



CHIEF EXECUTIVE'S REPORT
ON SUBMISSIONS RECEIVED

FINGAL COUNTY COUNCIL
**DRAFT CLIMATE CHANGE
ACTION PLAN 2019-2024**

MAY 2019

Public Consultation Process	1
Background	1
Public Consultation	2
CCAP Executive Summary	10
CCAP-Introduction	11
Submissions Re Covenant of Mayors	11
Submissions Re Development Plan Objective EN23	11
Submissions Re CCAP development and CCAP Targets	13
Submissions Re Review of Energy Targets	14
Submissions Re Local Authorities as Leaders in Action on Climate Change	15
Milestone 1: Initiate	16
Milestone 2: Research	18
Submissions Re Partnership and Collaboration with other Local Authorities	19
Submissions Re Partnership and Collaboration with the Business Community	19
Submissions Re Citizen and Community Engagement	20
Submissions Re: The Science of Climate Change, support for Renewable Energy projects, Public Authority leadership, CCAP iteration, and developing best practice.	22
Milestone 3: Plan	25
Actions on Energy & Buildings	26
Energy Awareness	26
Energy Efficiency & Renewables	28
Energy Planning	31
Research & Innovation	33
Submissions Re New buildings to include renewable energy technologies / green roofs	33
Submissions Re Financing Building Energy Upgrades	34
Submissions Re Micro-generation in Dwellings and Non-domestic dwellings	36
Submissions Re Embodied Carbon	36
Submissions Re Energy Performance of Public/Private Buildings	37
Actions on Transport	39
Staff Travel	39
Operations	40
Integration of Spatial Planning & Transport	42
Active Travel & Behavioural Change	44

Public Transport	50
Miscellaneous	51
Submissions Re Carbon Offsetting.....	53
Submissions Re Modal Shift.....	53
Submissions Re Park and Ride facilities	54
Submissions Re Electric Vehicle Charge Points.....	54
Submissions Re Bike to work scheme	55
Submissions Re Dublin Airport/Aviation transport emissions.....	55
Submissions Re Bus Technology – Electrification	56
Submissions Re Air Pollution from older bus fleet	57
Submissions Re Electric Vehicle Grants	58
Actions on Flood Resilience	59
Flood Risk Management	59
Flood Defence	61
Chief Executive’s Proposed Amendment to Update Draft Plan	62
Submissions Re Irish Water as a stakeholder	62
Actions on Nature Based Solutions:.....	64
Green Infrastructure	64
Conservation & Preservation	65
Tree Management	68
Miscellaneous	69
Submissions Re Afforestation	70
Actions on Resource Management.....	71
Procurement	71
Waste Management	72
Litter & recycling in the public realm.....	73
Awareness.....	74
Miscellaneous	78
Submissions Re Waste Management & Waste Collection Issues	80
Submissions Re Role of LAs in Deposit and Return Scheme.....	80
Submissions Re Banning single use plastic	80
Submissions Re Climate Action Workshops for Tidy Towns Groups	81

Milestone 4: Implementation:	82
Submissions Re Draft Plan should set out possible other funding sources for climate actions	82
Submissions Re CCAP implementation	83
Submissions Re Developing best practice in climate change	84
Submissions Re Wider Climate Change Agenda and Urban Sustainability	84
Submissions Re Interaction with Sectoral Climate Change Issues	85
Submission Re Just Transition	86
Milestone 5: Monitoring & Iteration:	87
Chief Executive's Proposed Amendment to Update Draft Plan	87
Submissions Re CCAP Future Iterations	87
Submissions outside of main themes:	89
Submissions Re Carbon Tax	89
Submissions Re Addressing climate change in other sectors	89
Submissions Re Health Effects of Climate Change Actions	90
Submissions Re Directly Elected Mayor	90
Submissions Re Climate Refugees	90
Submissions Re Friends of the Irish Environment v the Irish Government	91
Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)	92
Recommended Mitigation Measures for Fingal CCAP	102
General Comments	104
Chief Executive's Proposed Amendment to Update Draft Plan	104
Summary of CE Proposed Amendments	106
CCAP Introduction	106
Milestone 2: Research	106
Actions on Energy & Buildings	108
Actions on Transport	108
Actions on Flood Resilience	108
Actions on Nature Based Solutions:	109
Actions on Resource Management	110
Milestone 4: Implementation:	110
Milestone 5: Monitoring & Iteration:	110
Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)	111

Minor Text changes.....	112
Appendix A - List of Persons, Organisations and Bodies who made Submissions.....	114
Appendix B - Images of Public Consultation Material.....	119
Appendix C - Newspaper Notice	122
Appendix D - SEA AA Screening Determination	125
Appendix E - Emissions Trading Scheme.....	126
Appendix F - Greater Dublin Area Transport Strategy 2016 – 2035	128

Public Consultation Process

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

Under the National Adaptation Framework 2018, the Council is only required to prepare a plan for adaptive actions. However, the Council and the other Dublin Local Authorities (DLA) have gone beyond this by including (a) mitigation actions for Council buildings and operations and (b) actions for significant community awareness and engagement.

The Council undertook public consultation on the Draft Plan from Monday 11th February to Monday 25th March 2019. A total of 120no 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 relevant 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 Fingal County Council for consideration.

Background

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

In the Dublin Metropolitan Region, the four Dublin Draft Climate Change Action Plans have been prepared in partnership with Codema (Dublin's Energy Agency), following extensive and ongoing engagement between the four Councils throughout 2017/2018. The Draft Climate Change Action Plans addresses 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.

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 120 valid submissions received in total.

In addition, and in accordance with the Planning and Development (Strategic Environmental Assessment) Regulations 2004 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 community engagement, older citizens and locally based community and resident's groups;
- Increase the number, variety and quality of submission received, appropriate to the Draft Climate Change Action Plan;
- Encourage longer term engagement strategies beyond the Draft Climate Change Action Plan stage and scope follow up activities; and
- To align with the Council's internal and external communication objectives.

The Council used a variety of online and supporting 'face to face' methods, to consult and engage with the citizens of Fingal and a range of other stakeholders and interested parties including:

- A Newspaper Notice appeared in the Irish Times on Monday 11th February 2019. A copy of the Newspaper Notice is contained in Appendix C.
- 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 use of social media 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.
- Presentations were made to the Environment and Water Services SPC , Full Council and Public Participation Network.
- 5 no. workshops were held for Transition Year students in 5 schools, facilitated by Global Action Network (GAP).
- An internal information campaign was run for Council staff.

Public Information Drop-In Events

The Council held 4 Public Consultation Drop-In Events as follows:

Swords Launch

A CCAP Public Consultation Launch Event was held on Monday, 18th February 2019, Atrium, County Hall, Swords 5.30pm – 8.30pm.

- 70no attendees approximately.
- External stakeholders represented at tables included: SEAI (Energy), GoCar, BleeperBike, BMW (Transport) and Stop Food Waste / EPA Mater Composters (Resource Management), Cool Planet Carbon Calculator.



Photographs from Swords Public Consultation Event held by Fingal County Council

Fingal County Council hosted three local Public Information Events as follows:

Balbriggan:

Bracken Court Hotel in Balbriggan on Wednesday 20th February 2019. 33 no attendees approximately.



Blanchardstown:

Crowne Plaza, Blanchardstown on Monday 25th February 2019, 25no attendees approximately.



Sutton:


Marine Hotel, Sutton on Thursday 28th February 2019, 35no attendees approximately.




Five Climate Action Workshops facilitated by Global Action Network (GAP) were also held with Transition Year students throughout the County at the following schools:

School	Date	
Loreto College, River Valley Swords	12th March 2019	A photograph of a group of students sitting at tables in a room, participating in a workshop. They are looking towards the front of the room where a presentation is being given. The room has a green carpet and large windows.

<p>Malahide Community School</p>	<p>13th March 2019</p>	
<p>Blakestown Community School, Blanchardstown</p>	<p>15th March 2019</p>	

School	Date	
<p>Loreto Secondary School Balbriggan</p>	<p>19th March 2019</p>	<p>Loreto Balbriggan @lorbainews · 22h The 4E class took part in an engaging Climate Change Workshop with past pupil Clara McKenna @Fingalcoco and Aine @gapireland. The students got a chance to discuss ideas for submission to the Draft Fingal Climate Change Action Plan.</p> 

<p>Fingal Community College, Swords</p>	<p>21st March 2019</p>	
--	-------------------------------	--

Details of the Submissions

Introduction

A total of 120 valid submissions were received, the breakdown of submissions is as follows:

Overview of Submissions received

Online Portal Submissions	44
Email Submissions	62
Posted / Handed Submissions	14
Total Submissions	120

All 120 valid submissions received by the Council were read and analysed. They translated into 385no discrete comments.

The issues which were raised most frequently related to Transport followed by Energy & Buildings.

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 the following chapters. **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.

General Comments on nature of Submissions received and Issues raised

Nearly all submissions were supportive of the necessity to take actions in relation to climate change. Most submissions raised several different issues.

What is clear is that submissions were made in the context of a persons views on climate change generally, not necessarily directly related to the text and actions in the Draft Plan. Similarly the actions proposed relate to what is considered necessary at all levels of government - local, national, EU – and society to tackle climate change and not directly related to the Draft Plan. Many of the issues raised relate to subjects for other processes such as the Development Plan process and NTA strategic plans.

Consequently, it has been complex to categorise and report on the submissions in the context of the Draft Plan as published for consultation. Broadly speaking the issues raised could be summarised as:-

- Issues directly relating to an issue or action in the Draft Plan.
- Issues related to general climate change issues but not specifically relating to the responsibilities of local authorities .eg. carbon tax, electrification of buses, addressing climate change in other sectors, banning single use plastics etc.
- Issues not related to climate change but related to some Council and non-Council activities such as litter, litter bins, cameras, street cleanliness, street lighting, bus stops, toll reductions for electric vehicles, reusable bags in supermarkets etc.

The issues not related to climate change have not been responded to in this Report but if relevant to the Council and specific to an area or location will be referred to the appropriate Council Department for their attention.

The Chief Executives Responses to Issues have been collated and presented in the same order as the Chapters and Sections of the Draft Plan, in 2 Parts for each Chapter or Sections, as follows:-

Part 1: FCC submissions with summary responses

Relevant submissions made to Fingal.

Part 2: FCC & DLA Submissions with specific responses

Relevant submissions to Fingal and across DLA, where it is felt a specific response may be more informative. As the Main Text of the Draft Plan was prepared in co-ordination with the rest of the DLA to promote a regional approach to climate change, it is considered that reference should be included to some of the issues raised with other Councils which have a regional dimension.

There is some overlap between the issues raised in Part 1 and Part 2 of each Chapter.

For ease of reference Actions in the Report are preceded by reference to the initials of the Action Area eg. Action No. 1 in Energy & Buildings is referenced as Action EB1.

It is proposed that the submissions will be considered again in the context of the Year 1 Review of the Actions in the Plan, as policy and context may have evolved.

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.

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.

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

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

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

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 in italics*, for example:

“The implementation, monitoring and future updates of the Climate Change Action Plan will 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 ~~with strikethrough~~.

CCAP Executive Summary

No submissions were received under this chapter

CCAP-Introduction

Part 1: FCC submissions with summary responses

Submission No	Comment Summary
45	Weak in terms of how local Government can act as a champion and administrator for targeted actions to execute a transition to a low Carbon economy.
73	Breaking of the international commitment on Covenant of Mayors we as a county made is extremely regrettable.
73	Fingal Development Plan, there is a clear statement in the Climate Change Mitigation and Adaptation Strategy "...will include targets for emissions reduction from the County" (EN23
111	Establish realistic targets for emissions reductions

Chief Executive's Response

Submissions Re Covenant of Mayors

Fingal along with the rest of the DLA is a signatory to the Covenant of Mayors which proposes a cut in GHG emissions by 2030. The Covenant is voluntary and flexible and while the ultimate aim is to get overall emissions down by 40%, it is recognised that there is no '*one size fits all*'. Many municipalities throughout Europe have much more authority - legally, financially and politically - in the key sectors related to GHG emissions, transport and energy. They can have a much bigger impact than the local authorities in Ireland which have a limited range of functions compared to European models.

Codema on behalf of the DLA has been in contact with the Covenant of Mayors on this issue and the Covenant has advised that the approach being taken by the DLA is acceptable. See Milestone 5 Covenant of Mayors text.

Submissions Re Development Plan Objective EN23

Objective EN23 of the Fingal Development Plan 2017-2023 states:-

"Establish a Climate Change Adaptation Team within Fingal County Council to prepare a Climate Change Mitigation and Adaptation Strategy with relevant stakeholders, Dublin Local Authorities and various interest groups. The Climate Change Mitigation and Adaptation Strategy will include targets for emissions reduction from the County; provision for reporting on progress in reducing emissions; and a process of engagement with citizens, businesses and civil society in relation to the changes required."

While the Objective is noted, Fingal does not have the legal or statutory standing to develop and implement an all of county climate action plan which can require, enable or enforce targets for emissions reductions in other sectors. The national policy requirement on Fingal is to publish a climate adaptation plan. What has been published by the Fingal and the DLA has gone much farther than this by including internal mitigation actions and public awareness/engagement actions. Fingal and the DLA propose to have a leadership role at a local and regional level and have committed to working with and influencing other sectors in the transition to low carbon.

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.

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

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 CCAP. This matter should be primarily addressed at a national level, in advance of addressing such issues at a local authority level.

As the CCAP will be completed in advance of the finalisation of approval of all twelve sectoral adaptation strategies, it is proposed in another response 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 Recommendations

NO amendments necessary for Text or Actions

Part 2: FCC & DLA Submissions with specific responses

Submissions Re CCAP development and CCAP Targets

Chief Executive's Response

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 Councils, 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

NO amendments necessary for Text or Actions.

Submissions Re Review of Energy Targets

Chief Executive's Response

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

NO amendments necessary for Text or Actions.

Submissions Re Local Authorities as Leaders in Action on Climate Change

Chief Executive's Response

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 Fingal a more climate resilient county. The Draft Plan includes a range of ongoing and planned actions, across Council Departments, including actions relating to renewable energy projects. Having regard to supporting other renewable energy projects including hydropower, solar etc., these are primarily supported by the Council, by way of the policies and objectives included in the Fingal Development Plan 2017-2023 and other plans and strategies.

Chief Executive's Recommendation

NO amendments necessary for Text or Actions.

Milestone 1: Initiate

Part 1: FCC submissions with summary responses: No submissions received

Part 2: FCC & DLA Submissions with specific responses

Submissions relate to planning holistically for the wider climate change agenda, urban sustainability and quality of life for all citizens, wildlife and biodiversity in Fingal and the Dublin region.

Chief Executive's Response

The Draft CCAP demonstrates 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 objective of the Council to develop and implement actions that can be replicated by citizens, businesses, and other stakeholders. It is also a strong objective of Council to take a leadership role to contribute to the wider sustainable development of the county and region, 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 greenhouse gas emissions reduction and enhancing resilience to the impacts of climate change.

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

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 CCAP.

Chief Executive's Recommendation

NO amendments necessary for Text or Actions.

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

Chief Executives Response

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.

Milestone 2: Research

Part 1: FCC submissions with summary responses

Submission No	Comment Summary
37	It appears the City Council has a perception of climate risk that goes beyond that perceived by the Government or by the EU
61	Integrated Construction Wetlands - recommend using the GSI's National Aquifer and Recharge maps
61	Coastal Vulnerability Index: identify the coastal regions most likely to be affected by impacts of sea-level rise
69	the plan should have a more detailed breakdown of the key areas generating emissions to better inform planned actions to address these
71	Re-assessing the Scientific Basis of the Plan
72	In Table 3 – Extreme Weather Events Risk Matrix, there is merit in including Population /
73	outline initial measures that Fingal will take to support the achievement of this 40% county wide figure
110	What does the figure of 11,095 tonnes CO2 mean? Should it be corrected / clarified as the Council's own operational impact? If so perhaps it would be more appropriate to also reference the data from all public and private overall sources within the council area. The figures seem disproportionate to the 2016 Ireland emission figure 68,550,000 tonnes CO2 estimated by EPA April 2018.

Chief Executive's Response

The methodology used to assess climate risk in the Draft Plan is in line with best international practices

The baseline in the plan is based on real energy use and associated emissions for the council that are annually submitted and verified by SEAI.

Re impacts of extreme weather events, population changes are included in the adaptation baseline, highlighting the fact that a rise in population will increase the impacts of climate change due to additional pressure on drains and housing, which will lead to a decrease in pervious surfaces and thus exacerbate flooding due to run-off.

The Draft Plan has been written especially to focus on the remit of the Council and what is directly under its control. By setting such ambitious targets for the Council it is hoped that it can become a climate leader to influence the rest of the county. The Council is also a signatory of the Covenant of Mayors which aims to reduce emissions across the public and private sector by 40% by 2030. Fingal

will contribute to this through increasing public awareness of climate change and working with other sector where possible. In addition, Codema is currently developing a Climate Change Energy masterplan for the whole county which will help build real scenarios for emission reductions in both the public and private sector. This can be used as a planning tool to inform future planning policy in relation to climate change.

The figure of 11,095tCO₂ is the total emissions in 2017 from the Council owned buildings and public lighting. It is clearly stated that this figure is FCC's own buildings and public lighting accounts.

Part 2: FCC & DLA Submissions with specific responses

Submissions Re Partnership and Collaboration with other Local Authorities

Chief Executive's Response

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

NO amendments necessary for Text or Actions.

Submissions Re Partnership and Collaboration with the Business Community

Chief Executive's Response

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. It is considered that this is worth noting in the text of the Draft CCAP.

Chief Executive's Recommendation

INSERT NEW TEXT in Public Awareness Section:-

“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, through the 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.”

Submissions Re Citizen and Community Engagement

Chief Executive’s Response

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

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

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

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

It is recognised that there is a need to foster and build momentum on wider citizen engagement in climate change, across all age groups. Local authorities have significant experience in engaging citizens through their existing functions, including land-use planning, housing, water quality, employment, transport and environmental efficiency 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

INSERT NEW TEXT under 'Public Awareness' section:-

"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.”

Chief Executive's Amendment & Recommendation

For clarity, AMEND Text in Extreme Weather Risks section, Page 30 2nd para:-

“As shown in the Timeline of Major Climatic Events (Figure 4), ~~the frequency of~~ prolonged extreme cold spells in Ireland has increased, and in the Dublin Region there are additional risks due to these extreme temperatures. During Storm Emma, prolonged periods of cold resulted in water pipes freezing and then bursting as the temperatures started to rise, which left homes in the County without water.”

Submissions Re: The Science of Climate Change, support for Renewable Energy projects, Public Authority leadership, CCAP iteration, and developing best practice.

Chief Executive's Response

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 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 the county 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 Fingal Development Plan 2017-2023 and other plans and strategies.

Re submissions relate to the future iterations of the CCAP, the Draft CCAP Milestone 4 relates to Implementation and Milestone 5 relates to Monitoring and Iteration. The Council has established 2 cross-departmental Climate Teams who will be responsible for implementing the Actions included in the CCAP. The development and implementation of CCAP actions will be supported by both Codema and the Dublin Climate Action Regional Office. Codema will provide ongoing support to the CCAP in the areas of research, planning, technical assessment, cost benefit analysis, procurement, project management, funding applications and communications. The Dublin CARO will work with all four Dublin local authorities in implementing CCAP actions, including developing research opportunities and pilot project across the four Dublin local authorities. The CARO will also have a role in reviewing action implementation across the four Dublin local authority CCAPs.

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

implementation progress of the Plan. Participation in the Covenant of Mayors will also facilitate access to best practice project and benchmarks of excellence initiatives across Europe.

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

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

Chief Executive's Recommendation

NO amendments necessary for Text or Actions.

Milestone 3: Plan

Part 1: FCC submissions with summary responses

Submission No	Comment Summary
79	Please research Project Drawdown on actions to take

Chief Executive's Response

This resource is noted for future reference.

Chief Executive's Recommendation

NO amendments necessary for Text or Actions.

Actions on Energy & Buildings

Part 1: FCC submissions with summary responses

Subgroupings

1. Energy awareness
2. Energy efficiency & renewables
3. Energy Planning
4. Research & Innovation
5. Actions awaiting budget

Energy Awareness

Submission No	Comment Summary
23	Include targets for carbon emissions reductions across all of Fingal
33	more could be done to inform and advise citizens on the retro-fitting and upgrading of insulation to achieve energy efficiency. For instance, an information and advice service on the available grants and assistance with applications. Consider setting up or assisting the setting up of local Energy Companies,
46	Home insulation information events in community centres in Fingal
55	More awareness in schools and buildings in relation to energy
56	Community centres acting as sustainable hubs of communities
64	Develop a one stop shop for members of the public to seek assistance in improving their energy efficiency
66	Promotion of energy kits & energy workshops for the public
69	I think there needs to action around increasing awareness of energy savings kits among people in Fingal area
73	a separate action point on encouraging the use of renewable energy should be included in the Climate Action Plan,
74	Continuous energy efficiency retrofit displays in community centres
74	Encourage ex council tennants to carry out energy efficiency retrofits of their

	housing
115	<p>It is very welcome that the Plan has a detailed engagement with reducing the Council's own emissions in line with the commitment to the Covenant of Mayors. The County Council's own emissions are estimated at 2% of Fingal's emissions.</p> <p>However, the target adopted in the Covenant of Mayors is for emissions from the entire County. Considerable extra work is required in order to develop actions to reduce emissions from the other 98% which are not direct emissions from the Council. The Action Areas in the Plan should form the basis for developing actions within the County, informed by the Council's policies and by the public participation approach recommended above, to drive the mitigation and adaptation changes required.</p>
117	<p>Private citizens and public bodies that are trying to make their homes and buildings more energy efficient need access to expert advice and guidance from an independent source. Each county needs to have such an independent, not for profit body along the lines of the Tipperary Energy Agency.</p>

Chief Executive's Response

The Draft CCAP includes 5 relevant Actions:-

EB1 Create Energy Master Plan for the Dublin Region.

EB28 Monitor and develop the Home Energy Saving Kits scheme in Fingal Libraries.

EB29 Annual energy awareness event.

EB30 Promote and support SEAI's Better Energy Communities and Sustainable Energy Communities.

EB32 Expand tenant induction programme to include tenant energy awareness.

EB33 Install high visibility PV panels on suitable Council roofs such as libraries and community buildings.

The Draft CCAP focuses on Actions which are within the remit and control of FCC. Emission reduction targets for the entire county including for other sectors are outside the remit of the Council and as such are not included in this Plan. The Covenant of Mayors is voluntary and flexible. There are different models of local authorities across Europe and Irish local authorities have a much smaller range of relevant functions than European counterparts. The approach being taken by the Fingal and the other DLA councils has been discussed with the Covenant of Mayors and it is acceptable to them.

Sectoral Adaptation Plans are due by September 2019. An *All of Government National Energy & Climate Plan 2021-2030* should be submitted to the European Commission by 31st December 2019,

and that plan should define a national pathway to achieve emissions reductions in line with our National obligations.

Codema is currently developing a Climate Energy Masterplan for the region which will help model scenarios for emission reductions in both the public and private sector. This is expected to be completed by end 2020.

The Council aims to lead by example in meeting the targets set out in this Plan, actively engage & inform citizens, put policies in place which are conducive to emissions reductions and help put infrastructure in place to enable citizens make more sustainable choices.

This is the 1st iteration of the Plan. The Plan will be updated on an annual basis having regard to Government policy and Sectoral Plans and there may be scope to engage more broadly with stakeholders to influence GHG emissions reductions in future iterations as policy develops.

The Council will raise awareness and encourage the use of renewables by install high visibility PV panels on suitable Council roofs such as libraries and community buildings, and promoting SEAI programmes and grants with businesses and communities.

The SEAI is the lead state agency responsible for improving awareness of home energy efficiency measures and manage the distribution of domestic energy efficiency grants. The Council has an extensive retro fitting programme for social housing stock. The Council will promote SEAI programmes and engage with SEAI to help develop education programmes for the SME sector. The use of community centres as sustainable hubs will be considered as part of the implementation of Plan.

The suggestion in relation to the need for more agencies which can provide expert advice and guidance to homeowners and businesses in relation to energy efficiency upgrades is recognised. This is a matter for Government and SEAI and would require significant funding. It may be addressed in the National Energy & Climate Plan 2021-2030.

Chief Executive's Recommendations

Consider issues above where relevant as part of the development and implementation of Actions EB1, EB28, EB29, EB30, EB32, EB33.

NO amendments necessary for Text or Actions.

Energy Efficiency & Renewables

Submission No	Comment Summary
35	Hynestown reservoir pilot hydro electricity scheme
64	Energy Efficiencies Community Centres and Libraries
64	Ensure lights in offices are switched off after hours

68	Ervia recommends that the Council should consider the opportunity to use brown bin wastes from the County as feedstocks in anaerobic digestion plants to produce renewable gas.
80	Street lighting could be converted to solar fuelled battery cells, which would greatly reduce energy consumption.
81	<p>The following observation is proposing that Dublin consisting of all its Local Government Areas become a leader in renewable energy production based on Solar PV and Wind</p> <p>A concerted effort needs to be made across public and private entities within Dublin to maximise the energy potential of Solar. As the local governing bodies in Dublin all Dublin councils need to be play a role both as a leader implementing this solution but also as the owner of the counties development plans to ensure all organisations make a concerted effort to exploit available roofspace to generate electricity.</p>
82	We propose to, for point 21 in the plan, to get all computers and electrical devices programmed to have an automatic shutdown. This can be used for all businesses, schools and workplaces in the Fingal Area.
94	<p>Reduce Street Lighting/Light Sensors</p> <p>In Balbriggan and across the County it has been noted that Fingal County Council is upgrading existing street lamps to use energy efficient LEDs instead. This is a welcome change, however, it would be a further welcome upgrade if street lamps were fitted with motion sensors so that street lamps only consume energy on a “need-be” basis, i.e. when people are about. In addition, the amount of lighting in certain areas should be reduced. For example, along coastal ways or in parks, lighting is unnecessary and can attract anti-social behaviour. Light pollution is also a problem for eco-systems. Certain birds use natural light for navigation purposes. Reducing the amount of artificial light, especially along coastal ways, will eliminate confusion for birds when navigating between nest and water and reduce the number of deaths that are a direct result of light pollution.</p>
108	Great idea in draft plan to shut down all Fingal buildings of electricity and computers at certain times. This could be extended out to all public houses especially during the period of March to Oct when we have so much brightness.
111	Energy upgrade to existing local authority housing stock
111	Promote renewable energy sources in the county e.g. heat exchangers, solar, wind (if feasible)
116	I recommend the use of Sensor Lighting in Office spaces i.e. Landings, irwells and Hallways

Chief Executive's Response

The Draft CCAP includes 8 relevant Actions:-

EB 9 Procure upgrades through an Energy Performance Contract for County Hall (Swords) and Civic Offices, Draíocht Arts Centre and public library in Blanchardstown.

EB15 Refurbishment programme for Fingal Corporate buildings to include energy reviews and retrofits as standard.

EB16 Boiler replacement programme in social housing stock underway.

EB 17 Insulation of all Council owned social housing stock; extended to include acquisitions and long term leasing where feasible.

EB 18 LED lighting changeover of social housing voids and tenant changeover.

EB 19 Complete single glazing replacement programme in social housing stock and extend to include long term leases and acquisitions.

EB 20 Conduct a pilot to deep retrofit social housing voids to inform potential for roll out for all stock.

EB21 Automatic shutdown of computers and lighting in all of Fingal's offices and depots.

EB33 Install high visibility PV panels on suitable Council roofs such as libraries and community buildings.

With regard to the Council becoming a leader in renewable energy production, the Council aims to lead by example in terms of utilising renewables to improve energy efficiencies, and will promote PV by installing PV panels on suitable Council roofs. However, as the Council is not a utility, it does not develop large scale power generation projects. Decarbonisation of the national grid is a matter for Government policy. Renewable energy projects are supported in the Fingal Development Plan 2017-2023 and by the development management processes.

The Council cannot ensure all organisations exploit roof space for PV as it does not have the remit or statutory basis to do so. 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. It is not within the remit of the CCAP to introduce additional building standards that would serve to duplicate or exceed the requirements of the national standard.

FCC will complete LED upgrades of all street lighting by 2021. Usage of motion sensors and reducing the number of streetlights is a matter for future consideration but can have implications for other areas such as public security and safety for example.

Chief Executive's Recommendations

Consider issues above where relevant as part of the development and implementation of Actions EB9, EB15, EB16, EB17, EB18, EB19, EB20, EB21, EB33.

NO amendments necessary for Text or Actions.

Energy Planning

Submission No	Comment Summary
25	Use the power of the wind. - apply for Horizon 2020 grants to help with this
32	houses built within the Fingal area should not be granted planning permission unless a condition is met where the houses in question are built with solar panels
42	The Council should require the inclusion of electric charging points in all new housing, private or public and include requirements for a network of charging points for any new development in future Local Area Plans
44	there is no mention of geothermal energy systems in the entire paper.
46	I would like to see car charging point being rolled out with new housing initiatives as much as possible and a plan as to how Fingal County Council might tackle retro fitting car charging stations in older estates.
48	On examination of the draft action plan, the buildings and energy chapters I do not see any reference to embodied carbon or materials.
52	address again the absence of wind turbines in the county.
67	“Support the agricultural sector when developing anaerobic digestion plants in the region.”
67	Examines renewable gas as an option to decarbonise the region’s housing stock.
67	Considers the carbon reduction benefits of converting properties in the region from oil heating to gas heating.
67	Supports the development of new CNG refuelling infrastructure in the region.
68	Support the introduction of anaerobic digestion plants in the County to produce renewable gas from the agriculture sector and municipal brown waste.
73	Exceed current Bregs for new builds

73	through the planning process, work to encourage developers to build more energy efficient houses and also promote the upgrading of existing homes
75	To accelerate the development of renewable energy projects, streamlining and simplifying the planning permission process
79	o More electric car points – Can we challenge the % of points in the new builds – e.g. 50% of car parking should have
111	Undertake life-cycle assessments as part of all local authority schemes
111	Participate in BREEAM CEEQUAL or similar for development projects

Chief Executive's Response

The Draft CCAP includes 4 relevant Actions:-

EB2 Prepare Fingal Sustainable Energy and Climate Action Plan.

EB3 Prepare Local Authority Renewable Energy Strategy.

T11 Promote the installation of EV charge points in curtilage, for all new house constructions in Fingal.

T24 Expand the availability of EV charge points in towns and villages in line with national policy as it develops.

RM1 Implement green procurement where feasible starting with office consumables.

With regard to exceeding the National Building Regulations and conditioning the use of PV, 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. 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 national standard.

With regard to renewable energy generation, as the Council is not a utility it is not responsible for developing large scale power generation projects. However, the facilitation of renewable energy projects is supported In the Fingal Development Plan 2017-2023.

With regard to geothermal energy, the Draft CCAP is not technology specific. Geothermal energy is not excluded and has not been developed into an Action in the current iteration of this Plan. However, the Council explores all options when developing energy solutions for it's services, including geothermal sources.

The Council is working with the other Dublin Local Authorities on a continuing roll out of EV charging points in the public realm. A significant roll out of public charging points will require Government policy and funding.

With regard to embodied carbon, the current iteration of the plan concerns GHG emissions from the Councils services. The measurement of these are in line with both our commitments to the Covenant of Mayors and our National obligations. The lifecycle of materials in terms of emissions has not been taken into account in the target and baseline. However, this is something the Council is very aware of and is reflected in the RM1.

The agricultural sector is supported in developing anaerobic digestion plants through the Fingal Development Plan 2017-2023 and the development management process.

The use of renewable gas as an option to decarbonise the region's housing stock is a national policy issue.

The suggestions in relation to BREEAM CEEQUAL and life-cycle assessments of all local authority schemes will be referred to Architects and Planning Departments for consideration.

Chief Executive's Recommendations

Consider issues above where relevant as part of the development and implementation of Actions EB2, EB3, T11, T24 and RM1.

The suggestions in relation to BREEAM CEEQUAL and life-cycle assessments of all local authority schemes will be referred to Architects and Planning Departments for consideration.

NO amendments necessary for Text or Actions.

Research & Innovation

25	Use the power of the sea around us - Research partner with university
----	---

Chief Executive's Response

As the Council is not a utility, it is not responsible for developing large scale power generation projects. Decarbonisation of the national grid is a matter for Government policy. However, the Council, in association with CARO and Codema, is interested in facilitating renewable energy generation research projects should the opportunity arise. This principle has been referenced in the text of the Draft CCAP under Milestone 4: Implementation

Chief Executive's Recommendations

NO amendments necessary for Text or Actions.

Part 2: FCC & DLA Submissions with specific responses

Submissions Re New buildings to include renewable energy technologies / green roofs

Chief Executive's Response

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, exceed current building regulation standards, and requirement for new buildings to have an A 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

NO amendments necessary for Text or Actions.

Submissions Re Financing Building Energy Upgrades

Chief Executive's Response

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 scheme, 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 and noting that the Council has a direct remit in retrofitting and refurbishing its own social housing stock, 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:

INSERT NEW TEXT under ‘Public Awareness’ section:-

“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.”

Submissions Re Micro-generation in Dwellings and Non-domestic dwellings

Chief Executive’s Response

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) apply 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 the way of the planning development management process. as set out in the Planning & Development Act 2000 (as amended) and related regulations. Policies to support renewable energy projects are included in the Fingal Development Plan 2017-2023..

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 in November 2018.

Chief Executive’s Recommendation

NO amendments necessary for Text or Actions.

Submissions Re Embodied Carbon

Chief Executive’s Response

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

The Council currently adheres to national guidance on procurement as issued by the Office of Public Procurement. However, this guidance does not include embodied carbon as part of its assessment of infrastructural projects and there is no national guidance for Local Authorities in undertaking an embodied carbon assessment. The Draft CCAP for the Council aims to incorporate climate change into its procurement policies where feasible. Construction projects, in particular, also adhere to current Building Regulations which aim to ensure construction of low carbon energy efficient building.

The recent report from the Joint Committee on Climate Action *“Climate change: a cross-party consensus for action”* also referred to the need for including pricing of greenhouse gas emissions into public projects. The Committee was informed that the Department of Public Expenditure and Reform expects to issue a revised Spending Code shortly. This will require all public projects to price any future GHG emissions at the estimated costs that society will have to bear in reaching climate change targets. The Department is proposing a shadow cost of carbon that will reach €32 a tonne by 2020, €100 a tonne by 2030 and €265 a tonne by 2050.

Appendix E of the most recent update of the Public Spending Code (2015) sets out the current parameter values for the shadow price of public carbon. This is based on work carried out by an Interdepartmental Working Group chaired by the Department of Public Expenditure and Reform and reporting to the relevant Senior Officials Group. The Group recommended that Cost Benefit Analyses (CBAs) should monetise the value of emissions from the *“basket of seven”* Green House Gases which can be converted into carbon emissions. Market pricing should be used to monetise carbon emissions. In certain circumstances, CBAs should also monetise the value of emissions of other specified non-Green House Gas emissions.

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 2080:2016 - Carbon Management in Infrastructure.

The Council will await national guidance and direction on this issue.

Chief Executive’s Recommendation:

No amendments necessary for Text or Actions.

Submissions Re Energy Performance of Public/Private Buildings

Chief Executive’s Response

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 and Building Regulations.

Chief Executive's Recommendation

No amendments necessary for Text or Actions.

Actions on Transport

Part 1: FCC submissions with summary responses

Subgroupings

1. Staff Travel
2. Operations
3. Integration of spatial planning & transport
4. Active travel & behavioural change
5. Public transport
6. Actions awaiting budget
7. Misc

Staff Travel

Submission No	Comment Summary
28	Staff office swap to reduce commute
38	library relief panel where given a loan of the GoCar
64	FCC should produce a mobility management plan for staff

Chief Executive's Response

The Draft CCAP includes 3 relevant Actions:-

- T1 Install quality teleconferencing facilities between Blanchardstown and Swords.*
- T2 Modernise the workplace to facilitate flexible working arrangements to reduce staff travel (e.g. Skype).*
- T4 Promotion of Cycle-to-Work Scheme for Council staff.*
- T5 Provide an electric vehicle in County Hall courtyard and Blanchardstown for use by staff travelling to site visits and meetings.*

An electric vehicle has been made available for the general use of staff in Blanchardstown Offices and it is also intended to make one available in County Hall, Swords. Also, EV charging points have been provided at these locations.

The Council is open to considering ways to reduce unnecessary staff travel and to promote more sustainable forms of transport for staff.

Chief Executive's Recommendations

Consider issues above where relevant as part of the development and implementation of Actions T1, T2, T4 and T5.

NO amendments necessary for Text or Actions.

Operations

Submission No	Comment Summary
11	More public EV charging stations
19	All of the beaches need EV charge points
27	Ev charge points integrated street light
40	an increase in the electric vehicle charge point network
46	audit of existing cycleways periodically to check for any hazards that may be impeding the way of cyclists.
54	More EV charge points
79	More electric car points – Can we challenge the % of points in the new builds – e.g. 50% of car parking should have
79	Electric car points in existing apartment blocks – high density population – any incentive to improve number of electric car points
80	The consultation makes a virtue of the 12 public charging points in the county. At current population levels that is 20-30,000 residents per charging point. There would need to be many more points to provide adequate coverage. It would help if points were available in residential rather than urban areas, where there is less of a premium on public parking spaces.
81	A wider charging network should be made available , with free on street parking in these charging bays for electric/plugin hybrid cars. Commercial business delivering within the city or maintenance businesses, should be encouraged to adopt electric vehicles. A carrot and stick approach should be taken, the carrot being existing grants for electrical vehicles, plus the carbon tax credit scheme mentioned above, and then the stick being a congestion charge approach with the city divided into concentric zones, with owners of Diesel or Petrol vehicles being charged for all vehicle movements between these zones
85	<p>Electrify Fingal Co Council vehicles: replace all council owned vehicles at end of life with electric alternatives. All new vehicles bought to be electric.</p> <p>Provide free charging facilities for electric vehicles at all fingal county council owned or run buildings at a rate of one charge point for every ten parking spaces.</p>

	<p>Provide free charging points for electric vehicles in all town centre pay and display areas at the rate of one charge point for every ten car parking spaces.</p> <p>Provide free parking for car-sharing vehicles at the rate of one car parking space for every ten vehicles in town centre pay and display areas.</p> <p>Fit solar panels to south facing or flat roofs on all county council owned or managed properties and feed excess supply generated back into the grid.</p>
94	In Balbriggan there are currently only two public charge points for electric vehicles. Additional charge points should be added in key areas around Balbriggan like:
101	There needs to be more charging stations in place in Fingal and they need to be fast charge, to avoid people using them as parking spaces and blocking them up. It would be ideal if EV owners could get a text to their phone when their car is charged, much like the parking app. A fine should be applied to EV owners who are plugged into a public charging point when their car is fully charged. Also, a home charging unit costs about €1,200 (supplied and fitted) and the grant for this is only €600, which is not enough.

Chief Executive's Response

The Draft CCAP includes 5 relevant Actions:-

EB33 Install high visibility PVpanels on suitable Council roofs such as libraries and community buildings.

T7 Expand availability of EV charging points for Council staff and operational vehicles.

T8 Electric vehicle charge points to be provided in car parking for new Fingal Corporate buildings and social housing where technically feasible.

T11 Promote the installation of EC charge points in curtilage, for all new house constructions in Fingal.

T24 Expand the availability of EV charge points in towns and villages in line with national policy as it develops.

Submissions supported the use of electric vehicles and a quicker roll out of EV charging points. This is supported in the Actions of the Draft CCAP. EV charging points are being rolled out for staff. The Council is working with the other Dublin Local Authorities on a continuing roll out of charging points in the public realm. A significant roll out of public charging points will require Government policy and funding. The Planning Department will encourage the installation of EV charging points in new houses, where appropriate.

It is mentioned a number of times that the EV points should be free to use and it should be noted that the Commission for Energy Regulation has decided that a charge will be applied for their use.

There are already incentives for Electric Vehicles (VRT rebate) and no excise duty on electricity.

A submission suggested that solar panels should be put on Council buildings and this is already included in Draft CCAP as an Action.

Submissions raised the issue of improved public transport, traffic congestion and congestion charging. There are no current proposals for congestion charging. The issue of congestion and climate change are linked, but are not the same. Non fossil fuel cars do not address congestion. However, addressing congestion through increasing cycling and public transport does mitigate climate change impacts. The current Bus Connects and Metrolink projects aim to make public transport more effective and quicker. Their impact together with measures to improve cycling facilities and discourage car use will help mitigate climate change impacts. These proposals are being led by the National Transport Authority under the Greater Dublin Area Transport Strategy 2016-2035. An overview of the GDATS is provided in Appendix F.

Chief Executive's Recommendations

Consider issues above where relevant as part of the development and implementation of Actions EB33, T7, T8, T11 and T24.

NO amendments necessary for Text or Actions.

Integration of Spatial Planning & Transport

Submission No	Comment Summary
23	Continue developing greenways (royal canal, etc) & bicycle lanes & invest in public transport alternatives to cars
35	creation and promotion of green cycling and walking links between existing green blue corridors.
36	not rezoning any more land for building
70	development of isolated sections of Greenway across the County I propose that there needs to be a dramatic upskaling of effort & commitment
74	Develop greenways & cycleways
115	<p>Transport is the most significant Action Area. This is because it is by far the largest emissions sector in Fingal and it is the one going most rapidly in the wrong direction. The NTA estimate a 30% increase in GHG emissions from the Greater Dublin Area over the period of their Transport Strategy 2016-2035. It is clear that a radical change of direction is needed.</p> <p>In particular this requires a commitment to develop and fund the necessary facilities for walking cycling and public transport at a completely different rate. It would be based on an understanding that these modes must be the dominant transport modes in a sustainable Fingal and Greater Dublin Area. The Draft Actions in the Plan should be those which would be required in order to facilitate that sort of change. The Plan should the infrastructure and policy</p>

	<p>measures which would be required to make the emissions reductions required by the Covenant. Transport modelling would enable the necessary calculations to be made. However the Plan doesn't contain the necessary analysis, nor the measures which that analysis would identify.</p> <p>The extra actions needed to reduce transport emissions should be developed under the Transport Action Area heading through a process involving public participation.</p>
--	--

Chief Executive's Response

The Draft CCAP includes 5 relevant Actions:-

T10 To plan spatial development patterns which reduce transport demand and encourage low carbon transport modes. e.g. consolidation of the existing communities already served by public transport and close to established social and community infrastructure and the creation of new communities serviced by high quality transport links.

T12 Build out Fingal's cycle network offering direct routes to local destinations and public transportation hubs. Develop linked cycling trails, greenways and green belts for recreation and biodiversity protection

T13 Advance the provision of new cycle networks across the County such as the Fingal Coastal Way, the Sutton to Malahide Cycleway, the Broadmeadow Way, the Harry Reynolds Road Cycle Route and the Royal Canal Urban Greenway, etc.

T14 Advance the construction of the following road schemes which will include a high quality cycle network - Donabate Distributor Road, Rathbeale Road Upgrade and Snugborough Interchange and Ongar - Barnhill Link Road, etc.

T23 Support the development and expansion of existing public transport services including MetroLink, BusConnects and DART expansion to Balbriggan.

The issues raised include support for greenways, cycleways and public transport. These are strongly supported in the Actions in the Draft CCAP and also in the Fingal Development Plan 2017-2023, in particular Chapter 7 – Movement & Infrastructure.

The issue of zoning is for the Development Plan processes.

With reference to the Transport Strategy for the Greater Dublin Area (GDATS) 2016-2035 and the forecast increase in GHG emissions under that Strategy, and that the actions in the CCAP does not address this fact, and the Draft Plan should include infrastructure and policy measures to meet the commitment in the Covenant of Mayors to reduce these emissions (40% reduction overall).

The GDATS is a statutory plan and the Fingal Development Plan 2017-2023 is required to be consistent with the Strategy. Changes to the Strategy with regard to greenhouse gas emissions cannot be addressed through this CCAP and require a review of the Strategy itself. Technically the Council is not in a position to duplicate the modelling efforts of the NTA with regard to transport

emissions in the Fingal area and it would be of little benefit as the issue is a regional one with many journeys crossing county boundaries and the transport solutions are also required to cross county boundaries. See also response re Covenant of Mayors targets in Introduction Chapter.

Chief Executive's Recommendations

Consider issues above where relevant as part of the development and implementation of Actions T13, T14 and T23.

NO amendments necessary for Text or Actions.

Active Travel & Behavioural Change

Submission No	Comment Summary
11	Dedicated cycling infrastructure
19	Large bike rentals made available at every train station Malahide/Skerries
26	more bike racks along sections of cycle routes
34	Develop safe and segregated cycle paths on all major routes into the city.
40	massive investment in provision of cycle lanes physically separated from the road through shared pedestrian-cycle paths as found routinely in Germany,
40	an increase in free cycle parking to extend to all car parks on the model of the Drury Street Car Park
40	Promote the wearing of comfortable clothes for school and work so that air conditioning and heating is not so important; especially put a stop to girls having to submit to wearing cold skirts with knee socks or tights which inhibit them from cycling to school as their skirts get blown up or caught in the chain.
42	The plan for a Blanchardstown to Phoenix Park cycle lane should be revived and a cycle lane from Carpenterstown to the Phoenix Park should be considered.
47	Improved cycling infrastructure
54	More bike paths
55	Cycle to work scheme
55	Create more cycle lanes
55	Get schools to add trousers as an option for the uniform for girls – rather than skirts – girls will then cycle to school more, trousers = bikes more accessible.

57	cycle lanes within towns and not just between them
59	More money invested in high quality Cycle Lanes that are separated from Road Traffic. I would like to see the Cycle Lane at Dublin Airport on the R132 completed to include a possible cycle bridge across the Airport Roundabout.
64	Fingal should create a position for a cycling officer.
80	<p>While cycling is being encouraged by FCC (page 66) much of Fingal consists of unconnected towns more than 5-10kms apart, cycling is not a realistic transportation mode, given that the city centre is 12km away from the closest Fingal town. Cycling has been wrongly prioritized over pedestrian access which results in increased, unnecessary car usage where walking would be a better option. Pedestrian access should be prioritized over cycling access and pedestrians should be not put at risk by fast moving cyclists.</p> <p>The provision of "cycle lanes" far surpasses the availability of cycle parking spaces, never mind secured spaces where bikes are less at risk of theft or damage.</p>
81	<p>Councils should look to extend the Dublin Bike scheme to all areas, and they should look at ways to discourage Diesel or Petrols vehicles from coming into the city through a congestion charge type scheme, free street parking for electrical or hybrid cars, and more extensive electrical charging stations linked to sites that have extensive solar or wind generation capacity (see point above)</p> <p>Bike rental facilities should be set up in all railway stations and all shopping centre sites to encourage as many people as possible to use bikes for short local journeys</p>
83	<p>As students, who make the daily commute to school, we would like to have the infrastructure to cycle safely in our community. Unfortunately, we have limited cycle lanes and it can be dangerous to cycle on busy roads with hectic morning traffic. We would like to see a change in our local area. Cycling is so beneficial for not only our environment, but also for our physical and mental well-being. Overall, installing cycle tracks is a cheap, eco-friendly, innovative way to improve our community and help stop climate change one step at a time.</p>
84	<p>Lack of ambition with regard to cycling in draft strategy. Specific targets need to be included in the action plan. Otherwise, it remains an aspiration rather than a means for delivery of much needed safe, cycle ways.</p> <p>Similar % of cyclists commuting to work/study as in Dutch or Danish cities, which are global leaders in cycling infrastructure: 41% used bikes to cycle to work/study in Copenhagen in 2017.</p> <p>Coordinate traffic lights to favour cyclists. As in Copenhagen, develop cycle super highways to all major suburban towns which should be prioritised over all other transport methods.</p> <p>Increase number of secure bike parking facilities in city as cycling uptake</p>

	<p>expands - Have infrastructure ready.</p> <p>Expand JustEat Dublin Bike (DB) scheme to areas of FCC in proximity (10-15km) to city centre and make it free for users of these bikes as in Copenhagen.</p> <p>Pilot electric bikes (with GPS for tourists) as an option within DB scheme to encourage greater uptake.</p> <p>Make commitment to achieve UCI Bike City status by 2030 in collaboration with other DLA's</p>
94	<p>Pedestrianize Town Centres: Towns like Balbriggan are used as through towns, where traffic enters from one end and leaves via another. This would also increase footfall which would improve businesses, encouraging people to walk and engage in the community. In addition, monitoring and subsequent penalties should apply to drivers that leave stationary vehicles running for long periods of time.</p>
94	<p>Provision of safe cycling paths should be made. Currently Balbriggan town centre is void of any safe and coherent cycling paths. Inclusion of cycling paths in and around the town centre would change social norms, get people active and less reliant on using a car for short trips to the cinema, beach and local shops.</p>
101	<p>There is a serious need and demand for safe cycle lanes or cycle paths in the Fingal area. Malahide Community School has over 1200 pupils, yet less than 10% regularly cycle to school. This is mainly due to the fact that the road outside the school is narrow, busy and dangerous. Many pupils and teachers would like to cycle to school more often if the safe infrastructure was in place. A recent survey by the Green-Schools Committee showed that almost 30% of our pupils get a lift to/from school every day, yet over 80% of them live less than 5 kilometres away, which is a cyclable distance. Over 90% of our pupils have a bike or have access to a bike that they could use to cycle to school.</p>
106	<p>Balbriggan Tidy Towns welcomes the commitment to engage with community and environmental groups in the CCAP. The Tidy Towns initiative is mentioned specifically as a key stakeholder in the Resource Management target area. Balbriggan Tidy Towns urge Fingal Co. Co. to ensure that the Climate Action Team are adequately resourced to ensure effective implementation of the CCAP and meaningful engagement with all stakeholders.</p> <p>Balbriggan Tidy Towns support the development of the Harry Reynolds Road Cycle Route and request further upgrading of cycle routes within the town - including increased safe bicycle parking areas as well as installing more secure bicycle lockers at bus and train stops, Pedestrian-friendly planning to encourage students to walk safely to school & more publicly accessible EV charging points to encourage Balbriggan drivers to switch to EVs.</p>
107	<p>One of the issues with climate change is people driving motor vehicles too much - there are not sufficient cycle paths on main street in Swords, and that it would be much safer/more convenient if there were appropriate cycle lanes on</p>

	main street for people to get into school when both the paths and roads are busy, making nowhere safe to cycle.
108	<p>Point 1 Extension of Luas line from Broombridge to Blanch Centre to encourage more use of public transport.</p> <p>Point 2 Ensure cycle lane runs from City Centre to Blanchardstown without having to go onto the main road at any point. I live in cabra and work in Blanchardstown and would be happy to cycle to work if there were adequate cycle lanes.</p> <p>Point 3 The other idea would be to have bike depots at all train stations so people could use public transport and then cycle the rest of their journeys,</p>
115	In relation to cycling, the Plan should start by committing to implementing the Greater Dublin Area Cycle Network Plan within Fingal.
119	<p>Alternative modes of transport should be prioritised to ameliorate the traffic and mitigate its associated negative impacts. Fingal can be challenging to traverse on a bike. The D15 area has a very limited amount of cycle lanes. The more dedicated pedestrian focussed areas and segregated bicycle lanes that are provided to the people of Fingal, the more that will be encouraged to utilise the space.</p> <p>Business' footfall increases when there is investment in pedestrian infrastructure in a city. An increase in public plazas and street furniture would provide people with option of a free, public space where they can relax and enjoy just being amid a county that is prioritising the people that live, work and play in the city, not the cars that transport them there. Investing in better streets and spaces for walking can provide a competitive return compared to other transport projects; walking and cycling projects can increase retail sales by 30% or more.</p> <p>There is no mention of Fingal's bike sharing scheme, "BleeperBike" in the Plan. The Dublin Bikes scheme has clearly shown the appetite Dubliners have for these initiatives. Bleeper Bikes would be far easier to expand upon as it does not depend on expensive infrastructure, merely that there are bike parking facilities. Investing in bike parking infrastructure could allow for the expansion of "Bleeper Bikes" in addition to making it easier for Fingal residents to use their bike around Fingal.</p> <p>A city that prioritises its most vulnerable road users in its transportation network will experience the benefits of increasing footfall in businesses, increasing the quality of air of Fingal's major population centres, making our society healthier as we're encouraging people to move around Fingal on their own power and in turn reducing their carbon footprint.</p>
120	<p>FCC urgently needs to address the issue of sustainable transport as Dublin's roads are some of the most congested in Europe.</p> <p>The roads are not safe for cyclists and the city and surrounding areas need more segregated bike lanes. Even measures such as placing bollards or bumps to separate cyclists from road users would be helpful. FCC should also consider introducing two-way road systems for cyclists. In many places road widening</p>

	<p>may need to be considered e.g. the road between Sutton and Portmarnock.</p> <p>Making north Dublin more pedestrian-friendly - especially for those with reduced mobility. Creating more zebra crossings is vital, especially at junctions. There are plenty of cities across Europe and beyond which we can look to for models of pedestrian-friendly city design.</p> <p>Examine the synchronisation of traffic lights, especially at pedestrian crossings as they are inconsistent and in most instances do not allow enough time for pedestrians to cross. The result is that the majority of pedestrians often cross roads in a dangerous fashion.</p> <p>FCC must do all in its power to reduce our car dependency and not simply look at reducing emissions. FCC needs needs to foster other more novel forms of sustainable transport such as escooters as all forms of alternative transport modes can play a role in reducing our car dependency.</p> <p>Finally, FCC should examine ways of working with schools to reduce the number of students who travel to school by car.</p>
--	---

Chief Executive's Response

The Draft CCAP includes 12 relevant Actions:-

T10 To plan spatial development patterns which reduce transport demand and encourage low carbon transport modes. e.g. consolidation of the existing communities already served by public transport and close to established social and community infrastructure and the creation of new communities serviced by high quality transport links.

T11 Promote the installation of EV charge points in curtilage, for all new house constructions in Fingal.

T12 Build out Fingal's cycle network offering direct routes to local destinations and public transportation hubs. Develop linked cycling trails, greenways and green belts for recreation and biodiversity protection.

T13 Advance the provision of new cycle networks across the County such as the Fingal Coastal Way, the Sutton to Malahide Cycleway, the Broadmeadow Way, the Harry Reynolds Road Cycle Route and the Royal Canal Urban Greenway, etc.

T17 Improve conditions and uptake of cycling through public realm / local area plans.

T18 Re-organisation of allocation of space to pedestrians in the public realm.

T19 Increase the quantity of bicycle stands in the public domain.

T20 Expand Bike Sharing Schemes in urban areas 2019-2020.

T21 Promote and facilitate additional car sharing schemes.

T23 Support the development and expansion of existing public transport services including MetroLink, BusConnects and DART expansion to Balbriggan.

T24 Expand the availability of EV charge points in towns and villages in line with national policy as it develops.

T25 Identify and put in place the resources necessary to develop and implement a cycling strategy.

Many submissions supported and urged the expansion of the cycle network in Fingal, the provision of bike storage/parking and the expansion of bike rental schemes. The submissions were concerned with both long distance commuting between towns and shorter journeys within towns especially cycling to school and train stations. The improvement of cycling facilities was often linked with improved pedestrian facilities. Also, concerns expressed about the quality and design of cycling facilities.

The development and improvement of cycling facilities, including the promotion of cycling, is strongly supported in the Actions of the Draft CCAP as referenced above, and also in the Fingal Development Plan 2017-2023 – Chapter 7 Movement & Infrastructure.

It is worth noting that the Bus Connects proposal, which is currently in a process of public consultation, includes the improvement of many cycle routes and bus facilities on the main routes into the city centre.

Some submissions were concerned with specific schemes or locations. The Draft CCAP does not consider particular additional cycle routes other than those already underway and mentioned as examples in the Draft Plan. Consideration of such particular proposed routes will have to go through the normal evaluation and budgetary processes. All submissions in this regard will be forwarded to the relevant Council Department for consideration.

The provision of cycle stands in the public realm is an Action in the Draft CCAP. The provision of advanced bicycle storage at train stations is desirable and Irish Rail will be consulted on this point.

The expansion of a bike sharing schemes in urban areas is included in the Draft CCAP.

Two submissions were concerned with dress codes at school and work inhibiting cycling. The issue of dress codes in schools and workplaces may be an inhibition to cycling in some cases. However, it is not feasible for the Council to intervene in dress codes in individual schools and workplaces. General advice is unlikely to be effective.

One submission called for a cycling officer in Fingal. The resources necessary to implement a cycling strategy for Fingal are currently being considered and this has been included as an Action in the Draft CCAP.

One submission made reference to the Greater Dublin Cycle Network Plan (GDCNP) and asked that the Draft CCAP should commit to specifically implementing the GDCNP in Fingal. While the GDCNP is already supported by Objective MT14 in Chapter 7 – Movement and Infrastructure, of the Fingal Development Plan 2017-2023, it is agreed that it should be referenced in the Draft CCAP.

Chief Executive's Recommendations

Refer any specific proposal re new or improved cycling facilities to the appropriate Department.

Consult with Irish Rail re provision of advanced bicycle storage at stations.

Consider submissions above where relevant as part of the development and implementation of Actions T10, T11, T12, T13, T17-T21, T23-T25 and new Action T14 re the Greater Dublin Cycling Network Plan as proposed next.

INSERT NEW ACTION T14 after T13 under Active Travel & Behavioural Change Section in Resource Management Action Area, as follows:

T14 *Support the Greater Dublin Cycling Network Plan*

RENUMBER the remaining Actions appropriately (incl. Actions referred to above).

Public Transport

Submission No	Comment Summary
57	ensure provision of public transport
73	Provide public transport for new estates
87	<p>By putting in new bus routes into our Fingal area, we would help to push people more into using their car less and therefore saving fuel and reducing the amount of co2 or methane in our atmosphere. Places such as Ballyboughal have no means of public transport and don't have a way of reaching primary locations in Dublin such as Swords, Dublin City Centre, etc. We hope by a change in this and in other known areas with no bus routes, that we give people no excuse as to using their car and wasting petrol going into our atmosphere.</p> <p>We also believe by providing a walkway from Knocksedan in Swords, to the main bus route at the top of Abbeyvale, that more people living in Knocksedan will take the bus more often and will not be left to be walking through muddy and wooded areas to get to Abbeyvale.</p>
117	Access to transport by cycling/walking has to be encouraged by prioritizing the provision of well illuminated, safe paths and cycle lanes that are segregated from traffic, not only in the urban centres but also between towns.

Chief Executive's Response

The Draft CCAP includes 6 relevant Actions:-

T10 To plan spatial development patterns which reduce transport demand and encourage low carbon transport modes. E.g. consolidation of the existing communities already served by public transport and close to established social and community infrastructure and the creation of new communities serviced by high quality transport links.

T12 Build out Fingal's cycle network offering direct routes to local destinations and public transportation hubs. Develop linked cycling trails, greenways and green belts for recreation and biodiversity protection

T13 Advance the provision of new cycle networks across the County such as the Fingal Coastal Way, the Sutton to Malahide Cycleway, the Broadmeadow Way, the Harry Reynolds Road Cycle Route and the Royal Canal Urban Greenway, etc.

T14 Advance the construction of the following road schemes which will include a high quality cycle network - Donabate Distributor Road, Rathbeale Road Upgrade and Snugborough Interchange and Ongar - Barnhill Link Road, etc.

T22 Develop a policy with NTA for the provision of Park & Ride facilities across the County 2019 Operations, Planning & Strategic Infrastructure Policy developed and sites identified

T23 Support the development and expansion of existing public transport services including MetroLink, BusConnects and DART expansion to Balbriggan.

The Council does not have the statutory responsibility for the direct provision of public transport services. This is a function primarily of the National Transport Authority supported by the various transport providers. However, the Council has a key role in promoting and facilitating public transport through the Development Plan & development management processes, the improvement and construction of bus and cycling infrastructure and the general promotion of public transport and cycling as a sustainable mode of travel.

This approach is strongly supported in the existing Actions of the Draft CCAP and also in the Fingal Development Plan 2017-2023, Chapter 7 – Movement & Infrastructure.

Chief Executive's Recommendations

Consider issues above where relevant as part of the development and implementation of Actions T10, T12, T13, T14, T22 and T23.

NO amendments necessary for Text or Actions.

Miscellaneous

Submission No	Comment Summary
33	We need to see to what extent FCC can have an influence on the quality of bus provision within the county. We do not accept that FCC has little influence on reliability, speed and comfort of bus services within the county.
33	It is disappointing to see that, while there are 10 action points for active travel, there are only two for public transport; and these only refer to Park & Ride, and to major expansion projects. There are no action points at all for day-to-day influence on how buses can operate reliably with timings that are competitive with private car.

63	Introduce a new action to support the creation of Smart Mobility Hubs for Business or University Districts and Private Organizations to promote adoption of Carpooling and Vehicle Sharing based on a variety of greener EV vehicle types (not just cars but also vans, minibuses, bikes and scooters).
63	As part of action no. 21 promote innovative car & vehicle sharing initiatives that go beyond traditional car clubs. These could be open peer-to-peer vehicle sharing marketplaces where mobility providers, organizations and private individuals can list their vehicles (cars, vans, bikes, scooters...) and share them with their local community.
63	Introduce a new action that promotes Mobility-as-a-Service initiatives. This would facilitate seamless travel plans across multi-modal transport options with integrated subscription plan or payment card. These transport options would include car and bike sharing, carpooling and other innovative shared mobility options in addition to public transport.
63	Introduce incentives for the use of innovative carpooling and shared vehicles initiatives (beyond existing car clubs).
67	Conversion of the Council's vehicle fleet to CNG as refuelling infrastructure becomes available."
73	I think Fingal needs to develop more sophisticated techniques for analysing if new planning applications are actually going to reduce transport demand
117	The continued approach to housing development of building sprawling estates, promotes the use of cars - necessary to access shops and schools - and completely undermines policies designed to encourage adults and children to walk and cycle.

Chief Executive's Response

The Draft CCAP includes 4 relevant Actions:-

T6 Continued electrification of the Council's vehicle fleet as market technology develops

T10 To plan spatial development patterns which reduce transport demand and encourage low carbon transport modes. E.g. consolidation of the existing communities already served by public transport and close to established social and community infrastructure and the creation of new communities serviced by high quality transport links

T20 Expand Bike Sharing Schemes in urban area.

T21 Promote and facilitate additional car sharing schemes.

The Council does not have the statutory responsibility for the direct provision of public transport services. This is a function primarily of the National Transport Authority supported by the various transport providers. However, the Council has a key role in promoting and facilitating public

transport through the Development Plan & development management processes, the improvement and construction of bus and cycling infrastructure and the general promotion of public transport and cycling as a sustainable mode of travel. This approach is strongly supported in the existing Actions of the Draft CCAP and also in the Fingal Development Plan 2017-2023, Chapter 7 – Movement & Infrastructure.

The Council has already changed some of its fleet to EV and this change to more sustainable technology this will continue as newer technology develops.

The Council is very open to considering smart mobility, vehicle and bicycle sharing initiatives etc. and has already facilitated a number of them. This support will continue.

With reference to analysing the impact of individual planning applications on traffic demand, the Council does implement Government policy on promoting modal shift to more sustainable forms of transport through the Fingal Development Plan 2017-2023, in particular Chapter 7 – Movement & Infrastructure and Chapter 12 – Development Management Standards.

Chief Executive's Recommendations

Consider issues above where relevant as part of the development and implementation of Actions T6, T10, T20 and T21.

NO amendments necessary for Text or Actions.

Part 2: FCC & DLA Submissions with specific responses

Submissions Re Carbon Offsetting

Chief Executive's Response

Submissions related to introducing carbon offsetting initiatives in local authorities were received. It is considered that Action T3 should be expanded.

Chief Executive's Recommendation:

AMEND Action T3 in Staff Travel under Transport Action Area by adding the following text to the current Action which reads *"Implement carbon offset programme for official flights"*:-

"investigate an appropriate offsetting scheme for the Council's other business travel emissions."

Submissions Re Modal Shift

Chief Executive's Response

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.

The Fingal Development Plan 2017-2023 is the primary Council plan in relation to this issue and does, in accordance with national policy, place 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.

Sustainable forms of transport such as public transport, walking, and cycling are strongly promoted in the Fingal Development Plan 2017-2023, which takes a pro-active approach to influencing travel behaviour and effective traffic management. These are seen as important elements of a progressive policy that can contribute to climate change mitigation and a more sustainable county. A crucial factor in the discussion of movement and transport is the challenge of tackling climate change. The proper planning of transport related spaces should reduce transport-related emissions

It is considered that modal shift measures are adequately addressed in the primary plan in relation to these issues, the Fingal Development Plan 2017-2023 (which incorporates national policy) and the CCAP.

Chief Executive's Recommendation

NO amendments necessary for Text or Actions.

Submissions Re Park and Ride facilities

Chief Executive's Response

A number of submissions requested additional and improved Park and Ride facilities. The Council is working with the NTA in the identification of suitable sites and one site is being actively worked on at present.

Chief Executive's Recommendation

NO amendments necessary for Text or Actions.

Submissions Re Electric Vehicle Charge Points

Chief Executive's Response

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*" also makes a number of recommendations in relation to electric vehicle infrastructure. It is understood that measures related to the increased uptake of electric vehicles including charging infrastructure will be included in the all-of-Government climate action plan to be completed in 2019. 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.

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. The Council intends to roll out our further charging points in the public realm pending national policy and measures being available.

Chief Executive's Recommendations

NO amendments necessary for Text or Actions.

Submissions Re Bike to work scheme

Chief Executive's Response

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. The Council has no role in increasing the allowance for the bike to work scheme as it 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 also provides bicycle facilities for staff to use at its main offices.

The Council also licence bicycle sharing schemes for public use.

Chief Executive's Recommendations

NO amendments necessary for Text or Actions.

Submissions Re Dublin Airport/Aviation transport emissions

Chief Executive's Response

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

The Council acknowledges the role of the aviation sector in national greenhouse emissions. The Council has no role in the regulation or operation of airport flight activities in the context of climate change.

The role of Dublin Airport in addressing climate change is within the remit of the Dublin Airport Authority, the Irish Aviation Authority and the Department of Transport, Tourism and Sport (DTTAS).

(Note: The Council is being designated the "competent authority" for the regulation of aircraft noise at Dublin Airport for the purposes of EU Regulation 598/2014. This does not include any direct responsibility for climate change mitigation.)

The Government policy on Aviation activities is articulated in the 2015 policy document "A National Aviation Policy For Ireland"¹ prepared by DTTAS. Emissions from the aviation sector were brought under the scope of the EU Emission Trading Scheme (ETS) in 2008. An overview of ETS is provided in appendix E.

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 and the 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 Recommendations

NO amendments necessary for Text or Actions.

Submissions Re Bus Technology – Electrification

Chief Executive's Response

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

The Council has no role in the choice of technology for the public transport used in the Council area. This role is mandated to the NTA and funding is provided for public bus fleets from central government through DTTAS. The Government's "*Project Ireland 2040*" commits to ending the purchase of diesel-only buses from July 2019 for all 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 NTA, 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. 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.

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 Recommendations

NO amendments necessary for Text or Actions.

Submissions Re Air Pollution from older bus fleet

Chief Executive's Response

A number of submissions outlined that the bus fleet contribute to air pollution within the county and region. It is acknowledged that fossil fuelled vehicles, public and private, are sources of air pollutants and greenhouse gases. The Council has no role in the choice of technology for the public transport used in the Council area. This role is mandated to the NTA and funding provided for public bus fleets from central government through DTTAS. The Government's "Project Ireland 2040" 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 NTA, 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 UK.

It is noted that the NTA licences the operation of hundreds of public bus passenger services across the country. In the Dublin area there are many older buses which have been bought by private operators from Bus Éireann and Dublin Bus at their end of public vehicle life and now being used as private commuter express buses and as transfer vehicles for businesses, hotels and school for example. In some cases, these vehicles are nearly 20 years old or registered in the early 2000s. The air pollutant emissions and greenhouse gas emissions from these vehicles are many times those of the modern EURO 6 equivalent and even more again if compared to a diesel hybrid, gas or full electric bus.

There is an opportunity for the NTA as a licensing authority, to play a positive role in terms of reducing the emissions from older vehicles being used on existing and proposed bus routes.

Chief Executive's Recommendations

NO amendments necessary for Text or Actions.

Submissions Re Electric Vehicle Grants

Chief Executive's Response

A number of submissions were made requesting increased and continued electric vehicle grants. The Council has no role in the provision of electric vehicle grants. A range of grants for private and commercial vehicles are available from the Sustainable Energy Authority of Ireland (SEAI) through funding from the Department of Communication Climate Action and Environment (DCCAE). 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.

Chief Executive's Recommendations

No amendments necessary for Text or Actions.

Actions on Flood Resilience

Part 1: FCC submissions with summary responses

Subgroupings

1. Flood risk management
2. Flood defence

Flood Risk Management

Submission No	Comment Summary
5	FCC should promote their SUD's policy in a more effective way
21	Look to improve drainage in new estates by using permeable options to tarmac to avoid flash flooding at extreme weather.
33	Learning from the experience of 'letting nature take its course' as at Rogerstown Estuary - extend this where feasible to other water courses.
74	SuDS advice
81	<p>Summary</p> <p>Given the likelihood of extreme weather events, both severe storms, and droughts. Councils should have in the action plan goals of capture as much water and converse as much water as possible</p> <p>Rain Water Capture</p> <p>Council manage a significant amount of parkland, a study should be undertaken to evaluate to what extent councils can implement water capturing facilities within those parks to</p> <ol style="list-style-type: none">a. Provide water supply to meet the needs of those parksb, Avoid flooding during extreme storesc,. Avoid water loss 'down system' due to leaks in underground drains bringing the water to treatment plants.
86	I think it would be advisable to look into the impact of rising sea levels on the homes situated near coastal areas of Fingal.
106	Flood Resilience: As a coastal town, Balbriggan Tidy Towns support the development of a climate change impact GIS risk map. All current and future projects planned for Balbriggan should consider the potential future impact of coastal erosion.

Chief Executive's Response

The Draft CCAP includes 8 relevant Actions:-

FR3 Finalise a SuDS policy in collaboration with all Fingal departments

FR21 Identify and put in place the resources to develop and promote SuDS, including: Promote and encourage community involvement in the retrofit of SuDS in existing developments, maintaining community rain gardens, discourage hard paving in gardens and retrofit raingardens / water butt installations

FR5 Protect and conserve floodplains, wetlands and coastal areas subject to flooding through available policy instruments.

FR9 To engage with the Fingal Coastal Liaison Group with the integration of adaptation strategies into planning policies, etc.

FR10 Develop a climate change impact GIS risk map with scenarios for the Dublin Region.

FR15 Continued engagement with the OPW to progress further studies of areas within Fingal at risk of flooding, and development of suitable schemes such as Strand Road Sutton and Santry.

FR16 Develop a coastal monitoring programme to measure coastal erosion along the Fingal coast.

FR17 Identify sites where flood defence features can be removed or relocated to increase flood capacity of rivers and estuaries.

It is a requirement of the Fingal County Development Plan 2017-2023 that all new development must incorporate sustainable drainage measures including a reduction in hard standing and incorporation of more permeable surfaces in order to reduce and attenuate surface water runoff and improve water quality.

The suggestion in relation to studying the water capturing capabilities within Parks as flood alleviation measures and for improved sustainability has merit and is being considered in the design of new parks and open spaces. This suggestion will be referred to Planning & Strategic Infrastructure and Operations Departments for consideration and any resulting action will be considered for the Plan at the 1st review.

The Council works closely with the OPW in relation to coastal flooding and areas at risk have been identified in the Fingal Development Plan 2017-2023. There is also ongoing engagement with the OPW in relation to carrying out studies of areas at risk and possible solutions.

Chief Executive's Recommendations

Consider issues above where relevant as part of the development and implementation of Actions FR3, FR5, FR9, FR10, FR15, FR16, FR17 and FR21.

Refer suggestion in relation to studying the water capturing capabilities within Parks as flood alleviation measures and for improved sustainability to Planning & Strategic Infrastructure and Operations Departments for consideration and any resulting action to be considered for Plan at the 1st review.

NO amendments necessary for Text or Actions.

Flood Defence

Submission No	Comment Summary
6	Junction of Hayestown Rd and Brook Rd Rush, flooded by a narrow region of the stream
7	Junction of Spout Rd and Whitestown Rd, Rush – bridge can overflow and lands adjacent to the road
8	Rush sand bank should be protected. Coastal defence banks are gone and should be replaced
11	Continued efforts to combat coastal erosion.
33	Restore regular annual clearing and cleaning of roadside drainage systems in towns and villages and provide run-offs along country roads.
86	I have seen flood maps that indicate that much of the Baldoyle area would be under water if sea levels rose 1 meter. Are there currently plans underway to address this issue by constructing an artificial or natural barrier?

Chief Executive's Response

The Draft CCAP includes 3 relevant Actions:-

FR11 Develop and implement Coastal Protection Plan for Portrane.

FR15 Continued engagement with the OPW to progress further studies of areas within Fingal at risk of flooding, and development of suitable schemes such as Strand Road Sutton and Santry.

FR20 Prepare a maintenance register for the entire surface water system within the county, including SuDS, pipes and culverts to aid proactive maintenance, alleviate flooding and maintain water quality.

The potential flood risk to Baldoyle as a result of a 1m rise in sea level is a “*high end*” future risk. The OPW have identified Baldoyle as an area requiring further assessment. The Council will engage with the OPW in assessing the flood risks in this area.

The Council is actively working to address coastal erosion along it's coastline. The Council coastal protection team has engaged RPS Consulting Engineers to undertake a detailed coastal erosion risk management investigation and to develop an appropriate plan to best manage the risks at Portrane and Rush sand bank.

The Operations Department are aware of occasional localised surface water flooding at Junction of Hayestown Rd and Brook Rd Rush and Junction of Spout Rd and Whitestown Rd, Rush. Preventative maintenance of the associated surface water network has been undertaken.

Chief Executive's Recommendations

Consider issues above where relevant as part of the development and implementation of Actions FR15, FR11, FR15 and FR20.

NO amendments necessary for Text or Actions.

Chief Executive's Proposed Amendment to Update Draft Plan

Planning & Strategic Infrastructure Dept have provided these additional Actions:

Chief Executive's Recommendations

INSERT NEW ACTIONS FR11 & FR12 at end of Flood Risk Management Section in Flood Resilience Action Area:-

FR11 Archaeological and heritage assets to form part of all climate risk assessments including opportunities for integration of cultural heritage in adaptative mitigations e.g. green infrastructure, cycle ways, nature-based solutions etc.

FR12 Identify projects and opportunities for collaboration with relevant stakeholders to assess and prioritise cultural heritage sites vulnerable to climate change

RENUMBER the remaining Actions appropriately.

INSERT NEW ACTIONS FR24 & 25 end of Actions Awaiting Budget Section in Flood Resilience Action Area:-

FR24 Carry out a Climate Change Risk Assessment of Fingal's Cultural Heritage to identify and survey the architectural and archaeological heritage sites and designed landscapes.

FR25 Develop maintenance and condition survey programmes for Council owned historic buildings and ancient monuments that are informed by climate change impacts.

INSERT NEW ACTION EB34 at end of Actions Awaiting Budget Section in Energy & Buildings Action Area:-

EB34 Conduct research and case studies on appropriate and sensitive retro-fitting/energy upgrading of traditional buildings to inform works to Council owned properties and to guide private owners.

Part 2: FCC & DLA Submissions with specific responses

Submissions Re Irish Water as a stakeholder

Chief Executive's Response

A submission notes that Irish Water is absent from the list of stakeholders in the Draft Plan. Given that Irish Water are a stakeholder in the work of the Council, new text is proposed.

Chief Executive's Recommendations

INSERT NEW TEXT in the Flood Risk Management section of the Flood Resilience Action Area:-

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

Actions on Nature Based Solutions:

Part 1: FCC submissions with summary responses

Subgroupings

1. Operations
2. Green infrastructure
3. Agriculture
4. Tree management
5. Conservation & preservation
6. Actions awaiting budget
7. Miscellaneous

Green Infrastructure

120	In brief - more planting of trees, community gardens and even rooftop green spaces. More greenery is also proven to improve mental well-being and overall health.
-----	---

Chief Executive's Response

The Draft CCAP includes 4 relevant Actions:-

NBS3 Develop Green Infrastructure Strategy that incorporates climate change mitigation and adaptation to increase climate resilience.

NBS7 Review and implement the Tree Strategy to protect existing trees, increase tree cover, establish guidelines on tree maintenance and investigate feasibility of urban orchards.

NBS8 Identify sites for woodland planting.

NBS16 Support the use of allotments as a way communities can grow their own food, and lower food miles and waste.

The importance of the issues identified in the submissions is agreed and is already reflected in the existing Actions of the Draft CCAP.

Supporting Green Infrastructure and biodiversity are significant policy objectives of the Fingal Development Plan 2017-2023, specifically as set out in Chapter 8 – Green Infrastructure and Chapter 9 – Natural Heritage.

Chief Executive's Recommendations

Consider submission above where relevant as part of the development and implementation of Actions NBS3, NBS7, NBS8, and NBS16.

NO amendments necessary for Text or Actions.

Conservation & Preservation

Submission No	Comment Summary
21	Create fruit orchards or small community allotments
23	Continue to Encourage residents to rewild their gardens and make them animal, bird & insect friendly.
23	Encourage all farmers to turn to alternative plant based, pref organic & tillage farming.
30	Parks should follow the Pollinators plan to encourage biodiversity in all parks
31	Create Zero Landscape Waste Parks and Public Spaces
42	The Council should prioritise the planting of wildflowers and other plants which promote pollination and encourage opportunities for bee keeping and other initiatives which conserve vulnerable insect species
46	involves some free wildflower seeds for school children in some of the schools locally, or similar bee friendly flowers/seeds.
46	support local tidy town initiatives,
46	More climate change informatio at Fingal Parks - info signs re natural wildlife/plants/pollinators etc.
54	· Control invasive species
54	· Don't use pesticides
54	· Put more bug hotels
54	· Plant more flowers & Trees
55	· Bug hotel – find bricks, wood and plastic around and make a bug hotel
55	· Plant flower patches around the area for bees
56	More Supports for Tidy towns
62	Conserve and restore habitats within Fingal County Council boundaries
70	Establishing an exemplar town
74	Funding & training for tidy towns

74	Bigger campaigns around pollinators
85	Ban the use of pesticides and introduce wild flower planting where appropriate.
91	<p>Balbriggan has a number of Greenfield areas that are regularly cut by Fingal County Council. Certain portions of these Greenfield sites should be left grow wild and further enhanced to include wildflower areas for pollinators to thrive. This should be done with a view to retaining playing areas for children and walking paths for locals. Some suggested sites to consider for Pollination areas and Meadow lands within Balbriggan are:</p> <ul style="list-style-type: none"> - Hampton Cove Green - Fields South of Balbriggan to Lady's Stairs (These should be left lie fallow) - Derham Park - Mill Pond Park - Pinewood Green - Castlelands Green - Moylaragh Green - Green around Martello Tower
97	Our school community should help pollination around our local area to help bees and other pollinators.
100	Every year more pollinators like honeybees, bumblebees and butterflies are dying because of sudden temperature changes caused by climate change, pesticides and invasive species. We must do something to save our pollinators.
102	Finally there needs to be a huge push on education of all residents of fingal to promote more pollinators in our community. Wild flower parks, banning toxic weed killers, PR campaigns on need for biodiversity in our own gardens etc would be fantastic
106	Nature Based Solutions: Balbriggan Tidy Towns encourages pollinator-friendly planting in the town and wildflower meadows within the larger grassy open spaces. The plan for the landscaping of Bremore Castle Park should be rich in bio-diversity. Dandelions are a particularly important source of food for pollinators and people with gardens should be encouraged to leave areas of lawn uncut during spring and summer months. We would support more tree planting particularly in streetscapes to improve air quality. Balbriggan main street for example, as a hard landscaped area, would benefit from such an initiative.
111	<p>"BIODIVERSITY</p> <p>Preservation of existing woodlands, particularly along Royal Canal Way and Tolka River</p> <p>Enforcement of Bird Nesting Season</p> <p>Undertake county-wide ecological study of woodlands, riparian habitats, hedgerows, grasslands, etc</p>

111	Promote awareness through education e.g. Bee-hotels/insect farms at schools
111	Seek additional lands for suitable allotments, promote Grow-it-Yourself
118	<p>More than half of Ireland's bee species have undergone substantial declines in their numbers since 1980. The distribution of 42 species has declined by more than 50%. 30% of the Irish species are threatened with extinction. Six species are critically endangered, 10 are endangered and 14 species are vulnerable. Two species have become extinct in Ireland within the last 80 years.</p> <p>Without pollinators our food supply is in jeopardy. We need to introduce ways of facilitating pollinators, like Bees, increasing their numbers and protecting them from extinction.</p> <p>Studies in the U.S. have shown that Urban beehives have a longer life span than rural beehives. In fact the overwintering survival rate of bees in Urban areas is 62.5% on average as opposed to 40% in rural areas. Also Urban Beehives produce 1.6 times more honey than rural beehives.</p> <p>There is a strong case to be made to promote Urban beekeeping. Fingal County Council should support the development of Community Beehives in towns and cities around the county and make provision for dedicated Community Beekeepers to manage these Beehives or assist community groups to undertake the management of Beehives in their area.</p> <p>Fingal County Council should take the lead in promoting and developing community Beehives and Beekeeping in all areas as a model for what could be done nationally.</p>

Chief Executive's Response

The Draft CCAP includes 7 relevant Actions:-

NBS1 Engage with sectoral adaptation plan on biodiversity to identify key habitats and species at risk from climate change impacts.

NBS2 Engage with regional working group on nature-based solutions once set up.

NBS3 Develop Green Infrastructure Strategy that incorporates climate change mitigation and adaptation to increase climate resilience.

NBS13 Develop and promote National Biodiversity Data Centre All Ireland Pollinator Plan Action for Councils.

NBS15 Increase pollinator areas in public parks and open spaces.

NBS16 Support the use of allotments as a way communities can grow their own food, and low food miles and waste.

RM11 Support and promote the inclusion of climate change initiatives in tidy town, green schools and cleaner communities.

Many of the issues raised above are already supported by the Council and reflected in the Actions in the Draft CCAP. Fingal employs a full time Biodiversity Officer, is a Partner of the All-Ireland Pollinator Plan and has been to the forefront in implementing pollinator actions such as the Growing Places initiative. The Council has developed 4 allotments in the County and is supportive of community gardens. The issue of developing an exemplar town will be considered as part of the implementation of the Plan.

Supporting Green Infrastructure and biodiversity are significant policy objectives of the Fingal Development Plan 2017-2023, specifically as set out in Chapter 8 – Green Infrastructure and Chapter 9 – Natural Heritage.

The importance of the issues identified in the submissions is agreed and is already reflected in the existing Actions of the Draft CCAP.

Chief Executive's Recommendations

Consider submissions above where relevant as part of the development and implementation of Actions NBS1, NBS2, NBS3, NBS13, NBS15, NBS16 and RM11.

NO amendments necessary for Text or Actions.

Tree Management

Submission No	Comment Summary
4	Public Hedgerow training
15	Tree giveaway
33	Expand and accelerate the use of natural solutions as identified for flood mitigation. Particularly urban tree planting which has the added benefit of improving air quality.
41	designate public lands suitable for tree planting with the aim of facilitating the planting of one tree per child of school going age
55	A grant available for people to be able to plant trees around their house
55	Plant more trees to absorb carbon dioxide and more habitats for animals
62	Sequester and store carbon through hedgerows, scrub and woodlands and support biodiversity co-benefits
85	Examine grass verges and consider woodland planting options. Include the provision of fruit and nut trees and bushes in urban and built up areas.
90	Community events should be held to promote tree planting and protection. Given standard Gardens have limited space for tree planting, initiatives should be started to involve the community in tree planting in public spaces. This could be done for example along the Bracken River in Balbriggan's Mill Pond

	Park where suitable trees would hugely enhance the area. Also along existing roads, such as the verge on the Castelands access Road, suitable tree planting would greatly enhance the area from an eco as well as aesthetic perspective.
105	Doubling the level of afforestation on public lands in Fingal is a very affirmative medium term goal..
105	Other tree planting initiatives focusing on school based projects are vibrant and in tune with the green flag curriculum.
105	Placing a substantial number of new plantings into our green belts and woodlands also brings a commitment to mental health and wellness generally.

Chief Executive's Response

There Draft CCAP includes 6 relevant Actions:-

NBS3 Develop Green Infrastructure Strategy that incorporates climate change mitigation and adaptation to increase climate resilience.

NBS7 Review and implement the Tree Strategy to protect existing trees, increase tree cover, establish guidelines on tree maintenance and investigate feasibility of urban orchards.

NBS8 Identify sites for woodland planting.

NBS10 Incorporate SuDs inot Constructed Tree Pits provided by the Council and in requirements for Constructed Tree Pits conditioned by the Council in planning permissions.

RM11 Support and promote the inclusion of climate change initiatives in tidy town, green schools and cleaner communities.

RM21 Develop and implement a Climate Change Awareness Grant Programme for schools and communities.

The importance of the issues identified in the submissions is agreed and are already reflected in the existing Actions of the Draft CCAP.

Supporting Green Infrastructure and biodiversity are significant policy objectives of the Fingal Development Plan 2017-2023, specifically as set out in Chapter 8 – Green Infrastructure and Chapter 9 – Natural Heritage.

Chief Executive's Recommendations

Consider submissions above where relevant as part of the development and implementation of Actions NBS3, NBS7, NBS8, NBS10, RM11 and RM21.

NO amendments necessary for Text or Actions.

Miscellaneous

110	Implement the Green Space Factor
-----	----------------------------------

110	Implement the Green Points System
-----	-----------------------------------

Chief Executive's Response

GRaBS ("GReen And Blue Space adaptation for urban areas and eco towns"), was a European partnership of 14 organisations, which worked towards integrating climate change adaption into regional planning and development. The project was co-funded by the EU through the Interreg fund.

An Expert Paper, including a tool/methodology for calculating the amount of green infrastructure needed on a new development, named the Green Space Factor, was published in 2011. Further information available at:-

<https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=c6ecd8bc-a066-435f-80d6-d58e47ab39a7>

The Fingal Development Plan 2017-2023 already embeds the support for green infrastructure and biodiversity in the design of new developments, reference Chapter 8 – Green Infrastructure, Chapter 9 – Natural Heritage and Chapter 12 – Development Management Standards.

This submission would need to be considered by the Planning & Strategic Infrastructure Department in the context of future policy development related to the Fingal Development Plan.

Chief Executive's Recommendations

Refer submission to the Planning & Strategic Infrastructure Department.

NO amendments necessary for Text or Actions.

Part 2: FCC & DLA Submissions with specific responses

Submissions Re Afforestation

Chief Executive's Response

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

The Council will continue to support, implement and expand tree planting programmes across the County and this is currently reflected in the Draft CCAP.

Chief Executive's Recommendations

NO amendments necessary for Text or Actions.

Actions on Resource Management

Part 1: FCC submissions with summary responses

Subgroupings

1. Procurement
2. Waste Management
3. Litter & recycling in the public realm
4. Landfill management
5. Water conservation
6. Awareness

Procurement

Submission No	Comment Summary
29	ban on disposable items and single use plastic (cutlery, plastic cups and large cups) at music events
31	The council should ban the distribution of leaflets, handouts etc at any Council backed events or parades
35	Fingal to adopt a green procurement policy
49	8. Establish working group to look at implementation of "Green Deal" for Fingal construction contracts with aim of reducing natural material extraction in capital contracts

Chief Executive's Response

The Draft CCAP includes 7 relevant Actions:-

RM1 Implement green procurement where feasible starting with office consumable.

RM2 Implement green procurement at Council supported events where feasible, including reduction of single use plastics.

RM4 Remove all single use items from Council canteens.

RM6 Promote Conscious Cup campaign.

Most of the issues raised are already supported in the Actions above which are included in the Draft CCAP.

The Council has already starting removing single use items from canteens and it is shortly intended to commence green procurement for office consumables.

The development of a “green deal” scheme for construction will first have to be developed as a policy at national level.

Chief Executive’s Recommendations

Consider submissions above where relevant as part of the development and implementation of Actions RM1, RM2, RM4 and RM6.

NO amendments necessary for Text or Actions.

Waste Management

Submission No	Comment Summary
13	request candidates to avoid the use of single use plastics
55	Provide households with compost bins (Grant) to help waste management
59	Also consideration should be given to the development of a Green Waste Processing Facility that could convert our Green Waste to Compost. This could then be sold back to communities.
109	Establish compost heaps in re-cycling centres rather than charging for green waste.
111	Work with businesses to distribute waste food to local charities
111	Create a brand for local businesses to aspire to in terms of commitment to reduce waste and packaging
111	Promote greater recycling and re-use of inert construction and demolition waste

Chief Executive’s Response

The Draft CCAP includes 2 relevant Actions:-

RM8 Promote recycling centres and expand the range of materials accepted where possible.

RM21 Develop and implement a Climate Change Awareness Grant Programme for schools and communities.

Brown bins for the acceptance of material suitable for composting are made available to most households in the County by private waste companies. This makes it less viable for the Council to be directly involved in the provision of composting facilities. Re the brand for local businesses in terms of reducing waste and packaging, the Council is supportive of this. Local businesses have already taken the initiative on this with the formation of the Plastics Food Alliance for the food sector. The Council supports recycling and reuse of C. & D. waste through the Regional Waste Plan policies and initiatives.

However, the Council can play a role in promoting the use of brown bins and home composters.

Chief Executive’s Recommendations

Consider submissions above where relevant as part of the development and implementation of Actions RM8 and RM6.

NO amendments necessary for Text or Actions.

Litter & recycling in the public realm

Submission No	Comment Summary
9	More Recycling facilities in public spaces
53	3 bin system in public areas
54	Put more bins in public zones
66	Information campaign around bring centres
66	Introduce a pilot scheme of segregated litter bins for the different waste streams
96	I want to see more recycling bin in local area for public use.
106	Resource Management: Balbriggan Tidy Towns is central to litter management in the town and will be happy to work with Fingal Co. Co. on marine litter clean up initiatives. Balbriggan needs more bins, with a preference for recycling and big belly bins. Resources should be provided for Tidy Towns groups to segregate waste and reclaim recyclables. Tidy Town also supports the proposed Refill initiative to combat single use plastics. Tidy Towns would recommend the installation of water butts at public buildings to facilitate watering plants by Council employees and voluntary groups.

Chief Executive's Response

The Draft CCAP includes 7 relevant Actions:-

RM9 Trial recycling bins in regional parks

RM10 Implement a programme for the installation of big belly bins across the County to reduce collection frequencies and emissions.

RM11 Support and promote the inclusion of climate change initiatives in tidy town, green schools and cleaner communities.

RM13 Explore collaboration with Refill.ie to reduce single use drinking water bottles.

RM17 Assess the feasibility of including rainwater harvesting on all new Fingal public, operational and social buildings and provide where viable and appropriate.

RM24 Establish a network of public drinking water fountains to help reduce plastic waste.

RM25 Examine the feasibility of retrofitting rainwater harvesting measures in existing Council buildings, particularly for vehicle washing, toilet flushing and landscaping.

The issues made in the submissions are of merit and are already expressed in the Actions above which are included in the Draft CCAP.

Chief Executive's Recommendations

Consider submissions above where relevant as part of the development and implementation of Actions RM9, RM10, RM11, RM13, RM17, RM24 & RM25.

NO amendments necessary for Text or Actions.

Awareness

Submission No	Comment Summary
11	Perhaps organise some kind of repair/upcycling class. (Link to Men's Shed?)
12	Ensure all libraries stock books on the topic of sustainability and climate change for children
19	a whole new Fingal internet site 'Happy Fingal', where activity/sports/community etc groups, positive biodiversity action plans, beach-clean-ups and so on can stick a pin and let others know what's going on in their locality.
33	Expand the FCC text messaging network and include information on FCC actions on climate change and tips on householder actions which can assist
33	can FCC encourage our local producers to use alternative re-cyclable paper and card please
35	Pop up roadshows in different towns and villages throughout the county to ensure continued engagement with schools and businesses
40	banning of plastic takeaway packaging, straws, cups, cutlery etc. to be replaced with e.g. rented stainless steel on deposit, rented beer glasses such as at German beer festivals, or Nalgene/ bamboo cups with silicone lids and deposits.
40	Promote cloth napkins.
53	Education in schools for waste reduction
55	More re-usable cups, bottles to reduce the amount of unrecyclable plastics
55	Have a water conservation event for teachers and students
55	Awareness campaigns about environmental issues to increase public

	awareness
55	Promote the use of re-usable water bottles
58	encourage supermarkets to cut down on all the plastic packaging
64	Produce a clear management plan to assist individuals and families reduce their own carbon emissions.
64	Develop links with youth groups and schools working to stop climate change.
65	ECO-UNESCO proposes the establishment of a Climate Action Environmental Education fund.
70	Establishment of an annual Young People's Climate Action Monitoring Forum
74	Encourage chamber of commerce to reduce use of single use plastic
74	Promote recycling depots through regular information campaigns
76	Is it possible to ask the producers/wholesaler/retailer to curtail use of packaging to absolute minimum use, only where absolutely necessary and to ask the householder to avoid using clingfilm?
82	As proposed in point 29 of the plan, we agree that there should be more awareness raised about this plan and climate change in Fingal, but we would suggest more than just one annual meeting about the issue and would also suggest more workshops and presentations in secondary and primary schools in the area.
88	"All School education should include "Environmental Protection" as part of its curriculum. This should not be confined to secondary school students only but should be an integral part of the education system from the ground up.
93	A significant percentage of the marine debris found globally has been attributed to fishing gear. Fishing related debris is found in all corners of the world. Abandoned fishing lines and hooks are snaring wild birds instead of fish. In fact all types of marine life are suffering the consequences of 'Ghost Fishing Gear', which is a term that describes any abandoned, lost or discarded fishing gear which continues to catch and kill marine life. To reduce the amount of "Ghost Fishing Gear" warning signs should be placed around harbours and marinas informing fishermen and the general public of the potential effects of dumping at sea. To increase the Public's awareness of our environment additional signage and art installations depicting bio-diversity and "care for the environment" themes should be placed strategically around town centres and public sites.
101	The students of Malahide Community School would like to see more information and a grant available for water saving devices in their own homes. The Council should inform the public of the financial cost of water treatment and the environmental cost of water wastage.

102	<p>"I would love to see Fingal take the lead in our country on highlighting to our supermarkets the need to stop packaging products in plastic so much. Initiatives should be given to those who provide produce in bulk and allow customers to bring their own containers/bags to pack produce. All schools and offices should be encouraged and educated in stopping the use of single use plastics for things like cups, cutlery etc. How about having drop off points that you can put plastic bottles in for money back?</p>
109	<p>"There is an urgent need for more public engagement through FEN, PPN, Community Groups, Schools, Scouts, Tidy Towns and on the ground in the fantastic public parks and coastal amenities in Fingal.</p> <p>This could start with more signage identifying local flora and fauna, collection albums, Biodiversity Ireland Swatches for pollinators, plants and trees.</p> <p>Greater safe cycle access to these amenities is essential to encourage family cycling.</p> <p>Appoint biodiversity guides in parks and beaches for the summer.</p> <p>Support North Dublin growers and re-establish the market garden. Reduce imports of vegetables. No plastic packing."</p>
113	<p>"See attachment: An opportunity exists to enhance public engagement and citizen participation in various actions of this plan, it is hoped that advantage is taken of this.</p> <p>An opportunity exists to build greater relationships between the Climate Action Team, the Linkage Group and the PPN. Inclusion in the membership of the Fingal Coastal Liaison Group and Biodiversity Forum would be welcomed.</p>
115	<p>"I welcome the fact that public consultation is taking place on the draft plan. However, Fingal County Council and the other local authorities decided in adopting the "Strategy towards Climate Change Action Plans" that public consultation was to be used to identify develop many of the actions to be included in the plans. Unfortunately this did not happen.</p> <p>In our response to the consultation on the draft Strategy, the Green councillors in the four Dublin local authorities specifically identified the importance of public participation in the development of the plans, including through workshops and other opportunities for personal engagement (as opposed to solely written submissions.) We specifically pointed to the success of this sort of participative approach in Vancouver. I also subsequently pointed to the examples of good quality engagement by the Planning Department of Fingal County Council in the initial stages of the development of the current County Development Plan, with workshop-type events at which public input was gathered. The need for public participation in developing the draft Plans was agreed by the Council and reflected in the final Strategy. It is unfortunate that that Strategy was not implemented as agreed.</p> <p>The consultation events for this draft plan were very welcome and effective. However, they should have been expanded into the sort of workshop events used for the Development Plan.</p> <p>At this stage, the Plan should now provide for more detailed public</p>

	<p>participation in developing actions. This would probably most effectively be done with separate events under each of the 5 Action Areas in the Plan, and the Plan should set this out accordingly.</p> <p>The success of the consultation events demonstrated the level of public interest in the topic; the development of further actions under the 5 Action Areas should build on that interest and enable people to engage further with the Council's climate protection work.</p>
--	---

Chief Executive's Response

The Draft CCAP includes 7 relevant Actions:-

RM1 Implement green procurement where feasible starting with office consumable.

RM2 Implement green procurement at Council supported events where feasible, including reduction of single use plastics.

RM4 Remove all single use items from Council canteens.

RM6 Promote Conscious Cup campaign.

RM11 Support and promote the inclusion of climate change initiatives in tidy town, green schools and cleaner communities.

RM12 Support marine litter clean up initiatives.

RM19 Develop and implement an ongoing public Climate Awareness Programme.

The Council notes the comments re the consultation process and the various suggestions re improved information for, and with the public. Developing ongoing public awareness and engagement processes is a central theme of the Draft Plan and the suggestions will be considered as part of the implementation of the Plan.

There are some issues raised above related to 3rd parties which are not within the powers of the Council eg. requiring supermarkets to reduce the amount of packaging, banning single use items generally etc. The issue of marine debris will require national and international co-operation to implement policies of prevention and reduction.

However, the Council can assist in making consumers more aware of these issues and the power they have to influence manufacturers/retailers by making sustainable choices when purchasing goods. The Council can also help promote the prevention, reuse, recycling and responsible disposal of purchased goods and packaging when no longer required.

The Council has already starting removing single use items from canteens and it is shortly intended to commence green procurement for office consumables.

Chief Executive's Recommendations

Consider submissions above where relevant as part of the development and implementation of Actions RM1, RM2, RM4, RM6, RM11, RM12 & RM19.

NO amendments necessary for Text or Actions.

Miscellaneous

Submission No	Comment Summary
2	No mention of circular economy
18	Use Graywater from WwTW to irrigate crops
22	Ditto
23	Divest from fossil fuel companies
49	1. Develop a Circular Economy Strategy for Fingal in conjunction with Eastern Midlands Waste Management Region Office and with other Dublin LAs.
49	2. Own a theme - textiles, food waste, furniture exchange and develop looped system programmes.
49	2. Embed social enterprise and circular economy modules into LEO start up support programmes and training and skills provision.
49	3. Develop or promote the disbursement of business grants for eco-innovation and eco-design
49	4. Work with OGP to develop clear green criteria in council procurement strategies and processes.
49	5. Support National Circular Economy Centre activities.
49	6. Embark on five year strategy to becoming a Zero Waste City. Set appropriate cross-departmental targets.
49	7. Support the development of re-use and repair shops and cafes including advice and assistance in relation to practical administrative and legal obstacles.
92	<p>Local Commuity Markets:</p> <p>Local towns should be supported and encouraged to buy locally produced goods. Locally produced goods, with short delivery times can remove the need for goods to be prepacked in plastic. Goods could be sold at local markets, encouraging Community buy in and support for locally produced goods. Balbriggan is very fortunate to have close links to major food producing businesses in the area which have taken an active part in the development of the town in the past. In addition, grassroots groups are starting to show keen interest in developing the sale and distribution of locally produced goods with sustainability in mind. Help is required to bring these groups together so that local groups can join hands with food producers. By working together locally produced goods can be brought to the local market without the overheads and environmental costs of transporting the same goods from far and wide. Support for Community groups that are willing to work with local producers should be encouraged and promoted by the local council, providing funding</p>

	<p>and equipment to sustain such projects moving forward.</p> <p>Reuse Projects - Circular Economy</p> <p>Local Markets could also be used by sports clubs for reselling donated sports equipment and clothing at reduced prices to support funding for the clubs. Equally sports clubs could operate on a “swap-shop” basis where clothes and equipment can be swapped between members for free. For example, Hurling helmets, shorts, boots, etc bought for small children that outgrow these items quickly can be swapped between parents, thus saving money and reducing waste. This type of reuse could be used to initiate a type of circular economy within the community and could extend beyond sports equipment/clothes quickly.</p>
--	--

Chief Executive’s Response

The Draft CCAP includes 3 relevant Actions:-

NBS5 Engage with the agri-food sector to gain an understanding of how Fingal might better support more sustainable farming practices.

NBS6 Develop climate change initiatives in partnership with local farmers and other stakeholders.

RM21 Develop and implement a Climate Change Awareness Grant Programme for schools and communities.

The issue of grey water from waste water treatment plants being used for irrigation is a matter for Irish Water.

In relation to divesting from fossil fuel companies, the Fossil Fuel Divestment Act 2018 was signed by the President in December 2018. The Council will await guidance or policy advice on the implications of the new Act for local authorities.

The local agri-food sector is also supported in Chapter 6.10 of the Fingal Development Plan 2017-2023.

Most of the remaining issues fit within the broad concept of the Circular Economy which while the principle is supported by many of the Actions in the Draft CCAP, there is no specific reference to the Circular Economy in any of the Actions.

Chief Executive’s Recommendations

Consider submissions above where relevant as part of the development and implementation of Actions NBS5, NBS6 and RM21 and new Action RM9 re the Circular Economy as proposed next.

INSERT NEW ACTION RM9 after RM8 at end of Waste Management Section in Resource Management Action Area, as follows:

RM9 Promote and support Circular Economy initiatives.

RENUMBER the remaining Actions appropriately.

Part 2: FCC & DLA Submissions with specific responses

Submissions Re Waste Management & Waste Collection Issues

Chief Executive's Response

A number of submissions suggested that the Council 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 issue is outside the remit of the CCAP.

Chief Executive's Recommendation

NO amendments necessary for Text or Actions.

Submissions Re Role of LAs in Deposit and Return Scheme

Chief Executive's Response

A number of submissions suggested that the Council 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 issue is outside the remit of the CCAP.

It should be noted that the Council operates 2 Recycling Centres which provide free facilities for a range of recyclable materials including plastics.

Chief Executive's Recommendations

NO amendments necessary for Text or Actions.

Submissions Re Banning single use plastic

Chief Executive's Response

A number of submissions were received recommending that the Council ban single use plastic items.

The Council has started to implement measures to ban single use items for its facilities starting with the main offices in Swords and Blanchardstown. Discussions have also started on banning such items at Council managed or supported events.

It is outside the remit of the Council 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 Recommendations

NO amendments necessary for Text or Actions.

Submissions Re Climate Action Workshops for Tidy Towns Groups

Chief Executive's Response

As part of the recent public consultation for the Draft Climate Change Action Plans (CCAP) as well as the public events a number of potential ideas have emerged on climate awareness and engagement. One for consideration which relates to Climate Action Workshops for Tidy Towns Groups. A number of workshops have already been undertaken with tidy town committees in rural areas and this could be undertaken across the Dublin Region.

Chief Executive's Recommendation:

It is recommended that a new action be included in the Resource Management Actions section of the Draft CCAP.

INSERT new Action at end of Awareness Section of Resource Management Action and number/renumber accordingly:-

Pilot Climate Action workshops with Tidy Town committees to promote awareness of climate action at a local level.

Milestone 4: Implementation:

Part 1: FCC submissions with summary responses

Submission No	Comment Summary
62	Review the final national biodiversity action plan
72	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.
73	incorporating the Climate Action Plan into the Development Plan via statutory variation

Chief Executive's Response

The Planning & Infrastructure Department have advised that they are agreeable to incorporating the Climate Action Plan into the Development Plan at the next suitable opportunity.

The National Biodiversity Action Plan has been referenced in the Draft CCAP and will be reviewed as relevant in the development and implementations of Actions.

The link between sectoral plans is dealt in detail in a following section and it is proposed to add additional text to the Draft Plan to reflect this issue.

Chief Executive's Recommendations

NO amendments necessary for Text or Actions.

Part 2: FCC & DLA Submissions with specific responses

Submissions Re Draft Plan should set out possible other funding sources for climate actions

Chief Executive's Response

This suggestion has merit and it is proposed to add new text as below.

Chief Executive's Recommendations

REPLACE the following text on Page 90 last para of the Draft CCAP ~~“In association with Codema, FCC will seek technical and financial supports from EU programmes. Private commercial opportunities will be encouraged where possible to deliver solutions. Existing and new third-level research partnerships and new areas of research will be incorporated into relevant actions.”~~

with the following NEW TEXT:-

“FCC in association with the DLA, Codema and CARO will seek technical and financial supports for climate research and practical low carbon solutions. International funding streams that fund climate change related activities are available, such as Interreg Europe, Interreg NWE, LIFE and Horizon 2020. Nationally programmes such as SEAI's better energy communities and the RD&D provide grants for research and building solutions. SEAI have also part funded the development and roll out of the Home Energy Saving Kits to engage with citizens as well as provide grant aid to develop the energy performance contracting projects.

DCC & SDCC recently secured significant funding from the Climate Action Fund and the DLA will continue to actively pursue projects eligible for this funding. Codema and CARO will continue to research potential funding opportunities and partnerships with third level institutions. Finally, private sector partnerships are also important to realise low carbon solutions for the DLA and this will be encouraged and facilitated where possible.”

Submissions Re 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 two cross-departmental Climate Teams who will be responsible for implementing the actions included in the CCAP - one focussing on energy and sustainability within Council facilities and the second on co-ordinating the CCAP generally. The development and implementation of CCAP actions will be supported by both Codema and the Dublin Climate Action Regional Office. Codema will provide ongoing support to the CCAP in the areas of research, planning, technical assessment, cost benefit analysis, procurement, project management, funding applications and communications. The Dublin CARO will work with all four Dublin local authorities in implementing CCAP actions, including developing research opportunities and pilot project across the four Dublin local authorities. The CARO will also have a role in reviewing action implementation across the four Dublin local authority CCAPs.

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

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

Chief Executive's Recommendation

NO amendments necessary for Text or Actions.

Submissions Re Developing best practice in climate change

Chief Executive's Response

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 addressed in the Draft CCAP.

Chief Executive's Recommendation

NO amendments necessary for Text or Actions.

Submissions Re Wider Climate Change Agenda and Urban Sustainability

Chief Executive's Response

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

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

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

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

Chief Executive's Recommendations

NO amendments necessary for Text or Actions.

Submissions Re Interaction with Sectoral Climate Change Issues

Chief Executive's Response

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 Recommendations

INSERT NEW TEXT at end of The National Context – Ireland section 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.”

Submission Re Just Transition

One submission raised the concept of “*just transition*” and noted that it is not referenced in the Draft Plan.

Chief Executive’s Response

This issue was discussed in *Chapter 2: Supporting a Just Transition* of the Oireachtas “*Climate Change: a cross party consensus on climate action*” Report, March 2019. Two priority recommendations were made in the Report including establishing a Task Force to proactively consider the upcoming challenges of the rapid transition to a low carbon economy.

It is agreed that the issue of “*just transition*” should it should be referenced in the Plan.

Chief Executive’s Recommendations

Refer to Page 105 of this Report for details of a Chief Executive’s Recommendation to INSERT NEW TEXT to acknowledge the Oireachtas Report and the principle of “*just transition*”.

Milestone 5: Monitoring & Iteration:

Part 1: FCC submissions with summary responses

There were none

Chief Executive's Proposed Amendment to Update Draft Plan

Additional Text *in green italics* to be included in Milestone 5: Covenant of Mayors for Climate and Energy section.

FCC, along with over 7,000 cities and regions in 57 countries, is a signatory to the Covenant of Mayors for Climate and Energy, which is the world's largest movement for local climate and energy actions. The signatory cities pledge action to support implementation of the EU 40% greenhouse gas reduction target by 2030 and the adoption of a joint approach to tackling mitigation and adaptation to climate change.

Accordingly, FCC commits to submitting a Sustainable Energy and Climate Action Plan (SECAP), outlining the key actions it plans to undertake, and this must be submitted within two years of signing up to the initiative. *This current Climate Change Action plan is forming the basis for the SECAP submission, The plan which will feature a Baseline Emission Inventory to track mitigation actions and a Climate Risks and Vulnerability Assessment. FCC's county wide baseline emissions inventory was completed in 2018 and will be used as a benchmark to monitor emission reductions up to 2030. Furthermore, Codema will develop an energy master plan for the entire Dublin Region. The Dublin Region Energy Master Plan will create evidence-based, realistic, and costed pathways for the Dublin Region to achieve its carbon emissions reduction targets to 2030 and beyond, up to 2050. The plan will focus on the energy areas where actions can be taken to introduce energy efficiency measures and reduce CO₂ emissions.* This commitment *with the Covenant of Mayors* marks the beginning of a long-term process, with cities committed to reporting every two years on the implementation progress of their plans.

Part 2: FCC & DLA Submissions with specific responses

Submissions Re CCAP Future Iterations

Chief Executive's Response

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 Recommendations

NO amendments necessary for Text or Actions.

Submissions outside of main themes:

Submissions Re Carbon Tax

Chief Executive's Response

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

NO amendments necessary to Text or Actions.

Submissions Re Addressing climate change in other sectors

Chief Executive's Response

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 the County more climate resilient..

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 issue is dealt with adequately in the Plan.

Chief Executive's Recommendation

NO amendments necessary for Text or Actions.

Submissions Re Health Effects of Climate Change Actions

Chief Executive's Response

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

NO amendments necessary for Text or Actions.

Submissions Re Directly Elected Mayor

Chief Executive's Response

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

NO amendments necessary for Text or Actions.

Submissions Re Climate Refugees

Chief Executive's Response

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

NO amendments necessary for Text or Actions.

Submissions Re Friends of the Irish Environment v the Irish Government

Chief Executive's Response

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

NO amendments necessary for Text or Actions.

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 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)</p>

	Submissions on the Environmental Report	SEA and AA Response
		<p>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 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</p>

	Submissions on the Environmental Report	SEA and AA Response
		AA to ascertain if likely significant environmental effects or significant effects on European sites would arise. Both processes have identified additional mitigation measures for the CCAP and the SEA has also provided for a monitoring regime, which is included within this CCAP. All mitigation measures identified for the CCAP through the SEA and AA process will be adhered to and implemented over the course of the plan.
	<p>Assessment of Alternatives</p> <p>We welcome that the EPA 'Developing and Assessing Alternatives in Strategic Environmental Assessment' (2015) guidance document has been considered in preparing and assessing alternatives. We also note the alternatives considered in the SEA, and the selection of the preferred alternative</p>	Noted.
	<p>Additional Plan Considerations</p> <p>Irish Water's Draft National Water Resources Plan should be useful to refer to, in terms of ensuring security of drinking water supply within the Plan area, is also considered. This plan includes consideration of climate change impacts. Aligning adequate and appropriate critical service infrastructure and population / economic growth of the Dublin region is essential.</p>	<p>Noted and agreed. Chapters 4 and 7 of the SEA ER will be expanded in the material assets section to discuss this. Chapter 3 will include reference to the Draft National Water Resources Plan</p>
	<p>The link between the Plan and the sectoral adaptation plans could also be expanded on. This would clarify the alignment between the plan and other higher level sectoral plan.</p>	<p>Noted and agreed. Chapter 3 of the SEA ER will expand upon this and the links to other high level sectoral plans where appropriate</p>
	Mitigation Measures	
	<p>We acknowledge the SEA recommendations, to improve the Plan in terms of integrating wider environmental considerations into the Plan. We note the recommendation</p>	<p>Noted, during the preparation of such a plan, the existing</p>

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

	Submissions on the Environmental Report	SEA and AA Response
		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.	<p>Noted.</p> <p>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:</p> <p>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</p>

	Submissions on the Environmental Report	SEA and AA Response
		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.
	You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.	Noted and agreed.
Dylan Potter , Geological Survey Ireland		
	Geoheritage Information provided on Geoheritage data.	
	Groundwater With regard to Flood Risk Management, there is a need to identify areas for integrated constructed wetlands. We recommend using the GSI’s National Aquifer and Recharge maps on our Map viewer to this end.	Noted, this will be highlighted in the SEA ER and
	Urban Geology As the proposed developments take place in an urbanized environment, we suggest looking at our Urban Geology section on our website. Geological Survey Ireland produces urban geoscience data on a project basis, informing the areas of soil geochemistry and contamination, 3D modelling of ground conditions, and assessing ground motions that present a hazard to citizens in the urban environment. We also have a GeoUrban section to our Map Viewer which covers the Greater Dublin Area. Nature based solutions should be considered even in an urban environment. For example, an analysis of soil sealing could be done to determine levels of permeability in the	Noted-

	Submissions on the Environmental Report	SEA and AA Response
	Greater Dublin Area. We recommend using the GSI's Quaternary subsoil map and geotechnical database for this task.	
	<p>Coastal Vulnerability</p> <p>Vulnerability of the coast is intimately correlated to its characteristics and the intricate physical processes that intervene on its evolution. Strategies for coastal protection should include information from local to regional coastal vulnerability and impact assessments. Geological Survey Ireland is undertaking a new coastal vulnerability to sea-level rise mapping initiative. The maps produced in this project will aim to identify the coastal regions most likely to be affected by impacts of sea-level rise by using a coastal Vulnerability index (CVI) approach. Areas of assessment will include getting up-to-date information on current state of coastal defences, records of areas of inundation during extreme events for validating models and access to quality controlled and publically available tide gauge records for Dublin Bay.</p> <p>Management strategies for adaptation should be flexible and centred on monitoring the most vulnerable areas. Monitoring short and long-term responses in soft cliffs, such as shoreline and sediment volumetric changes is key to understand coastal behaviour and to validate forecasting models. The current ESA (European Space Agency) funded coastal erosion project (Coastal Change from Space), which GSI is a partner will extensively look at some of these issues over the next two years (2019-2021). This project will provide an intertidal extent model and shoreline extraction tools, will monitor sediment change in the near shore using primarily satellite derived bathymetry, and quantify backshore to foreshore sediment volumetric change over the last 20 years for targeted areas.</p>	<p>Noted.</p> <p>Reference to this data, modelling and the Coastal Change for Space research project will be included in the SEA ER</p>
	Oonagh Duggan, BirdWatch Ireland	
	<p>5.0 Biodiversity Adaptation to Climate Change</p> <p>Ireland's draft Biodiversity Sectoral Climate Change Adaptation Plan⁸ which is subject to public consultation until April 17 2019 states that 'Irish biodiversity is highly vulnerable to the impacts of climate change and has a low adaptive capacity compared to other vulnerable sectors. Climate change has major indirect impacts on Irish biodiversity through its interaction with other stressors, in particular habitat fragmentation and loss; overexploitation;</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>

	Submissions on the Environmental Report	SEA and AA Response
	<p>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>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 In 2013 BirdWatch Ireland published a report on the Impacts of Sea-level Rise on the Birds and Biodiversity of Key Coastal Wetlands⁹. The report assessed the level of risk posed to each of 52 waterbird species by increasing sealevels such that those risks are:</p> <ul style="list-style-type: none"> o high for species with wholly coastal species distributions and which rely on intertidal habitats (such as Shelduck <i>Tadorna Knot</i> <i>Calidris canutus</i> and Sanderling <i>Calidris alba</i>), to medium for species as above but that can feed in alternative locations, such as on grasslands (Light-bellied Brent Goose <i>Branta bernicla hrota</i>, Oystercatcher <i>Haematopus ostralegus</i> and Black-tailed Godwit <i>Limosa limosa</i>) and for those with predominantly coastal distributions but which are localised in Ireland (Greenland White-fronted Goose <i>Anser albifrons flavirostris</i> and Bewick's Swan <i>Cygnus columbianus bewickii</i>), and too low for other waterbirds whose distributions are not restricted to the coast (e.g. Teal <i>Anas crecca</i>, Golden Plover <i>Pluvialis apricaria</i> and Lapwing <i>Vanellus vanellus</i>) or which occur predominantly in deeper water (e.g. Red-throated Diver <i>Gavia stellata</i>, Great Crested Grebe <i>Podiceps cristatus</i>, Cormorant <i>Phalacrocorax carbo</i> and Common Scoter <i>Melanitta nigra</i>) <p>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 the following in the context</p>	<p>Noted. These comments will be included in the final SEA ER.</p> <p>The mitigation measure proposed in relation to retrofitting of housing and swifts is recommended for inclusion in the CCAP.</p>

	Submissions on the Environmental Report	SEA and AA Response
	<p>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. 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>7.0 Breeding river birds</p> <p>Dublin's rivers and associated habitats are known to contain breeding Annex 1 Kingfisher, Dipper, Grey Wagtail, and Sand Martin. In order to protect nest sites and to provide adaptation solutions under a changing climate but also within the context of any flood mitigation measures, BirdWatch Ireland recommends that further survey work is undertaken to determine where these birds are breeding so as to conserve and improve breeding sites and also to prepare an evidence-based report on appropriate adaptation measures for these important species. Ensuring that river ecosystems are healthy and support fish and insect populations stocks is also critical as these are food</p>	

	Submissions on the Environmental Report	SEA and AA Response
	<p>sources 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 some Swift breeding sites may be lost due to construction work. It is really important that Swift breeding sites are investigated in Dublin and that any works to buildings with known breeding sites include actions such as insertion of 'Swift bricks' to provide alternative nesting sites for them. All new builds or deep retrofit programmes should also include Swift bricks in those projects. BirdWatch Ireland's publication Saving Swifts is due out in 2019 and will help inform the conservation of Swifts in Ireland."</p>	
	<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. Please note the revised mitigation measures below, 2 are not recommended for inclusion for year 1 due to workload but will be reviewed in May 2020 as part of the CCAP review.</p>
	<p>9.2 There is no mention of the requirements of Article 4(4) of the Birds Directive the second sentence of which states 'Outside these protection areas, Member States shall also strive to avoid pollution or deterioration of habitats'. 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</p>	<p>Noted, this will be included in the SEA ER and the NIS.</p>

	Submissions on the Environmental Report	SEA and AA Response
	issues in C-418/04. All efforts must be made to enforce the regulations to support birds in the wider countryside.	
	9.3 BirdWatch Ireland would like clarification on the statement in the NIR that there will be no significant adverse effects on the European sites when it is unclear whether the suggestions in Table 7.2 will be incorporated into the final plan. This element of doubt means that NIS is open to challenge. The suggested text is NOT in the draft climate action plan submitted for consultation. We would appreciate clarification of this.	Noted, for clarification the mitigation measures in Table 7.2 will be included in the final plan. See the end of this document for measures. Please note the revised mitigation measures below, 2 are not recommended for inclusion for year 1 due to workload but will be reviewed in May 2020 as part of the CCAP review.

Recommended Mitigation Measures for Fingal CCAP

These Mitigation Measures were identified in Section 7 of the Natura Impact Statement and Section 8 of the SEA ER and will also be included in the final SEA Environmental Report and AA Natura Impact Statement. Note that two are not included in the CCAP for year 1 but will be reviewed and considered in May 2020.

		In CCAP? Yes/no
Overarching measure New measure – for consistency with DLR and DCC	An integrated approach to decision making in relation to these climate change actions is recommended.	YES
New Measure – again for consistency with the three other DLAs	Consider the feasibility of preparation of an Integrated Coastal Zone Management Plan that addresses natural and cultural heritage and aligns with the Marine Spatial Planning Directive	No. The Council has a significant workload in years 1-3 of the Action Plan. This issue will be considered in the annual review of the Plan Actions in May 2020.
	Work with other Dublin Local Authorities to 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	No. The Council has a significant workload in years 1-3 of the Action Plan. This issue will be considered in the annual review of the Plan Actions in May 2020.
Flood Resilience Action 8	Develop template to capture	YES

	impacts, response and costs (including ecosystem services/natural capital costs) for all major climate events	
Preamble to Flood Defence actions	The following flood defence will incorporate nature based solutions and biodiversity enhancement measures where possible	YES
Nature Based Solutions Action 4	Map access to green space in County to identify areas of need and integrate green infrastructure in access considerations	YES
Action 8	Identify sites for woodland planting that promotes an appropriate native species mix	YES
Action 17	Prepare a heathland management plan for Howth with ecological input	YES
Action 18	Prepare a fire management plan for heathland on Howth that includes environmental considerations	YES

General Comments

1	Support for all these projects is very important.
3	V good presentation, loads of easy ways to be “greener” across the board
72	There would be merits in assigning coded references for the Actions under each of the specific Action Areas (e.g. EB01, TR01 etc. This will assist in the ongoing monitoring of the performance against the specific actions.

Chief Executive’s Response

Comments noted.

Chief Executive’s Recommendation

Coded reference to Action Area to be added before each individual action for example Action No 1 in Energy & Buildings to be referenced as Action EB1.

Chief Executive’s Proposed Amendment to Update Draft Plan

Chief Executive’s Recommendations

INSERT New Action in Energy & Buildings Action section:-

In all Council building projects, new build or retrofit, Swift Bricks or other nesting sites for swifts will be provided where practicable.

Chief Executive’s Proposed Amendment to Update Draft Plan

AMEND TEXT in Extreme Weather Events Ection, Page 30, 2nd para

As shown in the Timeline of Major Climatic Events (Figure 4), the frequency of **prolonged** extreme cold spells in Ireland has increased, and in the Dublin Region there are additional risks due to these extreme temperatures. During Storm Emma, prolonged periods of cold resulted in water pipes freezing and then bursting as the temperatures started to rise, which left homes in the County without water.

Chief Executive’s Proposed Amendment to Update Draft Plan

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 have regard to the actions and recommendations of the Oireachtas *‘Climate Change: a cross-party consensus on climate action’* report and the All of Government Climate Action Plan.

Chief Executive’s Recommendation

INSERT NEW TEXT at end of THE NATIONAL CONTEXT – IRELAND section:-

“The implementation, monitoring and future updates of the Climate Change Action Plan will have regard to the Oireachtas ‘Climate Change: a cross-party consensus on climate action’ report (March 2019), including the principle of just transition, and the All of Government Climate Action Plan.”

Summary of CE Proposed Amendments

CCAP Introduction

Chief Executive's Recommendation

INSERT NEW TEXT at end of THE NATIONAL CONTEXT – IRELAND section:-

“The implementation, monitoring and future updates of the Climate Change Action Plan will have regard to the Oireachtas ‘Climate Change: a cross-party consensus on climate action’ report (March 2019), including the principle of just transition, and the All of Government Climate Action Plan.”

Chief Executive's Recommendation

INSERT NEW TEXT at end of The National Context – Ireland section 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.”

Milestone 2: Research

Chief Executive's Recommendation

INSERT NEW TEXT under ‘Public Awareness’ section:-

“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.

Chief Executive's Recommendation

INSERT NEW TEXT in Public Awareness Section:-

“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.”

Actions on Energy & Buildings

Chief Executive’s Recommendations

INSERT New Action in Energy & Buildings Action section:-

“In all Council building projects, new build or retrofit, Swift Bricks or other nesting sites for swifts will be provided where practicable.”

Actions on Transport

Chief Executive’s Recommendation

INSERT NEW ACTION T14 after T13 under Active Travel & Behavioural Change Section in Transport Action Area, as follows:

T14 Support the Greater Dublin Cycling Network Plan

RENUMBER the remaining Actions appropriately (incl. Actions referred to above).

Chief Executive’s Recommendation

AMEND Action T3 in Staff Travel under Transport Action Area by adding the following text to the current Action which reads *“Implement carbon offset programme for official flights”*:-

“investigate an appropriate offsetting scheme for the Council’s other business travel emissions.”

Actions on Flood Resilience

Chief Executive’s Recommendation

Amendments following SEA AA review:

Preamble to Flood Defence actions	<i>“The following flood defence will incorporate nature based solutions and biodiversity enhancement measures where possible”</i>
Flood Resilience Action 8	Develop template to capture impacts, response and costs (<i>including ecosystem services/natural capital costs</i>) for all major climate events

INSERT NEW ACTIONS FR11 & FR12 at end of Flood Risk Management Section in Flood Resilience Action Area:-

FR11 *Archaeological and heritage assets to form part of all climate risk assessments including opportunities for integration of cultural heritage in adaptative mitigations e.g. green infrastructure, cycle ways, nature-based solutions etc.*

FR12 *Identify projects and opportunities for collaboration with relevant stakeholders to assess and prioritise cultural heritage sites vulnerable to climate change*

RENUMBER the remaining Actions appropriately.

INSERT NEW ACTIONS FR24 & 25 end of Actions Awaiting Budget Section in Flood Resilience Action Area:-

FR24 *Carry out a Climate Change Risk Assessment of Fingal's Cultural Heritage to identify and survey the architectural and archaeological heritage sites and designed landscapes.*

FR25 *Develop maintenance and condition survey programmes for Council owned historic buildings and ancient monuments that are informed by climate change impacts.*

INSERT NEW ACTION EB34 at end of Actions Awaiting Budget Section in Energy & Buildings Action Area:-

EB34 *Conduct research and case studies on appropriate and sensitive retro-fitting/energy upgrading of traditional buildings to inform works to Council owned properties and to guide private owners.*

Chief Executive's Recommendation

INSERT NEW TEXT in the Flood Risk Management section of the Flood Resilience Action Area:-

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

Actions on Actions on Nature Based Solutions:

Amendments following SEA AA review:

Nature Based Solutions Action 4	Map access to green space in County to identify areas of need and integrate green infrastructure in access considerations.
Action 8	Identify sites for woodland planting that promotes an appropriate native species mix.
Action 17	Prepare a heathland management plan for Howth with ecological input.
Action 18	Prepare a fire management plan for heathland on Howth that includes

	environmental considerations.
--	-------------------------------

Actions on Resource Management

Chief Executive’s Recommendation

INSERT NEW ACTION RM9 after RM8 at end of Waste Management Section in Resource Management Action Area, as follows:

RM9 Promote and support Circular Economy initiatives.

RENUMBER the remaining Actions appropriately.

Chief Executive’s Recommendation

INSERT new Action at end of Awareness Section of Resource Management Action and number/renumber accordingly:-

Pilot Climate Action workshops with Tidy Town committees to promote awareness of climate action at a local level.

Milestone 4: Implementation:

Chief Executive’s Recommendation

REPLACE the following text on Page 90 last para of the Draft CCAP ~~“In association with Codema, FCC will seek technical and financial supports from EU programmes. Private commercial opportunities will be encouraged where possible to deliver solutions. Existing and new third level research partnerships and new areas of research will be incorporated into relevant actions.”~~

with the following NEW TEXT:-

“FCC in association with the DLA, Codema and CARO will seek technical and financial supports for climate research and practical low carbon solutions. International funding streams that fund climate change related activities are available, such as Interreg Europe, Interreg NWE, LIFE and Horizon 2020. Nationally programmes such as SEAI’s better energy communities and the RD&D provide grants for research and building solutions. SEAI have also part funded the development and roll out of the Home Energy Saving Kits to engage with citizens as well as provide grant aid to develop the energy performance contracting projects.

DCC & SDCC recently secured significant funding from the Climate Action Fund and the DLA will continue to actively pursue projects eligible for this funding. Codema and CARO will continue to research potential funding opportunities and partnerships with third level institutions. Finally, private sector partnerships are also important to realise low carbon solutions for the DLA and this will be encouraged and facilitated where possible.”

Milestone 5: Monitoring & Iteration:

Chief Executive’s Recommendation

Text indicated in *green italics* to be included in Milestone 5: Covenant of Mayors for Climate and Energy section.

FCC, along with over 7,000 cities and regions in 57 countries, is a signatory to the Covenant of Mayors for Climate and Energy, which is the world's largest movement for local climate and energy actions. The signatory cities pledge action to support implementation of the EU 40% greenhouse gas reduction target by 2030 and the adoption of a joint approach to tackling mitigation and adaptation to climate change.

Accordingly, FCC commits to submitting a Sustainable Energy and Climate Action Plan (SECAP), outlining the key actions it plans to undertake, and this must be submitted within two years of signing up to the initiative. *This current Climate Change Action plan is forms the basis for the SECAP submission, The plan which will feature a Baseline Emission Inventory to track mitigation actions and a Climate Risks and Vulnerability Assessment. FCC's county wide baseline emissions inventory was completed in 2018 and will be used as a benchmark to monitor emission reductions up to 2030. Furthermore, Codema will develop an energy master plan for the entire Dublin Region. The Dublin Region Energy Master Plan will create evidence-based, realistic, and costed pathways for the Dublin Region to achieve its carbon emissions reduction targets to 2030 and beyond, up to 2050. The plan will focus on the energy areas where actions can be taken to introduce energy efficiency measures and reduce CO2 emissions.* This commitment *with the Covenant of Mayors* marks the beginning of a long-term process, with cities committed to reporting every two years on the implementation progress of their plans.

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

Amendments following SEA AA review:

Overarching measure: New measure – for consistency with DLR and DCC

An integrated approach to decision making in relation to these climate change actions is recommended

Amendments following SEA AA review:

A section in the Final CCAP will be included that provides information on how the SEA and AA has influenced the plan process.

Strategic Environmental Assessment (SEA) is a statutory process, involving the systematic evaluation of the likely significant environmental effects of implementing the new Climate Change Action Plan before a final decision has been made to adopt it. SEA applies to environmental assessment of plans and strategic actions that influence and set the framework for projects. 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). 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. 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.

The SEA and AA processes have worked together to influence of plan preparation and the SEA process highlights where particular environmental sensitivities arise, and also make recommendations as to how proposed actions may be improved to increase their environmental performance.

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.

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.

Amendments following SEA AA review:

Include the following text under Milestone 5:

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.

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

AMEND Text as below – strikeout to delete text and *green italics* to indicate new text – as follows:-

Flood Resilience Action Area, 1st. Paragraph

Flooding is an ongoing challenge for *a key climate change risk facing* the Dublin Region. Climate change ~~increases the frequency and duration of~~ *is expected to increase the frequency and/or intensity of* heavy rainfall events and storm surges, which *would* increase the risk of flooding in *vulnerable areas of the City. Together with the Office of Public Works (OPW) and neighbouring local* authorities, FCC is actively working to implement projects and programmes that align with the EU Floods Directive and Water Framework Directive ~~which calls~~. *The Floods Directive calls* for member states to undertake strategic flood risk assessments and to ~~employ~~ *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 with an emphasis on 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.

Flood Resilience Action Area - References Section

- *The Planning Systems and Flood Risk Management Guidelines for Planning Authorities, November 2009*
- *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.*

Chief Executive's Recommendation

Coded reference to Action Area to be added before each individual action for example Action No 1 in Energy & Buildings to be referenced as Action EB1.

Chief Executive's Recommendation

Insert in Extreme weather events section, page 30 2nd para

As shown in the Timeline of Major Climatic Events (Figure 4), the frequency of **prolonged** extreme cold spells in Ireland has increased, and in the Dublin Region there are additional risks due to these extreme temperatures. During Storm Emma, prolonged periods of cold resulted in water pipes freezing and then bursting as the temperatures started to rise, which left homes in the County without water.

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

Submission No	Name	Organisation (if applicable)
CCAP 1	Anthony Brennan	
CCAP 2	Anon	
CCAP 3	Niall Gosson	
CCAP 4	Mary Berg	
CCAP 5	Mary Berg	
CCAP 6	Daniel O'Brien	
CCAP 7	Daniel O'Brien	
CCAP 8	Gus McManaman	
CCAP 9	John Gillian	
CCAP 10	Abdulwasii Ajaji	
CCAP 11	Cecelia Gavigan	
CCAP 12	Aoife Cannon	
CCAP 13	David Weitbrecht & Séamus Maguire	
CCAP 14	Claudine Gaidoni	
CCAP 15	Dominica Mc Kevitt	
CCAP 16	Philip Lydon	
CCAP 17	John Calvey	
CCAP 18	Ger McEvoy	
CCAP 19	Sarah Lavin	
CCAP 20	Tony Donnelly	
CCAP 21	Veronica Forsgren	
CCAP 22	Ger McEvoy	
CCAP 23	Susan Jefferies	

CCAP 24	Alain Kervallant	
CCAP 25	Brendan Fahy	
CCAP 26	Liv Gibbons	
CCAP 27	Emer Barry	
CCAP 28	Caoimhe O'Flaherty	
CCAP 29	Aoife Cannon	
CCAP 30	Aoife Cannon	
CCAP 31	Craig Benton	
CCAP 32	Mark Kielty	
CCAP 33	Skerries Tidy Towns	Skerries Tidy Town
CCAP 34	Heidi Kelly-Hogan	
CCAP 35	Niall McKiernan	
CCAP 36	Margie McLoone	
CCAP 37	Ray Bates	
CCAP 38	Linda Galbraith	
CCAP 39	Helena Bergin	
CCAP 40	Irish Tree Trail (Orla Farrell)	Irish Tree Trail
CCAP 41	Easy Treesie	Easy Treesie
CCAP 42	John Walsh	
CCAP 43	CRANN	CRANN
CCAP 44	James McAteer	
CCAP 45	Councillor Brian McDonagh	
CCAP 46	Elaine Dooley	
CCAP 47	John Connolly	
CCAP 48	Ian Keogh	
CCAP 49	James Walls	

CCAP 50	Skerries Educate Together NS	
CCAP 51	Loreto Secondary School, Balbriggan TY Students	
CCAP 52	Fran	
CCAP 53	TY Submission Blakestown Community School	
CCAP 54	TY Submission Fingal Community College Swords	
CCAP 55	TY Submission Loreto College, River Valley, Swords	
CCAP 56	D Dodd	
CCAP 57	Garrett Mullan	
CCAP 58	Barbara O' Donoghue	
CCAP 59	George Mongey	
CCAP 60	Adele Sleator	
CCAP 61	Geological Survey	Geological Survey
CCAP 62	Bird Watch Ireland	Bird Watch Ireland
CCAP 63	Sharo Technologies	Sharo Technologies
CCAP 64	Kirkpatrick Rockfield Coolmine residents	Kirkpatrick Rockfield Coolmine residents
CCAP 65	ECO-UNESCO	ECO-UNESCO
CCAP 66	Thomas Broughan TD	
CCAP 67	GNI	GNI
CCAP 68	ERVIA	ERVIA
CCAP 69	Austin Kennan	
CCAP 70	Joe O'Brien – Green Party	Green Party
CCAP 71	Irish Climate Science Forum	Irish Climate Science Forum
CCAP 72	EPA	EPA
CCAP 73	Councillor Roderic O'Gorman	Green Party

CCAP 74	Joan Burton TD	
CCAP 75	DAA	DAA
CCAP 76	Martina McTeigue	
CCAP 77	Liz Cleary	
CCAP 78	Cecilia Farley	
CCAP 79	Anne Reville	
CCAP 80	Laura Farrell	
CCAP 81	Michael Wylie	
CCAP 82	Aoife Whelan	
CCAP 83	Sarah Barron	
CCAP 84	Darren Clarke	
CCAP 85	Jenny O'leary	
CCAP 86	Shannette Budhai	
CCAP 87	Katie Hanratty	
CCAP 88	Sean Barry	
CCAP 89	Sean Barry	
CCAP 90	Sean Barry	
CCAP 91	Sean Barry	
CCAP 92	Sean Barry	
CCAP 93	Sean Barry	
CCAP 94	Sean Barry	
CCAP 95	Sean Barry	
CCAP 96	Arron Ayson	
CCAP 97	Adam Bolger	
CCAP 98	Saaga Rosti	
CCAP 99	Lilly Lauermann	

CCAP 100	Luc Garcia Louro	
CCAP 101	Andrea Wilson	
CCAP 102	Margaret O'Riordan	
CCAP 103	Ian Fleming	
CCAP 104	Anne-Marie McCarrick	
CCAP 105	Edward Stevenson	
CCAP 106	Sarah Kimberley	
CCAP 107	Matthew Sheridan	
CCAP 108	Margaret Mc Loughlin	
CCAP 109	Pat O'Gorman	
CCAP 110	RIAI / Joe Miller	RIAI
CCAP 111	David O Sullivan	
CCAP 112	Raghu Narayanam	
CCAP 113	Fingal PPN	Fingal PPN
CCAP 114	Anne Morrissey	
CCAP 115	Councillor David Healy	
CCAP 116	DOLORES MCALLORUM	
CCAP 117	Aileen Young	
CCAP 118	Sean Barry	
CCAP 119	Gerald O'Halloran	
CCAP 120	Helena Murphy	

Appendix B - Images of Public Consultation Material

Comhairle Contae
Fine Gall
Fingal County
Council



codema

Dublin's Energy Agency

JOIN US FOR

FINGAL COUNTY COUNCIL'S #COUNCILS4CLIMATEACTION PUBLIC INFORMATION EVENTS



MON 18 FEB	MAIN EVENT - SWORDS 5.30-8.30pm County Hall, Main Street, Swords	KIDS' CORNER!	WED 20 FEB	BALBRIGGAN EVENT 5.30-8.30pm Bracken Court Hotel, Bridge Street, Balbriggan
MON 25 FEB	BLANCHARDSTOWN EVENT 5.30-8.30pm Crowne Plaza Dublin, Blanchardstown Town Centre		THUR 28 FEB	SUTTON EVENT 5.30-8.30pm Marine Hotel, 13 Sutton Cross, Burrow, Sutton

FOR MORE INFORMATION, VISIT

www.dublinclimatechange.ie

Page 119



HAVE YOUR SAY! ON THE CLIMATE CHANGE ACTION PLANS

The public consultation process will run from **11 February - 25 March 2019**, during which time we encourage you to have your say on the Draft Climate Change Action Plans.

You can **make a submission** in the following ways:



Visit www.dublinclimatechange.ie and click on the link to your relevant Council

OR

Make a submission at one of our **#Councils4ClimateAction** public events taking place in February 2019

See back for details on the 4 events!

UPCOMING #COUNCILS4CLIMATEACTION PUBLIC INFORMATION EVENTS

SAT 16 FEB	DUBLIN CITY COUNCIL 12-5pm The Round Room at The Mansion House, Dawson Street
MON 18 FEB	FINGAL COUNTY COUNCIL 5.30-8.30pm County Hall, Main Street, Swords
TUES 19 FEB	SOUTH DUBLIN COUNTY COUNCIL 6-9pm County Hall, Belgard Square North, Tallaght
THURS 21 FEB	DLR COUNTY COUNCIL 3-7pm National Maritime Museum, Haigh Terrace, Dún Laoghaire

For more information, visit:
www.dublinclimatechange.ie

Tel: 01 707 9818 | E: events@codema.ie

Register
now on
Eventbrite.ie

DUBLIN LOCAL AUTHORITIES'

DRAFT CLIMATE CHANGE ACTION PLANS 2019 - 2024



#Councils4ClimateAction

www.dublinclimatechange.ie



HAVE YOUR SAY! ON FINGAL COUNTY COUNCIL'S DRAFT CLIMATE CHANGE ACTION PLAN 2019 - 2024

*Open to the public 5.30-8.30pm, light refreshments served
6pm - Address by Mayor of Fingal, Cllr Anthony Lavin
Followed by Fingal County Council Chief Executive, Paul Reid*

This evening event in County Hall, Swords, is taking place as part of the public consultation process for the Council's Draft Climate Change Action Plan, which will run from **11 February - 25 March 2019**.

We encourage you to have your say on the Draft Plan during this period. You can **bring along your submission on the day**, talk to us at one of the many stands for details on how to submit, or attend one of our other satellite events in the County (see front page for details).



For more information, visit:
www.dublinclimatechange.ie

OR register via Eventbrite.ie

FINGAL COUNTY COUNCIL'S #COUNCILS4CLIMATEACTION PUBLIC INFORMATION EVENTS

MONDAY 18 FEBRUARY, 5.30-8.30PM
County Hall, Main Street, Swords, Dublin 2

SUPPLEMENTARY INFORMATION EVENTS

WEDNESDAY 20 FEBRUARY, 5.30-8.30PM
Bracken Court Hotel, Bridge Street, Balbriggan

MONDAY 25 FEBRUARY, 5.30-8.30PM
Crowne Plaza Dublin, Blanchardstown Town Centre

THURSDAY 28 FEBRUARY, 5.30-8.30PM
Marine Hotel, 13 Sutton Cross, Burrow, Sutton



AS PART OF THE PUBLIC CONSULTATION FOR FINGAL COUNTY COUNCIL'S
DRAFT CLIMATE CHANGE ACTION PLAN, JOIN US IN SWORDS FOR:

- Fingal County Council's work on climate action
- Practical demos in a range of areas
- Bring the family - Kids' Corner
- Information on how to make a submission on the plan
- Free giveaways and much, much more...

[VISIT CODEMAJIE](#)
[HOME](#)
[ABOUT](#)
[ACTION PLANS](#)
[SUCCESS STORIES](#)
[NEWS](#)
[CONTACT](#)
[MAKE A SUBMISSION](#)

CLIMATE CHANGE ACTION FOR DUBLIN

Aculis nunc gravida, bibendum massa sit amet, faucibus odio donec id in consequat nibh mi, non ullamcorper arcu ultricies ut non ullamcorper arcu ultricies ut.

[VIEW ACTION PLANS](#)
[ABOUT ACTION PLANS](#)

INTRODUCING THE DRAFT CLIMATE CHANGE ACTION PLANS

Each Dublin local authority has produced a detailed strategic plan and a set of specific actions under that. Visit your own local authority page to download relevant reports and view latest actions.

DUBLIN CITY COUNCIL

In consequat nibh mi, non ullamcorper arcu ultricies ut non ullamcorper arcu ultricies ut.

[FIND OUT MORE](#)

DŪN LAOGHAIRE-RATHDOWN COUNTY COUNCIL

In consequat nibh mi, non ullamcorper arcu ultricies ut non ullamcorper arcu ultricies ut.

[FIND OUT MORE](#)

FINGAL COUNTY COUNCIL

In consequat nibh mi, non ullamcorper arcu ultricies ut non ullamcorper arcu ultricies ut.

[FIND OUT MORE](#)

SOUTH DUBLIN COUNTY COUNCIL

In consequat nibh mi, non ullamcorper arcu ultricies ut non ullamcorper arcu ultricies ut.

[FIND OUT MORE](#)

HAVE YOUR SAY!

During the consultation period, submissions are encouraged from individuals, corporations and interest groups. [Submit](#) on the overall plan or on specific plans.

[MAKE A SUBMISSION](#)

Appendix C - Newspaper Notice

Comhairle Contae Fhine Gall

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

Notice is hereby given, that Fingal County Council has prepared a Draft Climate Change Action Plan 2019-2024.

The **Draft Climate Change Action Plan** (CCAP) sets out how the Council will improve energy efficiency and reduce greenhouse gas emissions in its own buildings and operations, while making the Fingal 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 Fingal County 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 (excluding Bank Holidays)**:

- Fingal County Hall Swords
- Fingal Civic Offices, Grove Road, Blanchardstown.
- All Fingal County Council Libraries.

The documents may also be viewed on the Council's Public Consultation Hub <https://consult.fingal.ie/> and at www.dublinclimatechange.ie.

Public Information Events:

Members of the public and interested groups are invited to attend public information events which will be held during the public consultation period, as follows:

- CCAP Launch, Fingal Co Hall, Swords, Monday 18th February, 17.30 – 20.30 (Family friendly event with ReCreate sustainable activities).

Local Events:

- Balbriggan, Bracken Court Hotel, Wed 20th February 2019, 17.30 – 20.30
- Blanchardstown, Crowne Plaza Hotel, Mon 25th February 2019, 17.30 – 20.30
- Sutton, Marine Hotel, Thur 28th February 2019, 17.30 – 20.30

SEAI will be in attendance at all four events to provide advice and information on home energy efficiency grants and supports, and answer technical questions on home retrofits.

Submissions

Submissions or observations regarding the Fingal County 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://consult.fingal.ie/>

By email to climateaction@fingal.ie

By post / hard copy addressed to:

Climate Action Officer,
Environment Dept.,
Fingal County Council
County Hall,
Swords, Co. Dublin.

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. online submission, **or** email, **or** post / hard copy.

**Gilbert Power
Director of Services
Water Services & Environment Department**

DUBLIN

Council

Paul & Paul Dolan, intend to apply for development at 3 Templeview Row, D13. The development will consist of conversion to a storage room, including change of roof type from hipped roof to a new flat-roofed dormer to rear window to the side of the existing building. Application may be inspected or fee not exceeding the reasonable copy, at the offices of Dublin City Council, Department, Block 4, Ground Floor, Wood Quay, Dublin 8, during its hours (9.00a.m. - 4.30p.m.). A reservation in relation to the fee made in writing to the planning authority of the prescribed fee (€20.00) weeks beginning on the date of receipt of the application, and such reservations will be considered by the authority in making a decision on the application.

NG DUBLIN

Paul & Paul Dolan wish to apply for development at 3 Templeview Row, D13. The development will consist of conversion to a storage room, including change of roof type from hipped roof to a new flat-roofed dormer to rear window to the side of the existing building. Application may be inspected or fee not exceeding the reasonable copy, at the offices of Dublin City Council, Department, Block 4, Ground Floor, Wood Quay, Dublin 8, during its hours (9.00a.m. - 4.30p.m.). A reservation in relation to the fee made in writing to the planning authority of the prescribed fee (€20.00) weeks beginning on the date of receipt of the application, and such reservations will be considered by the authority in making a decision on the application.

BLIN

Planning permission with window at attic level works at 27 St. John's Road, Dublin 8. The planning application was purchased at a fee of €20.00. A copy of the application may be inspected at the offices of Dublin City Council, Department, Block 4, Ground Floor, Wood Quay, Dublin 8, during its hours (9.00a.m. - 4.30p.m.). A reservation in relation to the fee made in writing to the planning authority of the prescribed fee (€20.00) weeks beginning on the date of receipt of the application, and such reservations will be considered by the authority in making a decision on the application.

N

2 no. existing windows to the rear of the house at 27 St. John's Road, Dublin 8. The planning application was purchased at a fee of €20.00. A copy of the application may be inspected at the offices of Dublin City Council, Department, Block 4, Ground Floor, Wood Quay, Dublin 8, during its hours (9.00a.m. - 4.30p.m.). A reservation in relation to the fee made in writing to the planning authority of the prescribed fee (€20.00) weeks beginning on the date of receipt of the application, and such reservations will be considered by the authority in making a decision on the application.

To advertise in the

Education

Health Section

Motors Section

Employment

House & Home



Dublin People
GROUP OF NEWSPAPERS

CONTACT OUR

Sales Team

T: 01 8621611

F: 01 8621625

sales@dublinpeople.com

**LET US
HELP
YOU DRIVE
YOUR
BUSINESS
FORWARD**

www.dublinpeople.com

Comhairle Contae
Fhine Gall
Fingal County
Council

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

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

The Fingal County 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 (excluding Bank Holidays):

- Fingal County Hall Swords
- Fingal Civic Offices, Grove Road, Blanchardstown
- All Fingal County Council Libraries

The documents may also be viewed on the Council's Public Consultation Hub <https://consult.fingal.ie/> and at www.dublinclimatechange.ie

Public Information Events:

Members of the public and interested groups are invited to attend public information events which will be held during the public consultation period, as follows:

- CCAP Launch, Fingal Co Hall, Swords, Monday 18th February, 17.30 - 20.30 (Family friendly event with ReCreate sustainable activities).

Local Events:

- Balbriggan, Bracken Court Hotel, Wed 20th February 2019, 17.30 - 20.30
- Blanchardstown, Crowne Plaza Hotel, Mon 25th February 2019, 17.30 - 20.30
- Sutton, Marine Hotel, Thur 28th February 2019, 17.30 - 20.30

SEA will be in attendance at all four events to provide advice and information on home energy efficiency grants and supports, and answer technical questions on home retrofits.

Submissions

Submissions or observations regarding the Fingal County 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://consult.fingal.ie/>
- By email to climateaction@fingal.ie
- By post / hard copy addressed to:

Climate Action Officer,
Environment Dept.,
Fingal County Council
County Hall, Swords, Co. Dublin.

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. online submission, or email, or post / hard copy.

Gilbert Power

Director of Services

Water Services & Environment Department

NORTHSIDE PEOPLE EAST
13.02.19

NORTHSIDE PEOPLE EAST
13.02.19

PLANNING DUBLIN

Dublin City Council

We, Damien and Suzanne Whelan, intend to apply for Permission for development at No 88 Grattan Lodge, The Hole in the Wall Road, Dublin 13, D13 HD51. The proposed development comprises: Demolition of existing single storey conservatory to rear (south) of existing dwelling, and construction of a single storey extension with part flat and part hipped roof with rooflights to rear (south) of dwelling, single storey porch extension to front (north) of dwelling, 2 new high level windows to side elevation (west) at ground floor, internal alterations, and associated elevation changes, landscaping and site works. The planning application may be inspected, or purchased at a fee not exceeding the reasonable cost of making a copy, at the offices of Dublin City Council during its public opening hours and a submission or observation in relation to the application may be made to the authority in writing on payment of the prescribed fee within the period of 5 weeks beginning on the date of receipt by the authority of the application.

PLANNING DUBLIN

Dublin City Council

We, Joseph and Deirdre Keegan, intend to apply for permission for development at 2 St Assam's Avenue, Raheny, Dublin 5, D05 RD45. The development consists of an attic conversion to a storage room, dormer window and 2 no. rooflights to rear of associated works. The planning application may be inspected, or purchased at a fee not exceeding the reasonable cost of making a copy, at the offices of Dublin City Council during its public opening hours and a submission or observation in relation to the application may be made to the authority in writing on payment of the prescribed fee within the period of 5 weeks beginning on the date of receipt by the authority of the application.

PLANNING DUBLIN

Fingal County Council

We, Jon Paul and Karen Harrington intend to apply for permission for development at the site of Yellow Walls Road, Malahide, Co. Dublin. The development will consist of (a) Partial demolition of existing residential structure to rear of existing house to include new fenestration, construction of a two storey hipped roof extension to the side of the existing residential house, construction of a part one, part two extension to the rear of the existing house, Provision of Velux type rooflights, Replacement of the existing pie, facilitate wider driveway entrance and new gate and (g) all associated works. Planning Application may be inspected, or purchased at a fee not exceeding the reasonable cost of making a copy, at the offices of the Planning Authority during its public opening hours and a submission or observation may be made to the authority in writing on payment of the prescribed fee within the period of 5 weeks beginning on the date of receipt by the authority of the application.

PLANNING D

Dublin City Council

We, Ciaran and Laura Regan, intend to apply for Permission for development at 100 St. John's Road, Beaumont, Dublin 7. The development will consist of 1 no. space for the use as a study to the side providing a new roof dormer window to rear of existing dwelling.

Appendix D - SEA AA Screening Determination

Strategic Environmental Assessment Determination

A Strategic Environmental Assessment (SEA) Screening determination has been made by Fingal County Council regarding actions as recommended by the Chief Executive Report on submissions made on the Draft Fingal 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 2a 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 Fingal CCAP 2019-2023 are identified as sufficiently robust and subject to their full implementation, no likely significant effects on the environment are identified.

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

AA Screening Conclusion & determination

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

Appendix E - Emissions Trading Scheme

Emissions Trading Overview

The EU emissions trading system (EU ETS) is a cornerstone of the European Union's policy to combat climate change and its key tool for reducing industrial greenhouse gas emissions cost-effectively. The first - and still by far the biggest - international system for trading greenhouse gas emission allowances, the EU ETS covers more than 11,000 power stations and industrial plants in 31 countries, as well as airlines. See EU Commission website: https://ec.europa.eu/clima/policies/ets_en

Installations and aircraft operators covered by the EU ETS are those which carry out activities listed in Annex I of the EU ETS Directive.

The EU emissions trading system (EU ETS) was launched in 2005 as the world's first international company-level 'cap-and trade' system for reducing emissions of greenhouse gases cost-effectively. The EU ETS is established under Directive 2003/87/EC and amendments. This is implemented in Ireland under S.I. 490 of 2012 and amendments and S.I. No. 261 of 2010 and amendments. The scheme is being implemented in distinct phases or 'trading periods'.

The legislative framework of the EU ETS was revised in 2018 to enable it to achieve the EU's 2030 emission reduction targets in line with the 2030 climate and energy policy framework and as part of the EU's contribution to the 2015 Paris Agreement

The revised EU ETS Directive (Directive (EU) 2018/410) entered into force on 8 April 2018.

How does Emissions Trading work?

Emissions' trading is a market-based system to reduce the emissions of climate-damaging greenhouse gases. It is based on the principle of a 'Cap and Trade' system: The cap makes sure that CO₂ becomes a product and, thus, CO₂ is valued at a price, which is determined by the supply and demand at the (trading) market.

To the installations, which have to be part of emissions trading scheme according to the legislation, a defined number of emission allowances (from the cap) are allocated. The allocation rules are defined Europe-wide. One emission allowance equals one tonne of CO₂.

Once a year, each installation has to surrender enough allowances to cover all its emissions. If a company reduces its emissions so that it has more allowances than it needs, it can sell the remaining (not needed) allowances at the market. Alternatively, it has to purchase additional allowances to comply with its surrender obligation. If a company does not fulfil its obligations to surrender allowances in line with their verified emissions / tonnes of CO₂, heavy penalties will apply.

Those facing difficulty in remaining within their allowance limit have a choice between several options:

They can take measures to reduce their emissions (such as investing in more efficient technology or using a less carbon intensive energy source),

They can buy extra allowances and/or CDM/JI credits on the market (the EU ETS links to emission reduction opportunities in the rest of the world by accepting credits from emission-saving projects

carried out under the Kyoto Protocol's Clean Development Mechanism (CDM) and Joint Implementation instrument (JI)) OR

They can use a combination of the two.

This flexibility ensures that emissions are reduced in the most cost-effective way.

Appendix F - Greater Dublin Area Transport Strategy 2016 – 2035

The Transport Strategy for the Greater Dublin Area 2016 – 2035 provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA) over the next two decades. It also provides a transport planning policy around which other agencies involved in land use planning, environmental protection, and delivery of other infrastructure such as housing, water and power, can align their investment priorities. It is, therefore, an essential component, along with investment programmes in other sectors, for the orderly development of the Greater Dublin Area over the next 20 years. See NTA website: https://www.nationaltransport.ie/wp-content/uploads/2016/08/Transport_Strategy_for_the_Greater_Dublin_Area_2016-2035.pdf