



THE EXECUTIVE'S REPORT ON
SUBMISSIONS RECEIVED

DÚN LAOGHAIRE-RATHDOWN COUNTY COUNCIL
**DRAFT CLIMATE CHANGE
ACTION PLAN 2019-2024**

MAY 2019

Contents

Item	Page Number
0.1 Introduction	3
0.1.1 Purpose of the Report	3
0.1.2 Background	3
0.1.3 Public Consultation	4
0.2 Details of the Public Consultation Process	5
0.2.1 Objectives of the Public Consultation Process	5
0.2.2 Outline of Public Consultation Process	5
0.2.3 How did you hear about the Public Consultation	6
0.2.4 Public Information Drop-In Events	6
0.3 Details of the Submissions	7
0.3.1 Introduction	7
0.3.2 List of Persons, Organisations and Bodies who made Submissions	7
0.4 The Executive's Responses	8
0.4.1 Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)	8
0.4.2 Structure of the Report	8
0.5 The Executive's proposed amendments to the draft Plan under each heading	8
0.5.1 Executive Summary	8
0.5.2 Introduction	9
0.5.3 Milestone 1: Initiate	10
0.5.4 Milestone 2: Research	10
0.5.5 Milestone 3: Plan	13
0.5.6 Action area: Energy & Buildings	14
0.5.7 Action area: Transport	15
0.5.8 Action area: Flood Resilience	16
0.5.9 Action area: Nature Based Solutions	19
0.5.10 Action area: Resource Management	20
0.5.11 Milestone 4: Implementation	21
0.5.12 Milestone 5: Monitoring & Iteration	22
0.5.13 Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)	23
0.6 Conclusions	38
Appendix A: List of Persons, Organisations and Bodies who made Submissions	
Appendix B: Executive's responses to National, Regional and non- Local Authority items	
Appendix C.1 – C.13 The Executive's responses to submissions on each section of the plan	
Appendix D: SEA Screening Determination	
Appendix E: AA Screening Determination	

0.1 Introduction

0.1.1 Purpose of the Report

Under the National Adaptation Framework, adaptation plans are required to be prepared and submitted to the Government for approval, by 30th September 2019 from a number of Government and Public sectors including Local Authorities.

In response to this, Dún Laoghaire Rathdown County Council has prepared a Draft Climate Change Action Plan 2019-2024 which includes both adaptation and mitigation measures. 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 Dún Laoghaire Rathdown County Council area more adaptive to the impacts of climate change. The Draft Plan includes a range of actions across five key action areas, Energy & Buildings, Transport, Flood Resilience, Nature Based Solutions and Resource Management.

The Council undertook public consultation from Monday 11th February to Monday 25th March 2019. A total of 136 valid submissions were received.

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

- Proposed changes and amendments to the draft Plan following the Public consultation.
- lists the persons or bodies who made submissions or observations on the Draft Climate Change Action Plan;
- Summarises in the attached appendices the issues raised by the persons or bodies in the submissions or observations; and gives the response and recommendation of the Executive to the issues raised.
- Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) reports.

This Executive's Report on the Draft Climate Change Action Plan Public Consultation is hereby submitted to the members of Dún Laoghaire Rathdown County Council for consideration and approval.

0.1.2 Background

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

In the Dublin Metropolitan Region, the four Dublin Draft Climate Change Action Plans have been prepared in partnership with the Climate Action Regional Office (CARO) Codema (Dublin's Energy Agency), following extensive and ongoing engagement with Dún Laoghaire Rathdown County Council, the Council's SPC's and the other Dublin local authorities, throughout 2017/2018. The Draft Climate Change Action Plans address both climate change mitigation and adaptation. This is a result of the following: the Dublin local authorities are signatories to the EU Covenant of Mayors for

Climate & Energy, which address both climate change adaptation and mitigation, and the significant experience of Codema in developing mitigation baseline emission inventories and the completion of a Spatial Energy Demand Analysis for the four Dublin local authorities and related mapping outputs.

0.1.3 Public Consultation

Public consultation on the Draft Climate Change Action Plan took place over a six-week period from Monday 11th February to Monday 25th March 2019, with 136 valid submissions received in total.

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

0.2 Details of the Public Consultation Process

0.2.1 Objectives of the Public Consultation Process

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

- Increase awareness of the Draft Climate Change Action Plan for the general public, various stakeholders, prescribed bodies, and Council staff;
- Provide opportunities for more creative and dynamic engagement with a variety of interested parties, including younger citizens, older citizens and locally based community and 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.

0.2.2 Outline of Public Consultation Process

The Council has used a variety of online and supporting 'face to face' methods, to consult and engage with the citizens of Dún Laoghaire Rathdown County and a range of other stakeholders and interested parties.

- A Newspaper Notice appeared in the Irish Times on Monday 11th February 2019.
- 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.

0.2.3 Public Information Drop-In Events

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

- Public Information Sessions were held in the Parish Hall, Holy Cross Church, Dundrum on 13th Thursday 2019 and on the, 21st February 2019 in the National Maritime Museum, in Dún Laoghaire 21st February 2019.
- 211 attendees approximately.
- External stakeholders included: SEAI (Energy), GoCar, BleeperBike, Renault (Transport) and Stop Food Waste / EPA Mater Composters (Resource Management).



0.3 Details of the Submissions

0.3.1 Introduction

A total of 136 valid submissions were received, the breakdown of submissions is as follows:

Table 0.3.1: Overview of Submissions

Online Portal Submissions	58
Email Submissions	76
Posted / Handed Submissions	2
Total Submissions	136

All submissions were read, analysed and summarised. A list of the persons, organisations and bodies that made submissions is provided in Appendix A.

Appendix B sets out the Executive's response to National, Regional and non - Local Authority items raised in submissions for the Draft Climate Change Action Plans for the Dublin Local authorities. The responses were prepared in conjunction with the other Dublin Local Authorities, the CARO office and Codema.

Appendix C1 to C13 sets out the Executive's response to issues raised of a local nature.

Appendix D and E includes the SEA Screening Determination and AA Screening Determination. Again the replies follow the format of the draft plan.

The categorisations and summary of issues raised, together with the Executive's response and recommendations is contained in Section 0.5 onwards. **NB:** The headings relating to the categorisation and summary of issues raised, together with the Executive's response and recommendations, follows that of the headings of the Draft Climate Change Action Plan document i.e. Section 0.5.1 Executive Summary, Section 0.5.2 Introduction, and so forth.

0.3.2 List of Persons, Organisations and Bodies who made Submissions

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

0.4 The Executive's Responses

The Executive has prepared a response and recommendation under the relevant Sections of the Draft Climate Change Action Plan. The listing and format of the proposed changes and responses to issues raised, follows the document structure of the Draft Climate Change Action Plan.

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

A Strategic Environmental Assessment (SEA) Environmental Report and an Appropriate Assessment (AA) Natura Impact Statement, accompanied the public display of the Draft Climate Change Action Plan. The 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 Executive's recommendations have been screened for the purposes of SEA and AA. Where no amendments to the Draft Plan are proposed, these recommendations have also been screened for the purposes of SEA and AA.

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

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

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

0.4.2 Structure of the Report

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

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

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

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

0.5. Summary of The Executive's Proposed Amendments to the Draft Climate Change Action Plan are listed in the next sections and follow the format of the Draft Climate Change Action Plan

0.5.1 Executive Summary section of the Plan:

The Executive's Recommendation

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

0.5.2 Introduction Section of the Draft CCAP

The Executive's Recommendation

It is recommended that the following amendments be made to this section of the Draft CCAP as follows

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

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

SEA Comment

This recommendation relates to additional text to provide context and consistency. Therefore positive interactions with SEOS particularly Climate change. No significant adverse environmental effects are identified for this CE recommendation.

Appropriate Assessment Comment:

This recommendation relates to additional text to provide context and consistency with other climate change plans. The inclusion of this text will not result in land use effects that will have implications for European Sites and will not have the potential to result in significant effects to European Sites.

The 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.”

SEA Comment

The additional text again provides for greater consistency with sectoral climate change adaptation plans. Therefore, positive interactions in relation to Climate Change SEOS and no significant adverse environmental effects are identified for this CE recommendation.

Appropriate Assessment Comment:

The additional text provides for greater consistency with sectoral climate change adaptation plans. Screening for Appropriate Assessment of the sectoral plans will be completed and during this assessment the potential for these sectoral plans to combine with the CCAP will be examined

0.5.3 Executive Summary section of the Plan:

The Executive’s Recommendation

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

0.5.4 Milestone 2: Research

The Executive’s Recommendation

It is recommended that the following amendments be made to this section of 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.

SEA Comment

This text provides for greater support and engagement under the public awareness section. Positive interactions with Population and Human Health and Climate change SEOS are identified for this CE recommendation and no adverse environmental effects.

Appropriate Assessment Comment:

This text provides for greater support and engagement under the public awareness section. The inclusion of this text will not result in land use effects and will not have the potential to result in likely significant effects to European Sites

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.

SEA Comment

As above, this text provides greater context and support for public awareness and engagement. Positive interactions with Population and Human Health and Climate Change SEOS and no significant adverse effects are identified for this CE recommendation.

Appropriate Assessment Comment

This text provides for greater support and engagement under the public awareness section. The inclusion of this text will not result in land use effects and will not have the potential to result in likely significant effects to European Sites

The 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 continue to 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.”

SEA Comment

This text provides greater context and support for public awareness and engagement and role of business community in addressing climate change. Positive interactions with Population and Human Health and Climate Change SEOS and no significant adverse effects are identified for this CE recommendation.

Appropriate Assessment Comment

This text sets out the potential leadership role the business community can play in addressing climate change and positions the CCAP to support the business community in delivering actions to address climate change. No specific land use measures are outlined in this text and its inclusion in the plan will not in itself have the potential to result in likely significant effects to European Sites .

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.

Insert in Mitigation Baseline on page 45 1st paragraph line 9

The energy database also shows that DLRCC improved its energy performance by 28.2% between the baseline year (2009) and 2017.

0.5.5 Milestone 3: Plan

The Executive's Recommendation

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

0.5.6. Energy and Buildings

The Executive's Recommendations

It is recommended that the following amendments be made to this section of the Draft CCAP as follows

Additional text to be inserted in the Draft CCAP, as follows:

Archaeological heritage includes buildings, field monuments, sites, landscapes, and harbours, the survival of which, not only provide a physical narrative of our past but tourism, recreational and educational opportunities. The very nature of these sites means many are situated in areas that are inherently susceptible to climate change impacts i.e. close to rivers, coasts, islands etc. There are approximately 438 recorded archaeological sites and monuments within DLR in private and public ownership that may be subject to a combination and interaction of impacts of climate change. It is essential that the vulnerability of the archaeological resource is understood, recognised and integrated into the adaptive policies and action process.

In relation to the built or architectural heritage of DLR the county has a diverse historic building stock ranging from modest domestic architecture, to Georgian and Victorian houses, churches and public buildings, to piers, slipways and bridges. Architectural heritage protections include individual properties known as Protected Structures and area based designations known as Architectural Conservation Areas. There are approximately 2,058 Protected Structures in DLR and 26 Architectural Conservation Areas. DLR has an extensive coastal architectural heritage contained within its coastal towns and also on individual coastal sites which would be sensitive to any climate change impacts on sea levels. Additionally, the construction materials and methods used in historic buildings across the whole county can easily be damaged by insensitive and inappropriate interventions. These structures were generally built from locally sourced breathable materials (thatch, mud, lime, stone, brick, slate etc.) and so any energy efficiency upgrades need to be carefully considered and informed to ensure they do not cause damage to or remove the historic building fabric and features. Local Authorities have a role in protecting and maintaining the archaeological and architectural resource for future generations. Climate Change

actions should be carried out in consultation with LA Architectural Conservation Officers, Heritage Officers and other relevant stakeholders.

Additional text to be inserted in Energy & Building Section as part of or after ENERGY EFFICIENCY AND RENEWABLES ON PAGE 55, as follows:

Proposals to improve the thermal performance of or insert renewable energy technologies into historic buildings need to be sensitive to traditional methods of construction to ensure that the proposed works are appropriate and do not actually cause damage to the structure, require the removal of historic fabric such as original windows, doors and floors, or have a detrimental visual impact. The materials used traditionally allowed for moisture to be absorbed and released easily, for the building to “breathe” and so the ventilation of the internal spaces performs an important function. Interventions that may be appropriate to a building of modern construction methods and materials, such as impermeable building products or air-tight spaces, could have unintended harmful consequences for historic and traditional buildings. Other solutions such as external cladding, internal wall linings, or replacement of windows and doors may be inappropriate as they would obscure or remove significant features. The location and use of solar panels, wind turbines, or other renewable technologies and their associated plant and cables must be carefully considered for the historic environment.

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

Additional action in ENERGY EFFICIENCY & RENEWABLES p58

New Action no 19: *Energy audit of council owned historic buildings and develop a programme of works to improve energy efficiency while ensuring measures do not compromise the character of the building.*

Lead Department: *Establish working group within the Council to include representatives from the Energy Team and all Departments with responsibilities in relation to Historic buildings.*

Timeline/Budget: 2019/ONGOING

SEA comment:

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

AA Comment:

The carrying out of an energy audit of historic buildings will not result in land use effects. This action will not, by itself or in combination with other plans or projects, have the potential to result in likely significant effects to European Sites.

The improvement of the energy efficiency of historic buildings within the plan area will not have the potential to result in negative effects to European Sites occurring within the zone of influence of the plan. Historic buildings are not representative of any Annex I habitat that are listed as qualifying features of interest of European Sites and do not provide habitat for any qualifying species that are listed as qualifying features of interest of European Sites. Improvements in energy efficiency to such buildings will not have the potential to result in land use effect that could in result in likely significant effects to the qualifying features of interest of European Sites. This action will not, by itself or in combination with other plans or projects, have the potential to result in likely significant effects to European Sites

0.5.7 Transport

The Executive's Recommendation

It is recommended that the following amendments be made to this section of the Draft CCAP as follows

INSERT NEW ACTION after T7 under Active Travel & Behavioural Change Section in Transport Action Area, as follows:

T8 Support the Greater Dublin Cycling Network Plan

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

The Executive's Recommendation

Recommendation Add the following text Operations on Page 62.

The Council will also explore the replacement of fleet vehicles with other lower emissions alternatives

The Executive's Recommendation

AMEND ACTION 2 on page 66

Amend Action 2 with new text; 'Reduce parking to provide for sustainable travel alternatives'

SEA Comment

T8: Positive interactions directly and indirectly in relation to the new Action Support the Greater Dublin Cycling Network Plan. These relate to population and human health, material assets that encourage a modal shift, climate change and air quality SEOS. The Greater Dublin Cycling Network Plan has been subject to SEA and AA and providing all measures outlined in the SEA and AA of this

plan, as well as the measures in the DLR CCAP SEA and AA are implemented, significant adverse effects are not identified.

Pg 62 additional text: does not in and of itself give rise to land use effects, no interactions with SEOs at this juncture

Action 2: Positive interactions with SEOS relating to behavioural change and modal shifts in transport, SEOS in particular are material assets, climate change and air quality and population and human health.

Appropriate Assessment Comment

T8: The NIS of the draft CCAP identified actions providing for the development of walking and cycling networks within the Plan area as having the potential to result in likely significant effects to European Sites. The NIS provides for a range of mitigation measures that will minimise the environmental impact of such walking and cycling infrastructure and will eliminate the potential for adverse impacts to European Sites. Provided all mitigation measures as outlined in the NIS of the draft CCAP are implemented, the inclusion of this additional action will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.

Noted, this provides additional text rather than a new or amended action. Exploration of fleet vehicles with lower emissions alternatives will have the potential to result in positive environmental impacts for air quality and climate. It will not have the potential to result in impact that could, alone or in-combination with other plans or projects significantly effect European Sites.

Amend Action 2: A reduction in the provision in parking within the plan are will not have the potential to result in land use effects that could, alone or in combination with other plans or projects, result in significant effects to European Sites.

0.5.8 Actions on Flood Resilience The Executive's Recommendations

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

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

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

SEA Comment

Additional text only; no interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

Appropriate Assessment Comment

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

On Page 72 action 3 amend to read

Prepare and Implement an Integrated Coastal Zone Management Plan that addresses natural and cultural heritage and follows the Marine Spatial Planning Directive/framework

SEA Comment

This action was previously assessed at draft plan stage and the above mitigation measure was recommended through the SEA and AA of the draft CCAP for inclusion.

Appropriate Assessment Comment

This action was previously assessed at draft plan stage and the above mitigation measure was recommended through the SEA and AA of the draft CCAP for inclusion.

On Page 72 action 7 amend to read

Develop template to capture impacts, response and costs (**including ecosystem services/natural capital costs**) for all major climate events

SEA Comment

This action was previously assessed at draft plan stage and the above mitigation measure was recommended through the SEA and AA of the draft CCAP for inclusion.

Appropriate Assessment Comment

This action was previously assessed at draft plan stage and the above mitigation measure was recommended through the SEA and AA of the draft CCAP for inclusion.

On Page 72 action 10 amend to read

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**

SEA Comment

This action was previously assessed at draft plan stage and the above mitigation measure was recommended through the SEA and AA of the draft CCAP for inclusion.

Appropriate Assessment Comment

This action was previously assessed at draft plan stage and the above mitigation measure was recommended through the SEA and AA of the draft CCAP for inclusion.

Add the following text to page 72

The following flood storage actions will incorporate nature based solutions and biodiversity enhancement measures where possible. (Refers to actions 11 to 18)

SEA Comment

This action was previously assessed at draft plan stage and the above mitigation measure was recommended through the SEA and AA of the draft CCAP for inclusion.

Appropriate Assessment Comment

This action was previously assessed at draft plan stage and the above mitigation measure was recommended through the SEA and AA of the draft CCAP for inclusion.

SEA Comment

The Executive's Recommendation:

It is recommended that a new action be included in the CCAP flood resilience after action 3 .
Proposed text and actions included below.

New Action: **The Local Authority and CARO will work with the Geological Survey of Ireland in the areas of urban geology and coastal vulnerability.**

Lead Department: **CARO and Municipal Services**

Timeline: **ongoing**

SEA Comment

Positive indirect effects associated with better understanding and collaboration in relation to urban geology and coastal vulnerability. Positive interactions with soil and geology, water, biodiversity and climate change SEOs.

Appropriate Assessment Comment

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

It is recommended the following action be added

Communication and awareness campaigns on flood risk management and natural flood management measures to be included in CARO and Local Authority Public awareness initiatives.

SEA Comment

Awareness raising gives rise to positive interactions for Population and climate change SEOS in particular.

Appropriate Assessment Comment

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

0.5.9 Actions on Nature Based Solutions

It is recommended that the following amendments be made to this section of the Draft CCAP as follows

Nature Based Solutions	
Action 35	Map dlr wildlife corridors across the county and evaluate their ecosystem services including climate change resilience and how this can be protected and enhanced.
Action 36	Improve climate change resilience across the dlr by changing our landscape management of Green Infrastructure including green spaces, roadside verges and streamsides to create nature wildlife and pollinator areas within dlr. Extend our Slow to Mow campaign to reach all parts of the county.
Action 37	Increase awareness of the benefits of biodiversity and ecosystem services to climate change resilience.

SEA Comment:

For all three new actions, positive interactions in relation to biodiversity, water, soil, landscape, population, climate and air quality.

AA Comment:

Action 35: This mapping exercise will not result in land use effects that could, alone or in combination with other plans or projects, result in significant effects to European Sites. The implementation of this action will have the potential to result in positive impacts for biodiversity in the plan area by provide a comprehensive baseline biodiversity dataset that could be used to inform future land use activities.

Action 36: This action will have the potential to result in positive impacts to biodiversity in general and where targeted within or adjacent to European Sites have the potential to result in positive impacts for the conservation objectives of these designated sites. Its implementation will not, alone or in combination with other plans or projects, have the potential to result in likely significant negative effects to European Sites.

Action 37: This action will not in itself result in land use impacts that could, alone or in-combination with other plans or projects significantly effect European Sites.

0.5.10 Actions on Resource Management

The Executive's Recommendations

It is recommended that the following amendments be made to this section of the Draft CCAP as follows

Amend action 14 on page 86 to add 'including the promotion of free WEEE and battery recycling'

SEA Comment

Positive interactions for material assets in particular.

Appropriate Assessment Comment:

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

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.

SEA Comment

SEA Comment

Positive direct interactions particularly in relation to material assets and climate change SEOs. No significant environmental effects are identified for this CE recommendation.

Appropriate Assessment Comment:

This action will not have the potential alone, or in combination with other plans or projects to result in likely significant effects to European Sites.

0.5.11 Milestone 4: Implementation:

The Executive's Recommendation

It is recommended that the following amendments be made to this section of the Draft CCAP as follows

REPLACE the following text on Page 88 of the Draft CCAP “ *Codema, Dublin's Energy agency, is continuing to provide support to many individual actions in the areas of research, planning, technical assistance, cost benefit analysis, procurement, project management, funding applications and communications*”

with the following NEW TEXT:-

“DLR 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.”

SEA Comment

This additional text provides greater context and links with potential funding streams and collaboration. No significant environmental effects are identified for this CE recommendation.

Appropriate Assessment Comment:

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

0.5.12 Milestone 5: Monitoring & Iteration:

It is recommended that the following amendments be made to this section of the Draft CCAP as follows

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

DLR, 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, DLRCC 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. DLRCC'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.**

SEA Comment

This additional text provides greater detail on existing commitments including the Dublin Region Energy Masterplan which has been assessed through the SEA and AA process to date. No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.

Appropriate Assessment Comment:

This additional text provides greater detail on existing commitments including the Dublin Region Energy Masterplan which has been assessed through the SEA and AA process to date. The inclusion of this text will not result in land use effects that will have the potential to result in likely significant effects to European Sites.

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

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

	Submissions on the Environmental Report	SEA and AA Response
		<p>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.</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 Executives Report have been screened for SEA and AA to ascertain if likely significant environmental effects or significant effects on European sites would arise.</p> <p>Both processes have identified additional mitigation measures for</p>

	Submissions on the Environmental Report	SEA and AA Response
		the CCAP and the SEA has also provided for a monitoring regime, which is included within this CCAP All mitigation measures identified for the CCAP through the SEA and AA process will be adhered to and implemented over the course of the plan.
	<p>Assessment of Alternatives</p> <p>We welcome that the EPA ‘Developing and Assessing Alternatives in Strategic Environmental Assessment’ (2015) guidance document has been considered in preparing and assessing alternatives. We also note the alternatives considered in the SEA, and the selection of the preferred alternative</p>	Noted.
	<p>Additional Plan Considerations</p> <p>Irish Water’s Draft National Water Resources Plan should be useful to refer to, in terms of ensuring security of drinking water supply within the Plan area, is also considered. This plan includes consideration of climate change impacts. Aligning adequate and appropriate critical service infrastructure and population / economic growth of the Dublin region is essential.</p>	<p>Noted and agreed.</p> <p>Chapters 4 and 7 of the SEA ER will be expanded in the material assets section to discuss this.</p> <p>Chapter 3 will include reference to the Draft National Water Resources Plan</p>
	<p>The link between the Plan and the sectoral adaptation plans could also be expanded on. This would clarify the alignment between the plan and other higher level sectoral plan.</p>	<p>Noted and agreed.</p> <p>Chapter 3 of the SEA ER will expand upon this and the links to other high level sectoral plans where appropriate</p>
	<p>Mitigation Measures</p>	
	<p>We acknowledge the SEA recommendations, to improve the Plan in terms of integrating wider environmental considerations into the Plan. We note the recommendation to prepare and implement a coastal zone management plan for Dublin Bay. This should be prepared in collaboration with relevant stakeholders and consider the requirements of the SEA and Habitats Directives, as appropriate.</p>	<p>Noted, during the preparation of such a plan, the existing mitigation measures of the DLR CDP will apply as listed and presented in Chapter 8 of the SEA ER.</p>

	Submissions on the Environmental Report	SEA and AA Response
	In relation to the application of strategic urban drainage systems as part of flood risk management actions described, these should be supported by relevant monitoring and maintenance also to ensure they operate effectively over the lifetime of the Plan.	Noted. Noted and agreed. All DLRCC installed SUDS measures will be maintained and monitored
	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.
	<p>Monitoring</p> <p>The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and address the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. We welcome that the proposed SEA monitoring programme sets out the various data sources, monitoring frequencies and responsibilities. We recommend that the SEA Monitoring of environmental receptors, as set out in Table 12 (Chapter 9 - Monitoring) of the SEA, is incorporated into the Plan review to monitor how effectively environmental considerations are being implemented.</p>	<p>SEA recommends inclusion of the Monitoring Table in the final Plan.</p> <p>The introduction to Chapter 9 monitoring of the SEA ER highlights additional monitoring in the event of unforeseen and cumulative effects arising.</p>
	Where possible, additional information on monitoring and indicators of the transition should be considered to ensure that resources continue to be appropriately directed and to help avoid unintended secondary adverse impacts	Noted, Given that the SEA monitoring table will provide environmental monitoring of the CCAP as well as annual monitoring of the CCAP, it is considered sufficient at this point to capture the transition based on annual monitoring of the action plan, supported by SEA monitoring.

	Submissions on the Environmental Report	SEA and AA Response
	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, DLR 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 be premature in light of forthcoming Final Eastern Midland and Regional Spatial and Economic Strategy and upcoming Whole of Government Climate</p>

	Submissions on the Environmental Report	SEA and AA Response
		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
	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	Noted- Soil Sealing study is included in the Dublin City CCAP (Action 38), and consideration will be given to extending this to a regional assessment

	Submissions on the Environmental Report	SEA and AA Response
	example, an analysis of soil sealing could be done to determine levels of permeability in the Greater Dublin Area. We recommend using the GSI's Quaternary subsoil map and geotechnical database for this task.	
	<p>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		
	5.0 Biodiversity Adaptation to Climate Change Ireland's draft Biodiversity Sectoral Climate Change Adaptation Plan ⁸ which is subject	Noted, the SEA ER Chapter Three will reference the draft Biodiversity

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

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

	Submissions on the Environmental Report	SEA and AA Response
	<p>playing pitches including those of school grounds to forage when eel grass supplies have reduced at coastal sites. These areas are hugely important within a climate change adaptation scenario for Brent in the future and need to be secured.</p> <p>7.0 Breeding river birds Dublin's rivers and associated habitats are known to contain breeding Annex 1 Kingfisher, Dipper, Grey Wagtail, and Sand Martin. In order to protect nest sites and to provide adaptation solutions under a changing climate but also within the context of any flood mitigation measures, BirdWatch Ireland recommends that further survey work is undertaken to determine where these birds are breeding so as to conserve and improve breeding sites and also to prepare an evidence-based report on appropriate adaptation measures for these important species. Ensuring that river ecosystems are healthy and support fish and insect populations stocks is also critical as these are food sources for these bird species.</p> <p>8.0 Breeding Swifts 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: The material amendments and reopening of the RSES is noted, and its status will be assessed as part of the updating to the draft CCAP, NIS and SEA ER.</p> <p>The Mitigation Actions within the NIS will be incorporated into the final plan.</p>

	Submissions on the Environmental Report	SEA and AA Response
	<p>9.2 There is no mention of the requirements of Article 4(4) of the Birds Directive the second sentence of which states ‘Outside these protection areas, Member States shall also strive to avoid pollution or deterioration of habitats’. This is reaffirmed in Article 27 (4)(b) the European Communities Birds and Habitats Regulations (2011). In 2007 the European Court of Justice ruled against Ireland in C-418/0411 ‘The Birds Case’ for various breaches of the Birds and Habitats Directives including on Article 4 (4) which are still being addressed by the State(see Programme of Measures to comply with the ECJ Ruling)12.</p> <p>There is no reference to the requirement that local authorities must strive to avoid the deterioration of the habitats of Annex 1 bird species found outside of European sites. In addition, it is important to recall that the Birds Directive also calls for protection of birds in the wider countryside (outside of SPAs) and this is detailed further in the NPWS Programme of Measures to address compliance issues in C-418/04.</p> <p>All efforts must be made to enforce the regulations to support birds in the wider countryside.</p>	Noted, this will be included in the SEA ER and the NIS.
	<p>9.3 BirdWatch Ireland would like clarification on the statement in the NIR that there will be no significant adverse effects on the European sites when it is unclear whether the suggestions in Table 7.2 will be incorporated into the final plan. The suggested text is NOT in the draft climate action plan submitted for consultation. We would appreciate clarification of this.</p>	Noted, for clarification the mitigation measures in Table 7.2 will be included in the final plan.
Patrick Molloy, Coppinger Wood		
1	<p>Sewage and waste water management: Indicators are that in the not too distant future clean, potable drinking water will not be so readily available. Currently rain water run off joins and mixes with sewage on its way to the sewage treatment plant at Salthill by the West Pier at Dun Laoghaire Harbour, where the combined foul water is treated. The lack of foresight and appropriate investment in infrastructure to manage the run off rainwater and sewage separately to each other, gives cause during heavy and/or prolonged rain for the combined volume of foul water to overcome the capacity of the Sewage treatment plant. This in turn necessitates the opening of an overflow and</p>	<p>Comments relating to rainwater, potable and foul water are noted. The potential effects of climate change on material assets including water services are addressed in the SEA ER and NIS. Additional analysis will be provided in light of the Irish Water Draft National Water Resources Plan.</p>

	Submissions on the Environmental Report	SEA and AA Response
	<p>pumping the sewage/foul water out into the sea waters of the Dublin Bay Biosphere, just to the west of the west pier. This practice is unsustainable</p> <ol style="list-style-type: none"> 1. Polluting Dublin Bay South, the beaches, bathing waters and contributing to a health hazardous environment for living things including the estimated 300,000 humans living within the Biosphere area. 2. Not keeping rain water runoff separate from sewage and harvesting and treating the rain water runoff to make it potable water. <p>A further thought in the advent of rising sea levels, is there a case to be made to increase the height above sea level of the sewage treatment plant or build a levee wall around it?</p> <p>Biodiversity: As reported recently, Ireland is losing its insect population at a rate of 2.5% per annum. At this rate they will be well on the road to extinct by 2060. See Kevin O’Sullivan’s article in the Irish Times Saturday 16th February 2019 Bee friendly planting of pro-pollinator flora I commend the Council on its programme of “Nature Wildlife Area, Do not cut or spray” areas in residential areas and suggest that Council and Councillors encourage residence associations to set aside areas for a Nature Wildlife Area. I would also ask DLRCoCo to extend the season of designated Bulb Planting areas to include time for wild flower and grasses to mature before cutting in the late Autumn</p>	<p>Potential effects on European Sites within the zone of influence of the DLR CCAP are considered in the NIS.</p> <p>This proposal is noted. Amendments to Action 35 in Nature Based Solutions is recommended for amended to extend the Slow to Mow campaign and wildlife and pollinator areas.</p>
Diarmuid McAree PPN Member of DLRCC SPC on Environment and Climate Change	Check to ensure proper compliance with all EU Directives and National Legislation	Noted.
Michelle	One Tree Per Child’ wants to have every child planting one tree as part of a primary	Noted

	Submissions on the Environmental Report	SEA and AA Response
Ritchie	<p>school activity. This is a global initiative that I hope could be part of the Nature-Based-Solutions section of the Draft Climate Change Action Plan. The aim is to get millions of children planting millions of trees.</p> <p>"As the council will have identified the appropriate land, they will complete the Strategic Environmental Assessment (SEA) and / or Appropriate Assessment (AA) .</p> <p>According to Coilte :www.coillte.ie/our-forests/public-goods/climate-change/ ""Forests help reduce climate change effects by reducing the amount of greenhouse gases in the atmosphere. Carbon dioxide is the main greenhouse gas responsible for climate change and emissions of it from man-made sources have been increasing year on year since the 1950s. Trees absorb carbon dioxide from the atmosphere for growth, convert it to sugars and wood and release pure oxygen back to the atmosphere. In Ireland, young forests grow quickly and absorb large amounts of carbon dioxide""."</p>	

RECOMMENDED MITIGATION MEASURES FOR THE DUN LAOGHAIRE RATHDOWN CCAP – REVISED

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

Overarching measure	An integrated approach to decision making in relation to these climate change actions is recommended.
Flood Resilience	Recommended text in green
	Prepare and Implement an Integrated Coastal Zone Management Plan that addresses natural and cultural heritage and follows the Marine Spatial Planning Directive/framework
	Develop template to capture impacts, response and costs (including consideration of ecosystem services/natural capital costs) for all major climate events.
	Update DLA urban drainage and flooding policies for current knowledge of flood risk and the latest best practice in drainage design promoting natural flood measures as a priority .
New text before Actions 11- 18 in Flood Resilience	The following flood storage actions will incorporate nature based solutions and biodiversity enhancement measures where possible. (Refers to Actions 11 to 18).

Section	
New measures to be consistent with neighbouring Local Authorities	Communication and awareness campaigns on flood risk management and natural flood management measures.

Section 0.6 Conclusions

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

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

