Office, the Environmental Protection Agency and other relevant stakeholders. It is part of the CARO remit to engage and support the National Dialogue on Climate Action on a local and regional basis, and also to develop education and awareness initiatives for the public, professionals, schools, NGOs and other agencies engaged in driving the climate change agenda.</p>
--	--	--	--

Citizen and Community Engagement	General Comment	New	Pilot Climate Action Workshops with Tidy Town groups
Climate Change Science behind CCAP (The National Context – Ireland)	General Comment	New	The implementation, monitoring and future updates of the Climate Change Action Plan will be consistent with, and have regard to the Oireachtas 'Climate Change: a cross-party consensus on climate action' report (March 2019) and the Whole of Government Climate Action Plan.
Partnership and Collaboration with the Business Community	General Comment	New	The Council recognises the role of the business community in addressing climate change. In implementing and updating the CCAP into the future, the Council will engage with the business community and relevant bodies such as the Chamber of Commerce, Local Enterprise Office etc. This can include strengthening existing networks and creating new climate change links, to encourage all business community stakeholders to engage with climate change action and enhance existing projects and initiatives. Interest areas could include energy efficiency measures, renewable energy opportunities, climate adaptation and resilience measures, access to funding sources etc. There is also scope to further explore partnerships across sectors to facilitate climate action project delivery.
	Action	New	The Economic Development and Enterprise Office will carry out further research to engage with stakeholders to promote and develop business supports to encourage reduction of emissions and other climate driven actions, and to develop targets that could be measured on progress being achieved.
	General Comment		Under the National Adaptation Framework, sectoral adaptation plans are required to be prepared and submitted to the Government for approval, by 30 th September 2019. Adaptation plans will be prepared for the following sectors:

			<ul style="list-style-type: none"> • Seafood - Department of Agriculture, Food and the Marine • Agriculture - Department of Agriculture, Food and the Marine • Forestry - Department of Agriculture, Food and the Marine • Biodiversity - Department of Culture, Heritage and the Gaeltacht • Built and Archaeological Heritage - Department of Culture, Heritage and the Gaeltacht • Transport infrastructure - Department of Transport, Tourism and Sport • Electricity and Gas Networks - Department of Communications, Climate Action and Environment • Communications networks - Department of Communications, Climate Action and Environment • Flood Risk Management - Office of Public Works • Water Quality - Department of Housing, Planning and Local Government • Water Services Infrastructure - Department of Housing, Planning and Local Government • Health - Department of Health <p>The implementation and future iterations of the Climate Change Action Plan will be consistent with approved sectoral adaptation plans and the Council will work in partnership with sectors to achieve and deliver the sectoral plans.</p>
--	--	--	---

Flood Resilience	Minor Text Changes	Amended	<p>Flooding is a key climate change risk facing the Dublin Region. Climate change is expected to increase the frequency and/or intensity of heavy rainfall events and storm surges, which would increase the risk of pluvial, fluvial and coastal flooding in vulnerable areas of the City. Extreme rainfall and weather events can also place additional pressure on the urban drainage network and water supply, which can result in network flooding and water shortages. Together with the Office of Public Works (OPW) and neighbouring local authorities, DCC is actively working to implement projects and programmes that align with the EU Floods Directive and Water Framework Directive. The Floods Directive calls for member states to undertake strategic flood risk assessments and to identify flood risk management measures. Flood maps have been prepared for future climate scenarios, and the proposed community-scale measures are set out in the Flood Risk Management Plans (www.floodinfo.ie). Additional local measures can include nature-based solutions such as integrated wetlands, green infrastructure, and Sustainable urban Drainage Systems (SuDS,) to be used for adaptation and mitigation responses to achieve flood resilience.</p> <p><u>References Section</u></p> <ul style="list-style-type: none"> • OPW’s Irish Coastal Protection Strategy Study (ICPSS) • OPW’s website www.floodinfo.ie, which is a useful public information source for assessing current and future scenarios flood risk. • OPW flood maps for both current and future climate change scenarios. <p><u>Flood Resilience Section</u></p> <p>Second paragraph under FUTURE RISKS, suggest amending text as shown below:</p> <p>“Figure 14 on the opposite page depicts ... and the Annual Event Exceedance Probability (AEP) is used. This is the chance of an event occurring in a year, i.e.</p>
------------------	--------------------	---------	--

			<p>there is a 1 in 100 chance that a flood will occur The image refers to flood event probabilities in terms of percentage Annual Exceedance Probability, or 'AEP'. This represents the probability of an event of this, or greater, severity occurring in any given year. The 1% AEP can be expressed as odds (e.g. 100 to 1) of the event occurring in any given year".</p> <p>Flood Resilience Table</p> <p>Include full title to the planning guidelines, i.e." The Planning Systems and Flood Risk Management Guidelines for Planning Authorities, November 2009" (Please note that the Guidelines were published by DECLG (now DHPLG) along with the OPW).</p>
--	--	--	--

RECOMMENDED MITIGATION MEASURES FOR THE DUBLIN CITY CCAP – REVISED

These revised Mitigation Measures will also be included in the final SEA Environmental Report and AA Natura Impact Statement.

Overarching measure	An integrated approach to decision making in relation to these climate change actions is recommended.
Flood Resilience	Recommended text in green
	Develop and implement Coastal Zone Management plan for Dublin Bay, aligned with County Climate Change Action Plans for Dublin and other local authority plans and strategies.
	Develop template to capture impacts, response and costs (including consideration of ecosystem services/natural capital costs) for all major climate events.
	Update DLA urban drainage and flooding policies for current knowledge of flood risk and the latest best practice in drainage design promoting natural flood measures as a priority .
New text before Actions 11- 18 in Flood Resilience Section	The following flood storage actions will incorporate nature based solutions and biodiversity enhancement measures where possible. (Refers to Actions 11 to 18).
New measures to be consistent with neighbouring Local Authorities	Communication and awareness campaigns on flood risk management and natural flood management measures.

Section 0.6 Conclusions

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

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

DRAFT CE REPORT

APPENDIX A

List of Persons, Organisations and Bodies who made submissions

PERSON	ORGANISATION/COMPANY/BODY REPRESENTATION (if applicable)	SUBMISSION REFERENCE
Claudia Strauss		ANON-8PYF-GSDP-N
Niall Bolger		ANON-8PYF-GSD7-V
Joe Gannon		ANON-8PYF-GSDR-Q
Sinead Vaughan		ANON-8PYF-GSD5-T
Oliver Fay		ANON-8PYF-GSD4-S
Jacqueline Kelleher	Mercer B Environmental Group	ANON-8PYF-GSDK-G
Aoife Cullen		ANON-8PYF-GSDU-T
Ciara Harnett		ANON-8PYF-GSDE-A
Rachel Rosney		ANON-8PYF-GSD8-W
Anthony Duffy		ANON-8PYF-GSDF-B
Sean Brennan	Donnybrook Tidy Towns	ANON-8PYF-GSDJ-F
Susan Stafford Langan		ANON-8PYF-GSDT-S
Marcus Stewart		ANON-8PYF-GSD9-X
Paula McGauran		ANON-8PYF-GSDQ-P
Eleanor McLoughlin		ANON-8PYF-GSDD-9
Susan Stafford-Langan		ANON-8PYF-GSDC-8
Anne Whelan		ANON-8PYF-GSDX-W
G Kennedy		ANON-8PYF-GSDV-U

Carola Blaney		ANON-8PYF-GSD1-P
Carola Blaney		ANON-8PYF-GSD3-R
Abiola Bamijoko-Okungbaye and Dr. Dimitrios Koukoularis	Happy Mind Foundation	ANON-8PYF-GSDZ-Y
Patrick Flanagan		ANON-8PYF-GSDH-D
Róisín Long		ANON-8PYF-GSDN-K
Grace Hillis		ANON-8PYF-GSDY-X
Grainne McIvor		ANON-8PYF-GSBP-K
Danielle Crowley		ANON-8PYF-GSBR-N
Susan Dawson	Phibsboro' Village Tidy Towns	ANON-8PYF-GSBA-4
Damian McCarthy		ANON-8PYF-GSBM-G
Emil Slattery		ANON-8PYF-GSBE-8
Darren Clarke		ANON-8PYF-GSB4-Q
Chloe McHugh		ANON-8PYF-GSB2-N
Laura McQuaid		ANON-8PYF-GSB8-U
Laurence McLoughlin		ANON-8PYF-GSBF-9
Arthur Sheridan	Maryfield Crescent Flood Committee	ANON-8PYF-GSBJ-D
Marion Jammet		ANON-8PYF-GSB9-V
Laura Howard		ANON-8PYF-GSBD-7
Maria Angelova		ANON-8PYF-GSBC-6
Mary Connaughton		ANON-8PYF-GSBV-S
Máire O'Kelly		ANON-8PYF-GSB1-M
Eoin McMahon		ANON-8PYF-GSB3-P
Carl Raftery	Conservation Research Officer	ANON-8PYF-GSBB-5
Tadhg Ó Cruadhlaich		ANON-8PYF-GSBZ-W

Patricia Reidy		ANON-8PYF-GSBH-B
Josephine Getz		ANON-8PYF-GSBN-H
Pauline Tighe	STTCA	ANON-8PYF-GSBY-V
John Byrne		ANON-8PYF-GSB6-S
Bernadette Lynch	Old Folks Finglas	ANON-8PYF-GS3P-4
Moira Mac Sweeney	N.W. Older Persons Council	ANON-8PYF-GS3G-U
Carl O'Bruachain		ANON-8PYF-GS37-B
Tommy Foster		ANON-8PYF-GS3R-6
Jim O'Brien	CSR Consulting	ANON-8PYF-GS3A-N
Dr. James Paul Stewart		ANON-8PYF-GS3W-B
Marc Woods		ANON-8PYF-GS3M-1
Tommy Broughan T.D.		ANON-8PYF-GS35-9
Prof. Ray Bates	MRIA	ANON-8PYF-GS3E-S
Mary McBride		ANON-8PYF-GS34-8
James Larkin		ANON-8PYF-GS32-6
Kathleen Hogan		ANON-8PYF-GS3K-Y
Claudine Gaidoni		ANON-8PYF-GS3U-9
Eamonn Tierney		ANON-8PYF-GS38-C
Sarah Plunkett		ANON-8PYF-GS3S-7
Irene Donovan		ANON-8PYF-GS3F-T
Svetlana Klimentjeva		ANON-8PYF-GS3J-X
Alice Dennison		ANON-8PYF-GS3T-8
Amy Brogan		ANON-8PYF-GS3Q-5
Cannon Aoife	Sustainable Energy Authority of Ireland	ANON-8PYF-GS39-D
Gráinne Dunne		ANON-8PYF-GS3D-R

Yvonne Murray		ANON-8PYF-GS3C-Q
David Weitbrecht & Séamus Maguire	Zerowaste	ANON-8PYF-GS3X-C
Tony Carey	Trinity College Dublin	ANON-8PYF-GS3V-A
Eoghan O'Brien		ANON-8PYF-GS31-5
Lee Dillon		ANON-8PYF-GS33-7
Gerard Duffy		ANON-8PYF-GSBQ-M
Barry Duggan		ANON-8PYF-GS3Z-E
Sam Connolly		ANON-8PYF-GS3H-V
Lyndsay Walsh		ANON-8PYF-GS3N-2
Kristina McElroy	Dublin City Transition Initiative	ANON-8PYF-GS3Y-D
Siobhán Mc Cooley & Oliver Dunne		ANON-8PYF-GS36-A
Aoife Cannon		ANON-8PYF-GSTP-5
Zara Flynn	Communicorp Media	ANON-8PYF-GSTG-V
Sean Brennan	Donnybrook TidyTowns,	ANON-8PYF-GSTR-7
Michael Barry		ANON-8PYF-GSTA-P
Mary Gallagher		ANON-8PYF-GSTW-C
Irish Green Building Council	The Irish Green Building Council (IGBC)	ANON-8PYF-GST5-A
Farannan Tannam		ANON-8PYF-GST4-9
Charlotte O'Brien		ANON-8PYF-GSTK-Z
Sean Fogarty	MRIAI	ANON-8PYF-GSTU-A
Thomas Cummins		ANON-8PYF-GSBK-E
	IEG (Inchicore Environmental Group)	ANON-8PYF-GSTF-U

Maciej Wieckowski		ANON-8PYF-GSTJ-Y
Susan Stafford-Langan		ANON-8PYF-GSTT-9
Ealga Beary		ANON-8PYF-GSTQ-6
Miriam Mooney		ANON-8PYF-GST7-C
Patricia		ANON-8PYF-GSTD-S
M O'Brien		ANON-8PYF-GST9-E
Zoe Lenzie-Smith		ANON-8PYF-GST8-D
Rosemary Putt		ANON-8PYF-GSTC-R
Bridget Kiely		ANON-8PYF-GSTX-D
Maeve Mac Namara		ANON-8PYF-GST1-6
Declan Meenagh		ANON-8PYF-GST3-8
Flora		ANON-8PYF-GSTB-Q
Alice Bentley	De Courcey Square Allotments and Residents Association	ANON-8PYF-GSTZ-F
Sinead Corcoran		ANON-8PYF-GSTH-W
Jessica Freed	.	ANON-8PYF-GSTN-3
Nigel Clarke		ANON-8PYF-GSTY-E
Lucille Redmond		ANON-8PYF-GST6-B
Donna Scanlon		ANON-8PYF-GSSP-4
Rachel Walsh		ANON-8PYF-GSSG-U
Rachel Walsh		ANON-8PYF-GSS7-B
Carol Cartón Alonso		ANON-8PYF-GSSR-6
Michael Grehan		ANON-8PYF-GSSA-N
Keith Scanlon		ANON-8PYF-GSSW-B
Ian Carty		ANON-8PYF-GSSM-1
Ciarán Holahan		ANON-8PYF-GSS5-9

Heidi Kelly-Hogan		ANON-8PYF-GSS4-8
Peter FitzGerald		ANON-8PYF-GSSE-S
Jack Barry		ANON-8PYF-GSS2-6
Karl Stanley	Dublin Bay North Soc Dems	ANON-8PYF-GSSK-Y
Anna Heussaff		ANON-8PYF-GSSU-9
Kathleen Hogan		ANON-8PYF-GSS8-C
Maurizio Sturlesi	Sharo Technologies.	ANON-8PYF-GSSS-7
Jonny Speers		ANON-8PYF-GSSF-T
Siobhan Cronin		ANON-8PYF-GSSJ-X
Ivan Budanov		ANON-8PYF-GSST-8
James Orr		ANON-8PYF-GSSQ-5
Craig Benton		ANON-8PYF-GSS9-D
Pauline	Blend Residents' Association	ANON-8PYF-GSSD-R
Tom O'Dea		ANON-8PYF-GSTS-8
		ANON-8PYF-GSSC-Q
Stephanie Dickenson		ANON-8PYF-GSSV-A
		ANON-8PYF-GSSX-C
Marie Ryan		ANON-8PYF-GSS1-5
Bonnie Dempsey	Dyehouse Films	ANON-8PYF-GSS3-7
Mike Haslam		ANON-8PYF-GSSB-P
Stephanie Dickenson	Kirwan Street & Cottages Residents Committee	ANON-8PYF-GSSZ-E
Eilish Scott	Ervia	ANON-8PYF-GSSH-V

The Royal Institute of the Architects of Ireland	RIAI	ANON-8PYF-GSSN-2
Eric Conroy	An Taisce	ANON-8PYF-GSS6-A
Margaret Mc Loughlin	Mountview Family Resource Centre	ANON-8PYF-GSSY-D
Mayank Jain		ANON-8PYF-GSYP-A
Anthony (Tony) Duffy		ANON-8PYF-GSYG-1
Colum Clissmann		ANON-8PYF-GSY7-H
Ciarán Ó Súilleabháin	Aonarach	ANON-8PYF-GSYR-C
Leah Morgan		ANON-8PYF-GSYA-U
Alexandra Madeła		ANON-8PYF-GSYW-H
Conor Magee		ANON-8PYF-GSYM-7
Aoife Gallen		ANON-8PYF-GSY5-F
Martina Mullin	Healthy Trinity initiative	ANON-8PYF-GSY4-E
Shane Roberts		ANON-8PYF-GSY2-C
Tommy Daly	Sporting Liberties & Kevin's Hurling & Camogie Club	ANON-8PYF-GSYK-5
Orla Farrell	Irish Tree Trail	ANON-8PYF-GSYU-F
Kathleen Hogan		ANON-8PYF-GSY8-J
Orla Farrell	Easy Treesie	ANON-8PYF-GSYS-D
Elaine Nevin	ECO-UNESCO	ANON-8PYF-GSYJ-4
Marguerite Arbuthnot-O'Brien	Crann - Trees for Ireland	ANON-8PYF-GSYT-E
Dylan Potter	Geological Survey Ireland	ANON-8PYF-GSYQ-B
Kintilla Heussaff		ANON-8PYF-GSY9-K
Kathleen Hogan		ANON-8PYF-GSYD-X
Kelley Bermingham	Saint Patrick's	ANON-8PYF-GSYC-W

	Cathedral - local and community engagement	
Kevin Baker		ANON-8PYF-GSYX-J
Gerald O'Halloran		ANON-8PYF-GSYV-G
Roman McGoldrick		ANON-8PYF-GSY1-B
James Morris		ANON-8PYF-GSY3-D
Conor Cahill		ANON-8PYF-GSYB-V
Brian Tiernan		ANON-8PYF-GSYZ-M
Claire Bryne		ANON-8PYF-GSYH-2
Jeanne Moore		ANON-8PYF-GSYN-8
John Derwin		ANON-8PYF-GSYY-K
Simon Mc Gough		ANON-8PYF-GSY6-G
Sinéad Cotter		ANON-8PYF-GS2P-3
Cormac Deane		ANON-8PYF-GS2G-T
Emily Archer		ANON-8PYF-GSYF-Z
Patrick Tuite		ANON-8PYF-GS27-A
Maria Mulvany		ANON-8PYF-GS2R-5
Gene Murray	Watt Less	ANON-8PYF-GS2A-M
Colm Farrell		ANON-8PYF-GS2W-A
Orla McKiernan		ANON-8PYF-GS2M-Z
Sarah Fitzpatrick		ANON-8PYF-GS25-8
Seaneen Sullivan		ANON-8PYF-GS2E-R
Jack Prenderville		ANON-8PYF-GS22-5
Patrick Davis		ANON-8PYF-GS2K-X
David Beattie		ANON-8PYF-GS2U-8
John Andrews		ANON-8PYF-GS28-B

Janet Horner		ANON-8PYF-GS2S-6
Julianna Andrews		ANON-8PYF-GS2J-W
Dermot Gillen		ANON-8PYF-GS2T-7
Simon Doyle		ANON-8PYF-GS2Q-4
Catherine O'Toole		ANON-8PYF-GS29-C
Sabrina Dekker		ANON-8PYF-GS2C-P
Connor Barry		ANON-8PYF-GS2X-B
Helena Murphy		ANON-8PYF-GS2V-9
Éadaoin Heussaff		ANON-8PYF-GS21-4
Robin Cafolla		ANON-8PYF-GS23-6
Luke Binns		ANON-8PYF-GS2B-N
Hugo Thompson		ANON-8PYF-GS2Z-D
Conall Heussaff		BHLF-8PYF-GS2H-U
James McAteer	Gavin & Doherty Geosolutions	BHLF-8PYF-GS2N-1
Jennifer Boyer		BHLF-8PYF-GS2Y-C
Dr. Diarmuid Torney		BHLF-8PYF-GS26-9
Cian O'Mahony	Environmental Protection Agency	BHLF-8PYF-GSMP-X
Sinéad Healy		BHLF-8PYF-GSMG-N
Ray Cunningham		BHLF-8PYF-GSM7-5
Donal O'Brollachain		BHLF-8PYF-GSMR-Z
Zofia Howell	KRA Visionary Project Partners	BHLF-8PYF-GSMA-F
Dr. Declan Raftery		BHLF-8PYF-GSMW-5
Claire Wheeler		BHLF-8PYF-GSMM-U
Cailin Rua		BHLF-8PYF-GSM5-3
Lauren and Jared Bradley		BHLF-8PYF-GSME-K

Nessa		BHLF-8PYF-GSM4-2
Ellen Kavanagh on behalf of PJ Rudden	RPS Consulting UK & Ireland	BHLF-8PYF-GSM2-Z
Lord Mayor Nial Ring		BHLF-8PYF-GSMK-S
Cllr Claire Byrne	Green Party	BHLF-8PYF-GSMU-3
Oonagh Duggan	BirdWatch Ireland	BHLF-8PYF-GSM8-6
Eoghan Mc Carthy		BHLF-8PYF-GSMS-1
Ian Keogh	MRICS	BHLF-8PYF-GSMF-M
Dr. John Connolly		BHLF-8PYF-GSMJ-R
Svilena Dimitrova		BHLF-8PYF-GSMT-2
Cllr Damian O Farrell and Finian McGrath TD		BHLF-8PYF-GSMQ-Y
Councillor Ciarán Cuffe	Green Party	BHLF-8PYF-GSM9-7
Jerusha McCormack		BHLF-8PYF-GSMD-J
Robert Cazaciuc		BHLF-8PYF-GSMC-H
Frances Mezzetti Duggan		BHLF-8PYF-GSMX-6
Catherine Cleary		BHLF-8PYF-GSMV-4
Philip O'Donoghue		BHLF-8PYF-GSM1-Y
Héctor Ordóñez Mantecón		BHLF-8PYF-GSM3-1
Deirdre Duffy	FG General Election candidate	BHLF-8PYF-GSMB-G
Donal Murphy		BHLF-8PYF-GSMZ-8
Councillor Patrick Costello	Green Party	BHLF-8PYF-GSMH-P
Al Stew		BHLF-8PYF-GSMN-V
Georgia Scott		BHLF-8PYF-GSMY-7
Senator Alice Mary Higgins		BHLF-8PYF-GSM6-4
Michael Walsh		BHLF-8PYF-GS1P-2
Cristina Cista		BHLF-8PYF-GS1G-S

Cian O'Rourke	WEEE Ireland	BHLF-8PYF-GS17-9
---------------	--------------	------------------

DRAFT CE REPORT

Appendix B: Newspaper Notice



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

PUBLIC
NOTICE



DUBLIN CITY COUNCIL DRAFT CLIMATE CHANGE ACTION PLAN 2019-2024

Notice is hereby given, that Dublin City Council has prepared a Draft Climate Change Action Plan 2019-2024.

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

The Dublin City Council Draft Climate Change Action Plan, the Strategic Environmental Assessment (SEA) Environmental Report and Appropriate Assessment (AA) Natura Impact Report, are available for inspection during normal office opening hours at the following locations from Monday 11th February 2019 to Monday 25th March 2019 inclusive:

- Civic Offices, Wood Quay, Dublin 8 from Monday to Friday (excluding Bank Holidays) between the hours of 9:30 am to 4:30 pm.
- All Dublin City Council Libraries, during their normal office hours.
- Area Offices during their normal office opening hours, as follows:
Central Area Office, 51-53 Lower Sean McDermott Street, Dublin 1
Cabra Area Office, 97 New Cabra Road, Dublin 7
North Central Civic Centre, Bunnally Road, Coolock, Dublin 17
Darndale Area Office, Darndale Bell Building, Darndale, Dublin 17
Ballymun Civic Centre, Main Street, Ballymun, Dublin 9
Finglas Civic Centre, Mellows Road, Finglas, Dublin 11
Ballyfermot Civic and Community Centre, Ballyfermot Road, Dublin 10
Crumlin Area Office, 13 Crumlin Village, Dublin 12

The documents may also be viewed on the Council's Public Consultation Hub <https://consultation.dublincity.ie/> and at www.dublincity.ie/climatechange.

Public Information Drop-In Day
A Public Information Drop-In Day will be held during the public consultation period on **Saturday 16th February 2019**, from 12pm to 5pm in The Round Room, at The Mansion House, Dawson Street, Dublin 2. Members of the public and interested groups are invited to attend the Public Information Drop-In Day.

Submissions

Written observations or submissions regarding the Dublin City Council Draft Climate Change Action Plan 2019-2024, Strategic Environmental Assessment (SEA) Environmental Report and Appropriate Assessment (AA) Natura Impact Report are invited from members of the public and other interested parties.

Submissions can be made as follows:

Online at <https://consultation.dublincity.ie/>

Or

By email to climateaction@dublincity.ie

Or

By post / hard copy addressed to:

Executive Manager,
Environment and Transportation Department,
Dublin City Council,
Block 2,
Floor 6,
Civic Offices,
Wood Quay,
Dublin 8.

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

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

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

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

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

PLEASE NOTE:

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

Dated: Monday 11th February, 2019

Dick Brady

Assistant Chief Executive

Environment and Transportation Department

dublincity.ie

SEA SCREENING REPORT ON CHIEF EXECUTIVE'S RECOMMENDATION S DUBLIN CITY CLIMATE CHANGE ACTION PLAN 2019- 2023

Prepared under S.I 435 of 2011.

DRAFT CE REPORT

Contents

1.1 Introduction	161
1.2 Public Consultation	161
1.3 Chief Executive's Report	162
1.4 Purpose of this SEA Screening Report	162
2 Assessment of CE Recommendations for Actions in the Dublin City CCAP	164
2.1 Introduction	164
3 Assessment of Chief Executive Recommendations relating to Actions in the Dublin City CCAP	166
3 Schedule 1 Assessment	199
3.1 Introduction	199
3.2 Strategic Environmental Assessment Determination	201

1.1 Introduction

For the first time, Dublin's four local authorities have joined together to develop Climate Change Action Plans as a collaborative response to the impact that climate change is having, and will continue to have, on the Dublin Region and its citizens. While each plan is unique to its functional area, they are unified in their approach to climate change adaptation and mitigation, and their commitment to lead by example in tackling this global issue.

These CCAPs follow on from the publication of A Strategy for Climate Change Action Plans for the Dublin Local Authorities (DLAs), which was published in January 2017. The strategy used a structured approach that focused on seven key areas (Citizen Engagement, Planning, Energy, Transport, Water, Waste, and Ecosystems & Biodiversity), and set out how the DLAs would develop the four climate change action plans. The action plans will be unique to each local authority area but synchronised in their methodology.

The actions in the CCAP are presented around a number of themes as follows:

- Energy and Buildings
- Transport
- Flood Resilience
- Nature Based Solutions
- Resource Management.

Collectively, these collectively address the four targets of this plan, which are:

- A 33% improvement in the Council's energy efficiency by 2020
- A 40% reduction in the Council's greenhouse gas emissions by 2030
- To make Dublin a climate resilient region, by reducing the impacts of future climate change - related events
- To actively engage and inform citizens on climate change.

As such, the CCAP encompasses the functional and administrative area of Dublin City.

1.2 Public Consultation

Public consultation on the Draft Climate Change Action Plan took place over a six-week period from Monday 11th February to Monday 25th March 2019, with 234 valid submissions received in total.

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

0.3 Details of the Public Consultation Process

The objectives of the Draft Climate Change Action Plan public consultation process were as follows:

- Increase awareness of the Draft Climate Change Action Plan for the general public, various stakeholders, prescribed bodies, and Council staff;
- Provide opportunities for more creative and dynamic engagement with a variety of interested parties, including younger citizens, older citizens and locally based community and resident's groups;
- Increase the number, variety and quality of submissions received, appropriate to the Draft Climate Change Action Plan;
- Encourage longer term engagement strategies beyond the Draft Climate Change Action Plan stage and scope follow up activities; and
- To align with the Council's internal and external communication objectives.

The Council has used a variety of online and supporting ‘face to face’ methods, to consult and engage with the citizens of Dublin City Council area and a range of other stakeholders and interested parties.

- A Newspaper Notice appeared in the Irish Independent on Monday 11th February 2019 and in the Dublin Gazette on Thursday 14th February 2019. A copy of the Newspaper Notice is contained in Appendix B.
- A public consultation video was prepared on behalf of the four Dublin local authorities publicising climate actions and the public consultation process. The video was embedded on the dublinclimatechange.ie website and 30-second clips were used to promote the video on social media, with over 6,600 combined views alone on the Dublin CARO and Codema twitter accounts.
- 4,000 individual users accessed www.dublinclimatechange.ie since it was launched until the public consultation period ended (11th Feb – 25th Mar 2019).
- Codema developed a generic information leaflet (2,000 copies printed) and event programmes (500 copies printed each) for the #Councils4ClimateAction events. This material helped to provide information on the Plans and to promote what was taking place at each of the events. These leaflets were widely available online to help spread the word and cut down on the need for printed copies.
- The #Councils4ClimateAction social media campaign was particularly effective throughout the public consultation process and for promoting the Councils’ events.
- Codema acted as the central liaison point between all four Councils’ Communications Teams and together a central message was formed around the plans and the ‘make a submission’ call to action.
- Press releases were issued by the four DLAs and Codema in the run up to the public consultation period opening and the public events, resulting in widespread national and local media coverage such as the Irish Times, RTE Television Six-One and Nine O’Clock News Bulletins, Virgin Media One News Bulletins, RTE Radio 1 and Newstalk 106-108fm.

A total of 234 valid submissions were received.

1.3 Chief Executive’s Report

A Chief Executive’s (CE) Report has been prepared which summarises, details the outcome of the public consultation programme on the Draft Climate Change Action Plan, and contains the following:

All submissions were read, analysed and summarised. A list of the persons, organisations and bodies that made submissions is provided in Appendix A of the CE Report. The categorisations and summary of issues raised, together with the Chief Executive’s response and recommendations is contained in Section 0.5 onwards. **NB:** The headings relating to the categorisation and summary of issues raised, together with the Chief Executive’s response and recommendations, follows that of the headings of the Draft Climate Change Action Plan document i.e. Section 0.5.1 Executive Summary, Section 0.5.2 Introduction, and so forth.

1.4 Purpose of this SEA Screening Report

The purpose of this SEA Screening report and accompanying Determination is to evaluate the requirement for SEA to be undertaken on the Recommendations by the Chief Executive. This Determination should be read in conjunction with the Chief Executive report and all other associated documents including the:

- CE report;
- SEA Environmental Report for the draft Dublin City CCAP;

- Appropriate Assessment (AA) Screening Report and Natura Impact Statement for the draft Dublin City CCAP.
- AA Screening Report for the Chief Executive's Recommendations.

In deciding whether CE recommendations are likely to have significant environmental effects, regard must be had to the criteria set out in Annex II of the SEA Directive. The approach to this screening assessment is to assess each material alteration for potential environmental effects.

As the draft CCAP was subject to full SEA and is accompanied by an Environmental Report, the assessment will be undertaken within the context of the ER and in particular against the Strategic Environmental Objectives of the SEA ER.

Section Two of this report assesses the CE recommendations for identified Actions of the CCAP against the criteria contained in Schedule 1 of the Planning and Development (Strategic Environmental Assessment) Regulations SI 435 of 2004.

DRAFT CE REPORT

2 Assessment of CE Recommendations for Actions in the Dublin City CCAP

2.1 Introduction

The section examines whether each CE recommendation relating to an action would be likely to have significant environmental effects and would thereby trigger the need for SEA on same. In undertaking this SEA Screening, the relevant criteria set out in Schedule 2a of the SEA Regulations forms the basis of this assessment.

The focus of this SEA Screening is only on the CE Actions as other changes to the CCAP arising from the consultation period relate to additional text, context, consistency with other adaptation plans and do not significantly change the nature and character of the CCAP.



This section therefore assesses each of the CE Recommendations on Actions on an individual basis and then provides for an assessment of in-combination effects.

Submissions received by statutory bodies on the SEA ER are presented in Annex 1 and will be used to update the SEA ER.

Where additional text is proposed as part of the CE recommendation it is shown in **green** font. Where text is deleted this is shown in strikethrough.

Table 1 below shows the Strategic Environmental Objectives used in the Dublin City SEA Environmental Report. These are used in Section Three Assessment of CE Recommended Actions.

TABLE 1 STRATEGIC ENVIRONMENTAL OBJECTIVES

SEA Topic	Environmental Protection Objective
Biodiversity Flora and Fauna	To protect and where appropriate enhance the diversity of habitats, species, ecosystems and geological features.
 Population and human health	To create a sustainable compact city and a high quality healthy safe environment in which to live, work and/or visit.
 Water	To protect and where necessary improve the quality and management of watercourses and groundwater, in compliance with the requirements of all water and habitat based legislation including the river Basin. Management Plan of the Eastern River

Basin District.

**Air Quality
and
Climate**

Minimise emissions of pollutants to air associated with development activities and maintain acoustic quality.



Contribute to the mitigation of/and adaptation to climate change and implement requirements of Strategic Flood Risk assessment

**Soil and
Geology**

See Landscape Objective



**Material
Assets**



To make best use of Dublin city's infrastructure and material assets and to promote the sustainable development of new infrastructure to meet the needs of the city's population.

**Cultural
Heritage**



To protect and where appropriate enhance the character, diversity and qualities of Dublin city's cultural, including architectural and archaeological, heritage.

Landscape



To protect and where appropriate enhance the character, diversity and special qualities of Dublin city's landscapes and soils.



Interrelationships

Maintain and improve the health of people, ecosystems and natural processes

Actively seek to integrate opportunities for environmental enhancement during adaptation to climate change

3 Assessment of Chief Executive Recommendations relating to Actions in the Dublin City CCAP.

This section assesses the Actions recommended in the CE report for the Dublin City CCAP. In line with the approach to the SEA the actions are assessed across the parameters listed in Section 2. The matrix and symbols used are provided below in Tables 1 and 2 respectively.

TABLE 2 MATRIX OF ASSESSMENT

No likely interaction with /insignificant impact with SEOs	0	Potential conflict with SEOs – likely to be mitigated	↕
Likely to improve status of SEOs	↑	Probable conflict with SEOs – unlikely to be mitigated	↓

TABLE 3 SYMBOLS USED IN THIS SEA














































SEA Topic									
Biodiversity Flora and Fauna	Population and human health Noise	Water Resources including flood	Soil and Geology	Material Assets	Air Quality and Climatic Factors	Cultural Heritage	Landscape	Interrelationship	
									










TABLE 4 ASSESSMENT OF CE RECOMMENDED ACTIONS










No.							 <small>Climate change</small>			
	<p>The City Council Energy Review (mid 2019) and going forward, will include a glide path illustrating the energy efficiency and GHG emission targets for the City Council up to and including 2030.</p> <p>Appendix II: Total Emissions in Dublin City of the CCAP, will also be updated every two years in accordance with EU Covenant of Mayors for Climate & Energy protocol.</p>	o	o	o	o	o	o	o	o	o

















No.										
<p>SEA Comment</p> <p>These two actions as recommend will provide information on the energy efficiency and targets through diagrams (glide path) as well as biannual updates of total emissions. These in and of themselves do not give rise to landuse effects. No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation</p>										
	<p>The City Architects Division of Dublin City Council is committed to participating with Irish Green Building Council and other European organisations in BUILD UPON 2. This is a project funded under the EU's H2020 programme and will run for two years from May 2019. It will work to develop long-term building renovation strategies, linked to EU and national policy, with the aim of delivering</p>	0	↑	0	0	↑	↑	↑	↑	↑










No.										
	<p>a highly efficient and decarbonised building stock by 2050.</p> <p>The City Architects Division of Dublin City Council is committed to participating with the RIAI in particular the Sustainability Task Force in seeking new and innovative approaches to Climate action in the built environment:</p> <p>Identify site for trialling renewable energy projects, including solar PV and Geothermal.</p>									
Strategic Environmental Assessment of Chief Executive's Recommendation										










No.										
<p>Actions relating to long term building renovation and new and innovative climate action in the built environment are consistent with a number of SEOs in particular, material assets, climate change and air quality, population and human health as well as indirect positive effects in relation to cultural heritage and landscape.</p> <p>The identification of new sites for trailing renewable energy project such as geothermal should utilise the GIS data in particular. Existing measures in the Dublin City CDP, the CCAP, SEA ER and NIS will also apply. Subject to full implementation as appropriate, no adverse environmental effects are identified.</p>										
	Develop an understanding of deep geothermal resources in Dublin through the GEO-URBAN Project', with the timeframe of 2021, and the indicators being the completion of the 'report', and the target impacted is 'Public Awareness'	O	O	O	↑	↑	↑	O	O	↑
Strategic Environmental Assessment of Chief Executive's Recommendation										
<p>This action is consistent with a number of SEOs namely Climate change and air quality as well as material assets. No adverse environmental effects are identified.</p>										
	<u>New Action:</u> The City Council will undertake a research study to investigate the	O	↑	O	↑	↑	↑	↑	↑	↑










No.										
	Lifecycle Assessment of Traditional and New Construction Methods for Residential Projects in Dublin with a view to formulating initial recommendations by end 2019.									
Positive interactions with SEOS relating to lifecycle assessment research. At this juncture no landuse effects are identified and no significant environmental effects are identified for this CE recommendation										
	Action: In all building projects, new build or retrofit, Swift Bricks or other nesting sites for swifts will be provided where practicable. The presence of swift breeding sites will be identified to ensure that known breeding sites are not lost as a result of	↑	○↑	○	○	↑	↑	↑	↑	↑










No.										
	construction work.									
On foot of a submission by Birdwatch Ireland, the SEA recommended a specific measure relating to swift boxes. Positive effects on biodiversity SEOs in particular										
	<p>The City Council will undertake a research study to investigate the Lifecycle Assessment of Traditional and New Construction Methods for Residential Projects in Dublin with a view to formulating initial recommendations by end 2019.</p> <p>Develop maintenance and condition survey programmes for Council owned historic and ancient monuments that are informed by climate change impacts.</p>	0	↑	0	↑	↑	↑	↑	↑	↑










No.										
	Conduct research and seek to develop City Council based case studies on appropriate and sensitive retrofitting/energy upgrading of traditional buildings to inform works both to Council owned properties and to guide private owners									
SEA Comment The above actions focus on cultural heritage in particular. By promoting consideration of these resources and adapting and considering climate change effects stronger protection of these resources are integrated to the Dublin City CCAP. These are identified as generating positive direct interactions with a number of SEOs including Cultural Heritage, Landscape and Climate Change as well as indirect positive effects on population and human health and material assets SEOs. No adverse environmental effects are identified for these CE recommended actions.										
	Amend Action 27: Develop Cycling Action Plan: 471 km of a possible cycle network. Cycle Network and Walking and targets DCC will accelerate the delivery of cycling and									










No.										
	walking infrastructure with continuous segregation of vehicles and high levels of perceived safety. The Greater Dublin Area Cycle Network Plan has identified 471km of a possible cycle network for Dublin City. DCC will focus on the development of the greenways, primary and secondary routes while significantly improving the walking environment and creating opportunities for sojourning along the same corridors.									
<p>SEA Comment</p> <p>This proposed amendment provides for positive interactions with a range of SEOS namely climate change, air quality, material assets, population and human health. The Greater Dublin Area Cycle Network Plan was subject to SEA and AA. Subject to the implementation of relevant measures in this plan, the Dublin City CDP, CCAP,</p>										










No.										
SEA ER and NIS no adverse environmental effects are identified.										
	Amend Action 38: Bike Parking and targets Actions: Dublin City Council has drafted a strategy for the provision of public cycle parking throughout the City. Since 2018, 2,100 cycle parking spaces have been provided at 110 locations and a further 2,000 spaces are proposed to be installed in 2019 at over 120 locations. Further installations will be made to provide over 20,000 public parking spaces by 2030.	0	↑	0	0	↑	↑	0	0	↑










No.										
	DCC will also work with relevant transport bodies and businesses to expand the availability of sheltered bicycle parking to enable people to cycle to and from key public transport nodes, and strategic destinations such as the recent installations for Drury Street bike parking facilities.									
<p>SEA Comment</p> <p>This proposed amendment provides for positive interactions with a range of SEOS namely climate change, air quality, material assets, population and human health. Subject to the implementation of relevant measures in the Dublin City CDP, CCAP, SEA ER and NIS no adverse environmental effects are identified.</p>										
	<p>Amend Action 39: Bike Sharing</p> <p>DCC has had immense success with the dublinbikes scheme and there is continuous demand to expand this</p>	O	↑	O	O	↑	↑	↑	↑	↑










No.										
	<p>programme, which will help to reduce emissions and provide more options for sustainable modes of transport. DCC will continue to monitor its performance and any expansions will take account of emerging business models for bikesharing.</p> <p>DCC has facilitated the expansion of bike share options through the creation of Bye Laws in 2017 for the operation of Stationless/Dockless bike share schemes. Current operator Bleeperbike now covers areas of the city not included in the Dublinbike Scheme making bike share an option for a wider population.</p> <p>DCC will seek an expansion of the bike sharing programme by a further</p>									










No.										
	1150 bikes by the end of 2019. This expansion will also seek to include e-bikes									
SEA Comment: This proposed amendment provides for positive interactions with a range of SEOS namely climate change, air quality, material assets, population and human health. Subject to the implementation of relevant measures in the Dublin City CDP, CCAP, SEA ER and NIS no adverse environmental effects are identified.										
	<p>New Action: Participation in European Commission Research Programmes</p> <p>DCC aspires to be a Future Cycling City and will collaborate with cycling cities of Amsterdam, Copenhagen and Munich to learn and share experiences in the development and promotion of cycling infrastructure. DCC will collaborate with Transport for Greater Manchester and Edinburgh in</p>		↑			↑	↑			










No.										
	<p>benchmarking the city's status on sustainable mobility using EC Sustainable Urban Mobility Indicators. This collaboration will leverage on European Commission Programmes. DCC will also lead local innovation and research programmes and encourage citizens and business participation in the development and deployment of sustainable transport solutions.</p>									
<p>SEA Comment: This proposed amendment provides for positive interactions with a range of SEOS through research and collaboration indirect positive interactions with climate change, air quality, material assets, population and human health. No adverse environmental effects are identified.</p>										










No.										
	New Action: Baseline Create a baseline of Sustainable Urban Mobility for Dublin in line with EC Indicators	0	0	0	0	0	0	0	0	0
SEA Comment: As with the preceding action, this action relates to research and baseline. Collation of such baseline information is essential to understanding trends with transport and mobility a critical issue. No landuse effects are identified and no adverse environmental effects are identified.										
	DCC participates in the national Cycle Right programme bringing cycle training to pupils in primary and secondary schools throughout the city area. DCC works closely with An Taisce Green Schools on the Green Travel theme and encourages increased cycling through support for cycle training, on site cycle parking and	0	↑	0	0	↑	↑	0	0	↑










No.										
	<p>improvements to the physical environment identified by pupils.</p> <p>Cycle Training Programme for 6th Class students / Pedal Power Labs</p>									
<p>SEA Comment:</p> <p>Action that promotes and encourages a modal shift is positive in relation to SEOs including population and human health , climate change and material assets.</p>										
	<p>New Partnerships:</p> <p>DCC will continue to seek new and expand on existing partnerships to encourage sustainable travel and safer travel behaviours.</p> <p>New Action:</p> <p>Community Engagement:</p>	↑	↑	↑	↑	↑	↑	↑	↑	↑










No.										
	<p>Dublin City Council will engage with local communities to develop a vision for the future of their neighbourhoods with a strong focus on local living, sustainable mobility and quality of life.</p> <p>New Action: Communications and Promotion</p> <p>DCC will establish a portal dedicated to communication and promotion of active travel within existing platforms.</p>									
<p>SEA Comment</p> <p>The above actions support engagement communication and collaboration and this is consistent with a number of SEOS including population and human health , climate change and material assets.</p>										










No.										
	DCC is working in partnership with the EPA on expanding and enhancing ambient air quality monitoring in Dublin in accordance with the National Ambient Air Monitoring Programme DCC is exploring the feasibility of carrying out an air quality status study in Dublin port	↑	↑	↑	0	↑	↑	0	0	↑
SEA Comment Actions relating to air quality monitoring are positive particularly as they can be used to provide a baseline and monitoring regime for air quality trends. This is consistent with a number of SEOS including population and human health, climate change and material assets. Indirect longer positive effect should the monitoring result in actions that improve air quality with accompanying benefits for biodiversity, human health, water and climatic factors.										










No.										
	The Council will undertake an assessment of the number of existing and potential future Electric Vehicle Charge points in its jurisdiction.									
SEA Comment: This action relates to an assessment only and no landuse effects are identified. No interaction with Strategic Environmental Objectives currently and no significant environmental effects are identified for this CE recommendation.										
	New Action: East Coast trail (10.8km in DCC area)	↕	↑	↕	↕	↑	↑	↕	↕	↑
	Action 37: Survey possibly by Drones/Satellites of paved areas in the City.	○	↑	↑	↑	○	↑	○	○	↑










No.										
Comment: This action will assist in gathering baseline information relating to permeability and soil sealing. Positive interactions with SEOs including climate change, soil and geology.										
	Action 38: Environmental Surveys of all of City rivers and estuaries as baseline surveys.	↑	↑	↑	↑	↑	↑	↑	↑	↑
SEA Comment: This action is positive in relation to all SEOs particularly biodiversity, water and landscape.										
	Action 19: Risk workshops to assess likely impacts on Council services.	0	↑	0	0	↑	↑	0	0	↑
SEA Comment: Positive interactions in relation to awareness raising and climate change, population and human health and material assets.										
	Action 39: Increase funding for Gully	0	0	0	0	0	0	0	0	0










No.										
	Cleaning in the city									
Comment: No direct landuse effects identified for this action, though increase efficiencies of gullies can reduce flood risk.										
	Action 5: Produce a new Design Guide for SUDS and Green Infrastructure	↑	↑	↑	↑	↑	↑	0	↑	↑
Comment: Positive interaction for a number of SEOS such as water, biodiversity, landscape and climate change. Consideration should be given to the inclusion of same in the Dublin City CDP review										
	Action 30: Implement the North East Inner City and Liberties Greening Strategy. Action 33: Assess feasibility of additional green space for local food production including community	↑	↑	↑	↑	↑	↑	↑	↑	↑

No.										
	gardens and urban orchards.									
SEA Comment Positive interactions in relation to population, biodiversity, soil, landscape and climate change SEOS										
	Action 11: Continued support of development of the Greenways concept for: Dublin Bay, Dodder, Santry, Liffey, Tolka and Camac.	↑↕	↑	↑	↑	↑	↑	↑	↑	↑
SEA Comment Positive interactions and subject to full implementation of measures in the CCAP, SEA ER, NIS and Dublin City CDP no adverse environmental effects are identified.										
	Action 31: Develop urban woodland strategy as part of DCC	↑	↑	↑	↑	↑	↑	↑	↑	↑

No.										
	Tree Strategy And the following new									
	Action is proposed to the Draft CCAP: Analyse climate change impacts on City's trees to inform management.	↑	↑	↑	↑	↑	↑	↑	↑	↑
SEA Comment Positive interactions with biodiversity, landscape, climate change and human health SEOs amongst others. Co benefits also relate to soil and permeability as well as ecological connectivity and enhancement.										
	Action 7: Collect data to inform the preparation of a list of habitats and species in Dublin City vulnerable to climate change.	↑	↑	↑	↑	↑	↑	↑	↑	↑

No.										
	<p>Devise measures for reducing risks to these habitats and species locally and implement and evaluate their effectiveness</p> <p>Action 21: Provide data to RAMSAR Committee for Ireland on wetlands in Dublin City.</p> <p>Action 39: Engage with business community to develop sustainable business initiatives for Dublin Bay UNESCO Biosphere Business Strategy.</p>									
Positive interactions across of a number of SEOS relating to data gathering and adaptation to climate change and biodiversity. The role of wetlands in carbon sequestration is increasingly recognised.										

No.										
	Action 8: Amend to read: Promote programmes to advise businesses on reducing waste e.g. Eco-Merit	↑	↑	↑	↑	↑	↑	↑	↑	↑
Strategic Environmental Assessment of Chief Executive's Recommendation Positive interactions with SEOS particularly material assets, climate change and population SEOS.										
	Action 9: Amend to read: Promote recycling and the circular economy to householders through a range of workshops, talks and programmes. Action 13: Amend to read: Support and promote litter clean-up	↑	↑	↑	↑	↑	↑	↑	↑	↑

No.										
	<p>days and initiatives</p> <p>Action 20: Support and promote Tidy Towns/Green Schools/City Neighbourhoods initiatives and Local Agenda 21 Initiatives</p>									
<p>Comment: Promotion of circular economy is consistent with SEOS particularly around material assets and climate change. Actions that address illegal dumping and promote behavioral change in relation to litter generate positive effects as a reduction in illegal dumping creates long term positive effects on soil and geology, water and biodiversity, as well as Landscape and Population</p>										
	<p>The Local Authority will work with the Local Authority Waters Programme in its support of communities and stakeholders in the delivery of local water quality projects and</p>	↑	↑	↑	↑	↑	↑	↑	↑	↑










No.										
	initiatives									
SEA comment: positive interactions with all SEOs										
	<i>The City Council will carry out further research to engage with stakeholders to promote and develop business supports to encourage reduction of emissions and other climate driven actions, and to develop targets that could be measured on progress being achieved</i>		↑			↑	↑			↑
This text provides greater context and support for public awareness and engagement and role of business community in addressing climate change. Positive interactions with Population and Human Health and Climate Change SEOS and no significant adverse effects are identified for this CE recommendation.										

TABLE 5 IN COMBINATION EFFECTS

Plan	Comment	Cumulative effects
Climate Change Action Plans 2019-2024 for other Dublin Local Authorities	<p>During the formulation of the CCAPs for the Dublin Region, a suite of common thematic actions have been prepared for each of the local authority areas</p> <p>The individual action plan for each Local Authority has undergone Habitats Directive Assessment and Strategic Environmental Assessment. It has been found that by implementing the mitigation policies and objectives of the relevant CDP as identified in the NIR and SEA ER, effects to the environment and European Sites are not likely to occur</p>	Adverse cumulative effects not identified
National Planning Framework	<p>The purpose of the NPF is to provide a focal point for spatial plans throughout the planning hierarchy. It will provide a framework for the new Regional Spatial and Economic Strategies (RSEs) by the three Regional Assemblies and the associated enhancement of the economic development focus of local authorities as per the Local Government Reform Act 2014. The NPF will co-ordinate the strategic planning of urban and rural areas in a regional development context to secure overall proper planning and development as well as co-ordination of the RSEs's and city/ county development plans in addition to local economic and community plans and</p>	The SEA And NIR of the NPF and Draft RSES are now available.

	local area plans and other local development.	
Regional Spatial & Economic Strategy (Draft)	<p>The RSES is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level it provides a framework for investment to better manage spatial planning and economic development throughout the Region. The Eastern and Midland Regional Assembly have proposed material amendments to the draft Regional Spatial and Economic Strategy for the period 2019-2031, as required under section 24 (8) of the Planning and Development Acts 2000-2018.</p> <p>The Environmental Report has been updated in accordance with the SEA Directive and the Planning and Development (Strategic Environmental Assessment) Regulations S.I. No. 436/2004 (as amended), accompanied by a Regional Flood Risk Appraisal Report. A Natura Impact Report (to inform the Appropriate Assessment) has also been updated in accordance with Article 6 of the Habitats Directive, the Planning and Development Act 2000-2018, and the European Communities (Birds and Natural Habitats) Regulations S.I. No. 477/2001 (as amended).</p> <p>These documents were on display until 12th April 2019 and the report on consultations and Material amendments will be considered when available.</p>	The SEA ER and NIS of the draft RSES and material amendments SEA were reviewed. At this juncture, no adverse in combination effects are identified
Water Services Strategic Plan	Ireland's first integrated national plan for the delivery of water services, the Water Services Strategic Plan (WSSP) addresses six key themes and was adopted in 2015. It was subject to full SEA and AA and concluded that	No in-combination impacts were predicted as a result of implementation of the Plans

	Overall, the assessment has identified that the implementation of the draft WSSP is likely to have positive effects on the majority of the SEOs that have been used in the assessment to help characterise the environmental effects of the WSSP and no significant negative effects were identified.	
Neighbouring County Development Plans	These plans were subject to full SEA and AA and concluded that subject to full adherence and implementation of measures likely significant effects were not identified.	No in-combination impacts were predicted as a result of implementation of the Plans
River Basin District Management Plans.	The National River Basin District Management Plan is now published (2018). The second cycle River Basin Management Plan aims to build on the progress made during the first cycle with a greater emphasis on ensuring the evidence base is available and the administration supports are fully in place to support key measures. The approach to the plan development involves characterisation of Ireland's water bodies in order to develop a tailored programme of measures to allow for the protection of good status or the restoration of good status for all water bodies. The outcomes are then monitored in order to feed into further characterisation and measures setting as the cycle moves forward. The plan was subject to SEA and Appropriate Assessment.	No in-combination impacts are predicted as a result of implementation of the Plans
CFRAMS Study	The Eastern CFRAM study has been commissioned in order to meet the requirements of the Floods Directive, as well as to deliver on core components of the 2004 National Flood Policy, in the Eastern district.	No in-combination impacts are predicted as a result of implementation of the Plans.

**Greater Dublin
Drainage**

Irish Water made a planning application for strategic infrastructure development to An Bord Pleanála for the Greater Dublin Drainage Project in June 2018. The GDD project proposes a new regional wastewater treatment facility to be located in the townland of Clonshaugh in north county Dublin, an underground orbital sewer from Blanchardstown to Clonshaugh, a new pumping station at Abbotsown, a partial diversion of the north fringe sewer, and an outfall pipeline to return the treated water to the Irish Sea. The project also includes a regional sludge treatment centre at the new GDD facility and an associated biosolids storage facility at Newtown near Kilshane Cross.

Chapter 23 of the EIAR was reviewed with a focus on the cumulative impacts,

No in-combination impacts are predicted as a result of implementation of the Project

The Greater Dublin Transport Strategy 2016-2035	<p>The Transport Strategy for the Greater Dublin Area, 2016-2035 has been prepared and published by the National Transport Authority. It sets out how transport will be developed across the region, covering Dublin, Meath, Wicklow and Kildare, over the period of the strategy and has been approved by the Minister for Transport, Tourism and Sport in accordance with the relevant legislation.</p> <p>Luas, heavy rail and orbital bus routes are of particular relevance to the elements of this Strategy and the CCAP.</p>	Positive effects in relation to the prioritisation of public transport modes above private transport.
--	---	---

It is noted that a series of sectoral adaptation plans are due to be submitted to government by end of September 2019. Reference is made to same and a commitment to consistency is provided in the CE Report National Context as follows:

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

- *Seafood - Department of Agriculture, Food and the Marine*
- *Agriculture - Department of Agriculture, Food and the Marine*
- *Forestry - Department of Agriculture, Food and the Marine*
- *Biodiversity - Department of Culture, Heritage and the Gaeltacht*
- *Built and Archaeological Heritage - Department of Culture, Heritage and the Gaeltacht*

- *Transport infrastructure - Department of Transport, Tourism and Sport*
- *Electricity and Gas Networks - Department of Communications, Climate Action and Environment*
- *Communications networks - Department of Communications, Climate Action and Environment*
- *Flood Risk Management - Office of Public Works*
- *Water Quality - Department of Housing, Planning and Local Government*
- *Water Services Infrastructure - Department of Housing, Planning and Local Government*
- *Health - Department of Health*

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

3 Schedule 1 Assessment

3.1 Introduction

This section presents a screening in line with Schedule 1 of the SEA Regulations(S.I 435 of 2004) as amended. It concludes with a SEA Screening Conclusion.

Table 6 SEA Screening against Schedule 1

Criteria for determining whether the Plan is likely to have significant effects on the environment	
1. The characteristics of the plan having regard, in particular, to:	
<i>the degree to which the Plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,</i>	
<p>The plan does establish a range of actions, some of which are more landuse based, than others. The plan will provide a framework to help achieve climate change resilience at DCC level but also as part of a wider Dublin regional co-ordinated effort.</p> <p>The CE recommended actions are in compliance with the Strategic Environmental Objectives as Section Two of this report demonstrate.</p>	
<i>the degree to which the Plan influence other plans, including those in a hierarchy,</i>	
<p>The CE recommendations as they relate to actions will be underpinned by the statutory planning framework hierarchy in particular the National Planning Framework, Eastern and Midlands Regional Economic and Spatial Strategy , Dublin City CDP.</p>	
<i>the relevance of the Plan in the integration of environmental considerations in particular with a view to promoting sustainable development,</i>	
<p>The CE recommendations as they relate to actions overall strengthen environmental protection particularly in relation to cultural heritage and circular economy.</p> <p>By inserting all SEA and AA mitigation measures identified on the draft Plan further commitments to environmental enhancement are provided.</p>	
<i>Environmental problems relevant to the Planning Scheme</i>	
<p>The assessment in Section 2. has shown that conflicts with SEOS are not identified; and where they are, existing mitigation measures included in the CCAP SEA ER, Natura Impact Statement and Dublin City CDP will provide sufficient environmental protection.</p> <p>The draft CCAP has been prepared through careful consideration of key environmental issues and the CE Recommendations as they relate to actions do not dilute or significantly affect these environmental considerations.</p>	
<i>the relevance of the Plan to the implementation of European Union legislation on the environment (e.g. plans linked to waste-management or water protection).</i>	
<p>The SEA , and other environmental assessments including Appropriate Assessment considered and integrated European Union legislation on the environment including those relating to topics such as</p>	

Waste Management and Water protection.

Given the severe challenges facing Ireland in responding to climate change, the CCAP is very relevant in setting out actions, targets and indicators that can be measured to see how at local authority level, measures are being implemented to respond to this urgent issue.

The assessment of the CE actions has not identified conflicts with such provisions and no significant effects on the environment are identified.

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

the probability, duration, frequency and reversibility of the effects,

The Proposed CE Recommendations would not be likely to result in significant environmental effects as detailed in the individual assessment of actions in Section 2 and in combination assessment in Section 2.

the cumulative nature of the effects,

The CE recommendations as they relate to actions would not be likely to result in significant environmental effects as detailed in the individual assessment of the actions in Section 2 and in combination assessment in Section 2

the transboundary nature of the effects

The CE Recommendations as they relate to actions would not be likely to result in significant environmental effects as detailed in the individual assessment of actions in Section 2 and in combination assessment in Section 2

the risks to human health or the environment (e.g. due to accidents),

The CE Recommendations would not be likely to result in significant environmental effects as detailed in the individual assessment of the actions in Section 2 and in combination assessment in Section 2.

the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).

The CE Recommendations as they relate to actions would not be likely to result in significant environmental effects as detailed in the individual assessment of material alterations in Section 2 and in combination assessment in Section 2.

the value and vulnerability of the area likely to be affected due to:

(a) special natural characteristics or cultural heritage

The sphere of influence of the CCAP includes a number of European Sites as well as numerous important cultural heritage sites and landscapes. The new actions proposed by the CE as they relate to cultural heritage are particularly significant as they relate to adapting and considering climate change on cultural heritage.

Existing measures in the CCAP, SEA ER and Natura Impact statement, subject to their full implementation are not identified as giving rise to significant effects on European Sites within the

plans' sphere of influence.
<p>(b) exceeded environmental quality standards or limit values,</p> <p>It is anticipated that environmental quality standards will not be exceeded by the CCAP actions.</p>
<p>(c) intensive land-use,</p> <p>No significant environmental effects are identified for the CE recommendations as they relate to actions.</p>
<p>(d) the effects on areas or landscapes which have a recognised national, European Union or international protection status.</p> <p>A Habitats Directive Screening Statement has been prepared in tandem with this SEA Screening to assess if likely significant effects arise in relation to conservation management objectives of European Sites and the CE Recommendations as they relate to actions. This has found that no such effects are identified. .</p>

3.2 Strategic Environmental Assessment Determination

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

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

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

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

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

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

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

DRAFT CE REPORT



Dublin City Council

Climate Change Action Plan 2019 - 2024

Screening for Appropriate Assessment
on the Chief Executive's
Recommendations

25th April 2019

Dublin City Council

Climate Change Action Plan 2019 - 2024

Screening for Appropriate Assessment on the Chief Executive Recommendations

Document Stage	Document Version	Prepared by
----------------	------------------	-------------

Final	1	Pat Doherty MSc, MCIEEM
-------	---	-------------------------

This report has been prepared by DEC Ltd with all reasonable skill, care and diligence.

Information report herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is prepared for Dublin City Council and we accept no responsibility to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at their own risk.

DRAFT CEREPOR

Table of Contents

1.1	Introduction	
1		
1.2	Details of the Public Consultation Process	
2		
1.3	Chief executives report	
3		
1.4	purpose of this Appropriate Assessment screening report	
3		
2.0	Screening Conclusion & determination	15

Introduction

For the first time, Dublin's four local authorities have joined together to develop Climate Change Action Plans as a collaborative response to the impact that climate change is having, and will continue to have, on the Dublin Region and its citizens. While each plan is unique to its functional area, they are unified in their approach to climate change adaptation and mitigation, and their commitment to lead by example in tackling this global issue.

These CCAPs follow on from the publication of A Strategy for Climate Change Action Plans for the Dublin Local Authorities (DLAs), which was published in January 2017. The strategy used a structured approach that focused on seven key areas (Citizen Engagement, Planning, Energy, Transport, Water, Waste, and Ecosystems & Biodiversity), and set out how the DLAs would develop the four climate change action plans. The action plans will be unique to each local authority area but synchronised in their methodology.

The actions in the CCAP are presented around a number of themes as follows:

- Energy and Buildings
- Transport
- Flood Resilience
- Nature Based Solutions
- Resource Management.

Collectively, these collectively address the four targets of this plan, which are:

- A 33% improvement in the Council's energy efficiency by 2020
- A 40% reduction in the Council's greenhouse gas emissions by 2030
- To make Dublin a climate resilient region, by reducing the impacts of future climate change - related events
- To actively engage and inform citizens on climate change.

As such, the CCAP encompasses the functional and administrative area of Dublin City.

Public consultation on the Draft Climate Change Action Plan took place over a six-week period from Monday 11th February to Monday 25th March 2019, with 234 valid submissions received in total. In addition, and in accordance with the Planning and Development (Strategic Environmental Assessment) Regulations 2004 to 2011, as amended, and Habitats Directive 92/43/EEC, a Strategic Environmental Assessment (SEA) Environmental Report and an Appropriate Assessment Natura Impact Statement, were also on public display.

Details of the Public Consultation Process

The objectives of the Draft Climate Change Action Plan public consultation process were as follows:

- Increase awareness of the Draft Climate Change Action Plan for the general public, various stakeholders, prescribed bodies, and Council staff;
- Provide opportunities for more creative and dynamic engagement with a variety of interested parties, including younger citizens, older citizens and locally based community and resident's groups;
- Increase the number, variety and quality of submissions received, appropriate to the Draft Climate Change Action Plan;
- Encourage longer term engagement strategies beyond the Draft Climate Change Action Plan stage and scope follow up activities; and
- To align with the Council's internal and external communication objectives.

The Council has used a variety of online and supporting 'face to face' methods, to consult and engage with the citizens of Dublin City Council area and a range of other stakeholders and interested parties.

- A Newspaper Notice appeared in the Irish Independent on Monday 11th February 2019 and in the Dublin Gazette on Thursday 14th February 2019. A copy of the Newspaper Notice is contained in Appendix B.
- A public consultation video was prepared on behalf of the four Dublin local authorities publicising climate actions and the public consultation process. The video was embedded on the dublinclimatechange.ie website and 30-second clips were used to promote the video on social media, with over 6,600 combined views alone on the Dublin CARO and Codema twitter accounts.
- 4,000 individual users accessed www.dublinclimatechange.ie since it was launched until the public consultation period ended (11th Feb – 25th Mar 2019).
- Codema developed a generic information leaflet (2,000 copies printed) and event programmes (500 copies printed each) for the #Councils4ClimateAction events. This material helped to provide information on the Plans and to promote what was taking place at each of the events. These leaflets were widely available online to help spread the word and cut down on the need for printed copies.
- The #Councils4ClimateAction social media campaign was particularly effective throughout the public consultation. process and for promoting the Councils' events.
- Codema acted as the central liaison point between all four Councils' Communications Teams and together a central message was formed around the plans and the 'make a submission' call to action.

- Press releases were issued by the four DLAs and Codema in the run up to the public consultation period opening and the public events, resulting in widespread national and local media coverage such as the Irish Times, RTE Television Six-One and Nine O’Clock News Bulletins, Virgin Media One News Bulletins, RTE Radio 1 and Newstalk 106-108fm.

A total of 234 valid submissions were received.

Chief executives report

A Chief Executive’s (CE) Report has been prepared which summarises, details the outcome of the public consultation programme on the Draft Climate Change Action Plan, and contains the following:

All submissions were read, analysed and summarised. A list of the persons, organisations and bodies that made submissions is provided in Appendix A of the CE Report. The categorisations and summary of issues raised, together with the Chief Executive’s response and recommendations is contained in Section 0.5 onwards. **NB:** The headings relating to the categorisation and summary of issues raised, together with the Chief Executive’s response and recommendations, follows that of the headings of the Draft Climate Change Action Plan document i.e. Section 0.5.1 Executive Summary, Section 0.5.2 Introduction, and so forth.

purpose of this Appropriate Assessment screening report

The purpose of this AA Screening report and accompanying Determination is to evaluate the requirement for AA to be undertaken on the Recommendations by the Chief Executive.

This Determination should be read in conjunction with the Chief Executive report and all other associated documents including the:

- Chief Executive’s Report on Submissions Received;
- SEA Environmental Report for the draft Dublin City CCAP;
- Appropriate Assessment (AA) Screening Report and Natura Impact Statement for the draft Dublin City CCAP.
- SEA Screening Report for the Chief Executive’s Recommendations.

Table 1.1 below lists all changes to the CCAP proposed in the Chief Executives Report. Each of these changes are screened for their potential to result in likely significant effects to European Sites. A concluding determination then provided following the assessment outlined in Table 1.1.

TABLE 1.7: SCREENING OF ACTIONS RECOMMENDED BY THE CHIEF EXECUTIVE'S REPORT

Chief Executive Recommendation	Appropriate Assessment Screening
<p>The City Council Energy Review (mid 2019) and going forward, will include a glide path illustrating the energy efficiency and GHG emission targets for the City Council up to and including 2030.</p> <p>Appendix II: Total Emissions in Dublin City of the CCAP, will also be updated every two years in accordance with EU Covenant of Mayors for Climate & Energy protocol.</p>	<p>These two actions as recommend will provide information on the energy efficiency and targets through diagrams (glide path) as well as biannual updates of total emissions. These in and of themselves do not give rise to landuse effects and will not have the potential alone, or in combination with other plans or projects, to result in likely significant effects to European Sites.</p>
<p>The City Architects Division of Dublin City Council is committed to participating with Irish Green Building Council and other European organisations in BUILD UPON 2. This is a project funded under the EU's H2020 programme and will run for two years from May 2019. It will work to develop long-term building renovation strategies, linked to EU and national policy, with the aim of delivering a highly efficient and decarbonised building stock by 2050.</p> <p>The City Architects Division of Dublin City Council is committed to participating with the RIAI in particular the Sustainability Task Force in seeking new and innovative approaches to Climate action in the built environment:</p> <p>Identify site for trialling renewable energy projects, including solar PV and Geothermal.</p>	<p>Actions relating to long term building renovation and new and innovative climate action in the built environment within Dublin City will not result in land use effects with the potential to negatively affect European Sites. The renovation of existing buildings will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.</p> <p>The identification of site for trialling renewable energy projects such as solar PV and geothermal will not in itself alone, or in combination with other plans or projects have the potential to result in likely significant effects to European Sites. It is noted that any renewable energy project progressed within any such site identified on foot of this amendment will be subject to screening for Appropriate Assessment and where required a Natura Impact Statement. In addition existing measures that aim to protect European Sites as outlined in the NIS for the CCAP and the NIR for the CDP will be required to inform the site identification process.</p>

Chief Executive Recommendation	Appropriate Assessment Screening
Develop an understanding of deep geothermal resources in Dublin through the GEO-URBAN Project', with the timeframe of 2021, and the indicators being the completion of the 'report', and the target impacted is 'Public Awareness'	The inclusion of this action in the CCAP will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites. It is acknowledged that the development of an understanding of the deep geothermal resources in Dublin may require land based research activities that involve ground penetration. Any ground penetration or drilling works required to inform the understanding of the deep geothermal resources in Dublin will be subject to screening for Appropriate Assessment and where required a Natura Impact Statement.
<p><u>New Action:</u></p> <p>The City Council will undertake a research study to investigate the Lifecycle Assessment of Traditional and New Construction Methods for Residential Projects in Dublin with a view to formulating initial recommendations by end 2019.</p>	This action will not result in land use effects and will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.
<p>Action: In all building projects, new build or retrofit, Swift Bricks or other nesting sites for swifts will be provided where practicable. The presence of swift breeding sites will be identified to ensure that known breeding sites are not lost as a result of construction work.</p>	This additional text relates to citizen engagement and awareness and does not form a specific action. Nor will it generate any land use activity and as such its inclusion in the CCAP will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.
The City Council will undertake a research study to investigate the Lifecycle Assessment of Traditional and New Construction Methods for Residential Projects in Dublin with a view to formulating initial	This action will not result in land use effects and will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.

Chief Executive Recommendation	Appropriate Assessment Screening
recommendations by end 2019.	
<p>Develop maintenance and condition survey programmes for Council owned historic and ancient monuments that are informed by climate change impacts.</p> <p>Conduct research and seek to develop City Council based case studies on appropriate and sensitive retro-fitting/energy upgrading of traditional buildings to inform works both to Council owned properties and to guide private owners</p>	<p>The above actions focus on cultural heritage, its protection and a sensitive approach to any sustainable energy upgrades to buildings of cultural heritage value. Its inclusions in the CCAP will not have the potential to result in land use effects alone, or in combination with other plans or projects that could result in likely significant effects to European Sites.</p>
<p>Amend Action 27: Develop Cycling Action Plan: 471 km of a possible cycle network.</p> <p>Cycle Network and Walking and targets</p> <p>DCC will accelerate the delivery of cycling and walking infrastructure with continuous segregation of vehicles and high levels of perceived safety. The Greater Dublin Area Cycle Network Plan has identified 471km of a possible cycle network for Dublin City. DCC will focus on the development of the greenways, primary and secondary routes while significantly improving the walking environment and creating opportunities for sojourning along the same corridors.</p>	<p>The NIS of the draft CCAP identified actions providing for the development of walking and cycling networks within the Plan area as having the potential to result in likely significant effects to European Sites. The NIS provides for a range of mitigation measures that will minimise the environmental impact of such walking and cycling infrastructure and will eliminate the potential for adverse impacts to European Sites. Provided all mitigation measures as outlined in the NIS of the draft CCAP are implemented, the inclusion of this additional action will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.</p>

Chief Executive Recommendation	Appropriate Assessment Screening
<p>Amend Action 38: Bike Parking and targets</p> <p>Actions: Dublin City Council has drafted a strategy for the provision of public cycle parking throughout the City. Since 2018, 2,100 cycle parking spaces have been provided at 110 locations and a further 2,000 spaces are proposed to be installed in 2019 at over 120 locations. Further installations will be made to provide over 20,000 public parking spaces by 2030.</p> <p>DCC will also work with relevant transport bodies and businesses to expand the availability of sheltered bicycle parking to enable people to cycle to and from key public transport nodes, and strategic destinations such as the recent installations for Drury Street bike parking facilities.</p>	<p>The NIS of the draft CCAP provides a range of mitigation measures that will eliminate the risk of adverse impacts to European Sites as a result of the development of infrastructure associated with cycling infrastructure. The implementation of these measures will ensure that the inclusion of this action will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites</p>
<p>Amend Action 39: Bike Sharing</p> <p>DCC has had immense success with the dublinbikes scheme and there is continuous demand to expand this programme, which will help to reduce emissions and provide more options for sustainable modes of transport. DCC will continue to monitor its performance and any expansions will take account of emerging business models for bikesharing.</p> <p>DCC has facilitated the expansion of bike share options through the creation of Bye Laws in 2017 for the operation of Stationless/Dockless bike share schemes. Current operator Bleeperbike now covers areas of the</p>	<p>This action to promote bike sharing within the plan area will not have the potential, alone, or in combination with other plans or projects o result in likely significant effects to European Sites.</p>

Chief Executive Recommendation	Appropriate Assessment Screening
<p>city not included in the Dublinbike Scheme making bike share an option for a wider population.</p> <p>DCC will seek an expansion of the bike sharing programme by a further 1150 bikes by the end of 2019. This expansion will also seek to include e-bikes</p>	
<p>New Action: Participation in European Commission Research Programmes</p> <p>DCC aspires to be a Future Cycling City and will collaborate with cycling cities of Amsterdam, Copenhagen and Munich to learn and share experiences in the development and promotion of cycling infrastructure. DCC will collaborate with Transport for Greater Manchester and Edinburgh in benchmarking the city's status on sustainable mobility using EC Sustainable Urban Mobility Indicators. This collaboration will leverage on European Commission Programmes. DCC will also lead local innovation and research programmes and encourage citizens and business participation in the development and deployment of sustainable transport solutions.</p>	<p>The inclusion of this action will not in itself result in land use effects and will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.</p>
<p>New Action: Baseline</p> <p>Create a baseline of Sustainable Urban Mobility for Dublin in line with EC Indicators</p>	<p>The inclusion of this action will not in itself result in land use effects and will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.</p>

Chief Executive Recommendation	Appropriate Assessment Screening
<p>DCC participates in the national Cycle Right programme bringing cycle training to pupils in primary and secondary schools throughout the city area. DCC works closely with An Taisce Green Schools on the Green Travel theme and encourages increased cycling through support for cycle training, on site cycle parking and improvements to the physical environment identified by pupils.</p> <p>Cycle Training Programme for 6th Class students / Pedal Power Labs</p>	<p>The inclusion of this action will not in itself result in land use effects and will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.</p>
<p>New Action: Partnerships:</p> <p>DCC will continue to seek new and expand on existing partnerships to encourage sustainable travel and safer travel behaviours.</p>	<p>The inclusion of this action will not in itself result in land use effects and will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.</p>
<p>New Action: Community Engagement:</p> <p>Dublin City Council will engage with local communities to develop a vision for the future of their neighbourhoods with a strong focus on local living, sustainable mobility and quality of life.</p>	<p>The inclusion of this action will not in itself result in land use effects and will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.</p>
<p>New Action: Communications and Promotion</p>	<p>The inclusion of this action will not in itself result in land use effects and will not have the potential alone, or in combination</p>

Chief Executive Recommendation	Appropriate Assessment Screening
DCC will establish a portal dedicated to communication and promotion of active travel within existing platforms.	with other plans or projects to result in likely significant effects to European Sites.
DCC is working in partnership with the EPA on expanding and enhancing ambient air quality monitoring in Dublin in accordance with the National Ambient Air Monitoring Programme DCC is exploring the feasibility of carrying out an air quality status study in Dublin port	The inclusion of this action will not in itself result in land use effects and will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.
The Council will undertake an assessment of the number of existing and potential future Electric Vehicle Charge points in its jurisdiction.	The inclusion of this action will not in itself result in land use effects and will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.
New Action: East Coast trail (10.8km in DCC area)	<p>The provision of an East Coast Trail will have the potential to result in interactions with European Sites that could result in negative effects to the qualifying habitats and/or qualifying species for which these sites are designated. As such likely significant effects to European Sites arising from the construction or operation phase of the East Coast Trail cannot be ruled out at this stage.</p> <p>A range of mitigation measures are outlined in the draft CCAP and these measures should be implemented as a basis to ensure that adverse effects to these European Sites are avoided during the design, construction and operation of the East Coast Trail.</p>
Action 37: Survey possibly by Drones/Satellites of paved	This action will assist in gathering baseline information relating to

Chief Executive Recommendation	Appropriate Assessment Screening
areas in the City.	permeability and soil sealing and will not in itself have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.
Action 38: Environmental Surveys of all of City rivers and estuaries as baseline surveys.	This action will not in itself result in land use effects and will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites. The results of baseline surveys will provide important information against which future projects can be screened for impacts to rivers and estuaries, the majority are designated or are linked to designated European Sites
Action 19: Risk workshops to assess likely impacts on Council services.	This action will not result in land use effects and will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.
Action 39: Increase funding for Gully Cleaning in the city	The inclusion of this action will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.
Action 5: Produce a new Design Guide for SUDS and Green Infrastructure	The inclusion of this action will have the potential to result in positive implications for European Sites by improving water treatment standards during the construction and operation phase of future developments.
Action 30: Implement the North East Inner City and	The inclusion of this action will not in itself result in land use effects that could interact with European Sites. This action will not

Chief Executive Recommendation	Appropriate Assessment Screening
<p>Liberties Greening Strategy.</p> <p>Action 33: Assess feasibility of additional green space for local food production including community gardens and urban orchards.</p>	<p>have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.</p>
<p>Action 11: Continued support of development of the Greenways concept for: Dublin Bay, Dodder, Santry, Liffey, Tolka and Camac.</p>	<p>The provision of walking and cycle ways such as greenways has been identified in the NIS of the draft CCAP as having the potential to result in likely significant effects to European Sites. The NIS of the draft Plan provides mitigation measures that aim to ensure the provision of greenways within the plan area do not result in adverse effects to European Sites. Provided all mitigation measures outlined in the NIS of the draft CCAP are implemented the inclusion of this action will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.</p>
<p>Action 31: Develop urban woodland strategy as part of DCC Tree Strategy</p> <p>And the following new</p>	<p>These actions and additional text will not in themselves result in land use effects. Their inclusion in the CCAP will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.</p>
<p>Action is proposed to the Draft CCAP:</p> <p>Analyse climate change impacts on City's trees to inform management.</p>	<p>These actions and additional text will not in themselves result in land use effects. Their inclusion in the CCAP will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.</p>

Chief Executive Recommendation	Appropriate Assessment Screening
<p>Action 7: Collect data to inform the preparation of a list of habitats and species in Dublin City vulnerable to climate change. Devise measures for reducing risks to these habitats and species locally and implement and evaluate their effectiveness</p> <p>Action 21: Provide data to RAMSAR Committee for Ireland on wetlands in Dublin City.</p> <p>Action 39: Engage with business community to develop sustainable business initiatives for Dublin Bay UNESCO Biosphere Business Strategy.</p>	<p>The inclusion of these additional actions in the CCAP will have positive implications of European Sites and the qualifying habitats and species.</p>
<p>Action 8: Amend to read: Promote programmes to advise businesses on reducing waste e.g. Eco-Merit</p>	<p>This amendment will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.</p>
<p>Action 9: Amend to read:</p> <p>Promote recycling and the circular economy to householders through a range of workshops, talks and programmes.</p>	<p>This amendment will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.</p>
<p>Action 13: Amend to read: Support and promote litter</p>	<p>This amendment will not have the potential alone, or in combination with other plans or projects to result in likely</p>

Chief Executive Recommendation	Appropriate Assessment Screening
clean-up days and initiatives	significant effects to European Sites.
Action 20: Support and promote Tidy Towns/Green Schools/City Neighbourhoods initiatives and Local Agenda 21 Initiatives	This amendment will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.
The Local Authority will work with the Local Authority Waters Programme in its support of communities and stakeholders in the delivery of local water quality projects and initiatives	The draft plan as published has been subject to a Natura Impact Statement; providing all the measures outlined in the NIS are implemented, there will be no significant adverse effects to European Sites within the zone of influence of the Draft CCAP. This amendment will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites
The City Council will carry out further research to engage with stakeholders to promote and develop business supports to encourage reduction of emissions and other climate driven actions, and to develop targets that could be measured on progress being achieved	This text sets out the potential leadership role the business community can play in addressing climate change and positions the CCAP to support the business community in delivering actions to address climate change. No specific land use measures are outlined in this text and its inclusion in the plan will not in itself have the potential This amendment will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites to result in likely significant effects to European Sites.

Screening Conclusion & determination

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

The Action for "East Coast Trail" has been identified as having the potential to interact with European Sites and the potential for likely significant effects to occur cannot be ruled out. The Natura Impact Statement of the draft CCAP outlines a range of mitigation measures that aim to avoid significant adverse effects to the Conservation Objectives and integrity of European Sites that could arise through the provision of walking and cycling routes in the plan area. These mitigation measures, once applied to the East Coast Trail action will also provide appropriate safeguards that will ensure the inclusion of this Action within the CCAP will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites to result in adverse effects to the Conservation Objectives or integrity of European Sites.

The NIS of the final CCAP will require updating so that the East Coast Trail action is identified as having the potential to result in likely significant effects to European Sites.