

# Dún Laoghaire-Rathdown County Council Chief Executive's Report on Submissions Received to the Draft Climate Action Plan 2024-2029





**Chief Executive's Report**

**on**

**Submissions Received to the**

**Dún Laoghaire-Rathdown County Council**

**Draft Climate Action Plan 2024-2029**

**January 2024**

**Infrastructure and Climate Change Department**

**Dún Laoghaire-Rathdown County Council**

## Contents

1	Introduction .....	4
	Purpose of the report .....	4
	Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA).....	4
	Background to the Draft Climate Action Plan .....	5
2	The public consultation process .....	7
	2.1 Outline of the public consultation process .....	7
	2.2 Key elements of the public consultation process .....	7
	2.3 Public information events .....	9
	2.4 Other engagement with stakeholders' groups .....	10
3	Details of the submissions .....	12
	3.1 Introduction .....	12
	3.2 List of submissions .....	12
	3.3 Summary of issues raised in submissions .....	12
	3.4 Chief Executive’s responses and recommendations.....	13
	3.5 Structure of Proposed Modifications to the Draft Plan .....	14
4	Categorisation, Summary and Responses to Issues Raised .....	15
	4.1 Submissions from Adjoining Local Authorities .....	15
	4.2 Submission from the Department of the Environment, Climate and Communications.....	15
5	Submissions from public consultation .....	19
	5.1 Chapter 1 Introduction .....	19
	5.2 Chapter 2 Climate Action Plan Process and Governance .....	28
	5.3 Chapter 3 Evidence-based Climate Action.....	36
	5.4 Chapter 4 Responding to Risks – Emergency Response Planning .....	41
	5.5 Chapter 5 Our Climate Actions - Mitigation and Adaptation Response .....	44
	5.6 Chapter 6 Decarbonising Zone.....	109
	5.7 Chapter 7 Implementation and Reporting.....	113
6	Submissions from Prescribed Environmental Authorities .....	117
7	Summary of Chief Executive’s recommendations for Proposed Modifications .....	136

8 Conclusions .....	147
Appendix A List of submitters to the Draft Climate Action Plan public consultation process 148	
Appendix B: Public Notice of Draft Plan Public Consultation.....	150
Appendix C: SEA Screening Conclusion and Determination and AA Screening Conclusion and Determination .....	152

**List of Figures**

Figure 1 Social Media Top Tagged Published Posts	8
Figure 2 Published Posts Impressions	8
Figure 3 Four Dublin Local Authorities’ public consultation event, at the Mansion House 17 <sup>th</sup> October, 2023	9
Figure 4 UCD Word Cloud   Group 1	10
Figure 5 IADT Word Cloud   Group 2	10
Figure 6 Comhairle na nÓg Word Cloud	11

**List of Tables**

Table 1	Summary of submissions .....	12
Table 2	Submission issues breakdown .....	13

## 1 Introduction

### Purpose of the report

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

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

Pursuant to the Climate Action and Low Carbon Development Act 2015 as amended by Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021 (referred to from hereon in as the Act), notice of the preparation of the Dún Laoghaire-Rathdown County Council Draft Climate Action Plan 2024-2029, was given on Wednesday 20<sup>th</sup> September 2023. Submissions or observations regarding the Draft Plan and Environmental Reports (Strategic Environmental Assessment and Appropriate Assessment) were invited for a period of just over 6 weeks, from Wednesday 20<sup>th</sup> September 2023 to Friday 3<sup>rd</sup> November 2023, inclusive.

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

- summarises the issues raised by the persons, organisations and bodies in the submissions or observations;
- gives the responses and recommendations of the Chief Executive to the issues raised; and
- outlines any proposed modifications to the Draft Plan on foot of the Public Consultation process.

At the 12 February, 2024, County Council meeting the Elected Members consider this Chief Executive's Report, pursuant to the Climate Action and Low Carbon Development Act 2015 as amended by Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021 and decide by resolution, whether to:

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

The Minister for the Environment, Climate and Communications formally instructed local authorities on 24<sup>th</sup> February 2023 to commence work on their Climate Action Plans and have them adopted within 12 months of that instruction. Therefore, the last date for approval of the dlr Climate Action Plan 2024-2029 is 23<sup>rd</sup> February 2024.

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

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

An Environmental Report accompanies the Draft Climate Action Plan. The Environmental Report contains a detailed analysis of the Draft Climate Action Plan and how the implementation of the Plan would impact on its receiving environment. The Chief Executive's recommendations as set out in this report (including recommendations on the

Environmental Authorities submissions detailed in Section 6), have been assessed to determine whether they would have any significant impact on the environment. Taking into account the mitigation measures which have already been integrated into the Draft Plan, it is considered that the modifications proposed on foot of recommendations in this Chief Executive's Report will not have any significant adverse effect on the environment.

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

The Elected Members shall give approval for the Draft Climate Action Plan only after it been determined that the Draft Plan shall not adversely affect the integrity of a European Site(s) in line with SI 477 (EU Birds and Natural Habitats) Regulations 2011, as amended.

## Background to the Draft Climate Action Plan

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

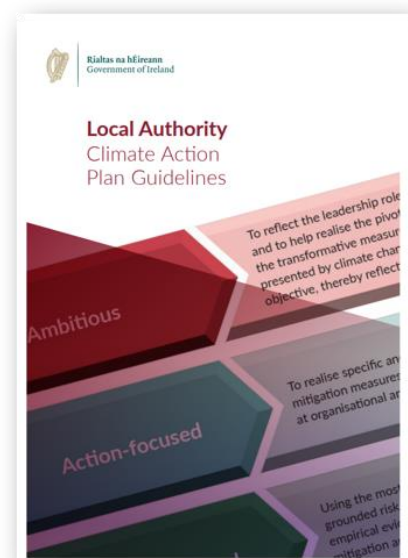
The Draft Plan sets a clear pathway for Dún Laoghaire-Rathdown County Council to:

- actively translate national climate policy to local circumstances with the prioritisation and acceleration of evidence-based measures;
- assist in the delivery of the climate neutrality objective at local and community levels; and
- identify and deliver a Decarbonising Zone (DZ) within the local authority area to act as a test bed for a range of climate mitigation, adaptation and biodiversity measures in a specifically defined area, through the identification of projects and outcomes that will assist in the delivery of the National Climate Objective.

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

The Draft Plan sets out how Dún Laoghaire-Rathdown County Council will be responsible for:

- enhancing climate resilience,
- increasing energy efficiency and
- reducing greenhouse gas emissions, across its own assets, services and infrastructure, to which it is fully accountable for, whilst also demonstrating a broader role of influencing, co-ordinating and facilitating and advocating for other sectors, to meet their own climate targets and ambitions.



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

## **2 The public consultation process**

### **2.1 Outline of the public consultation process**

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

The Act states, that in making the local authority climate action plan, a local authority shall:

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

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

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

### **2.2 Key elements of the public consultation process**

The Draft Climate Action Plan public consultation process involved the following key elements:

#### **Print Media and Website**

On Wednesday, 20<sup>th</sup> September 2023, a press release was issued by the Communications Office detailing the publication of the Draft Plan.

The publication of the Draft Climate Action Plan 2024-2029 was advertised on Wednesday, 20<sup>th</sup> September 2023, in the Irish Times and on Thursday, 21<sup>st</sup> September 2023, in the Dublin Gazette. The notice, published in Irish and English gave all the necessary details of the publication of the Draft Plan and the methods by which members of the public could make submissions or attend consultation events and is provided in Appendix B. This fulfilled the Council's obligations under the Act. In addition, the Dublin Gazette ran an editorial piece on Friday, 29<sup>th</sup> September, 2023 highlighting the publication of the Draft Plan and the methods and deadlines by which the public could make a submission.

The Autumn edition of the dlr times featured details of the Draft Plan and guidance on how the public could make a submission via the public consultation portal hosted on the dlr website.

#### **Radio**

Radio Advertising was co-ordinated across the four Dublin Local Authorities with a total of 588 advertisements played on NewsTalk, FM104, Radio Na Life, Q102 and Spin103 from the October 14<sup>th</sup>, 2023, to October 28<sup>th</sup>, 2023, aired 42 times per day. In addition, the dlr Climate Co-ordinator participated in a radio interview on Wednesday, 10<sup>th</sup> October, 2023,



which was aired on Dublin South FM and gave details of the Draft Plan and information on how and when the public could provide their views on it.

**dlr Website**

The dlr website hosted the Draft Plan throughout the public consultation process as well as all the associated background information.

**Social Media**

Throughout the public consultation period dlr published 69 posts promoting the Draft Plan and encouraging the public to submit their views on it. The result of the post created a total of 46,334 impressions, 408 engagements with Engagement Rate (per Impression) of 0.9%. The posts were issued across dlr's social media platforms Facebook, X and Instagram.

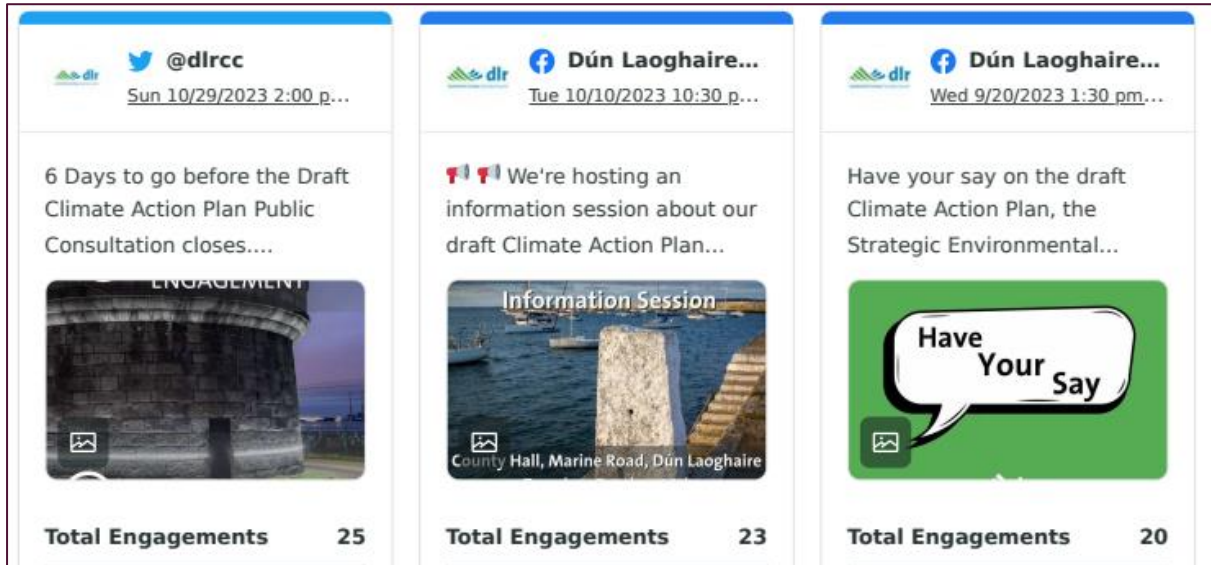


Figure 1 Social Media Top Tagged Published Posts

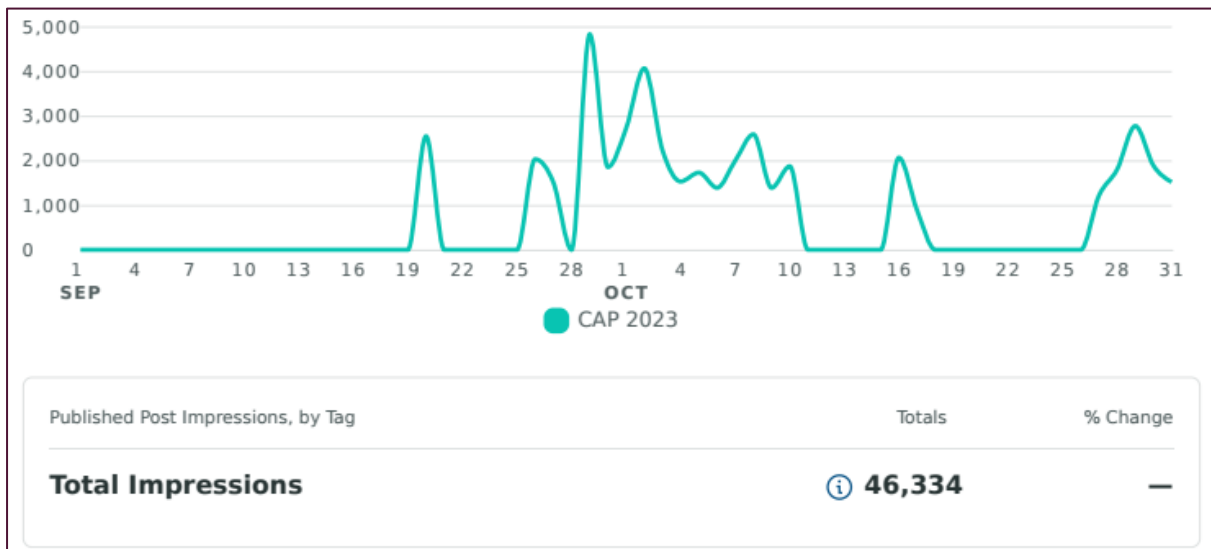


Figure 2 Published Posts Impressions

### **Public Participation Network**

The Public Participation Network (PPN) was notified about the publication of the Draft Plan and provided with details of the associated press release to enable the PPN to publicise it to their mailing list.

### **Adjoining Local Authority Engagement**

All bordering local authorities as well as Fingal County Council were notified about the publication of the Draft Plan.

### **Prescribed Bodies Engagement**

Statutory consultees were notified about the publication of the Draft Plan on Wednesday, 20<sup>th</sup> September, 2023. These are Environmental Protection Agency (EPA), Department of Environment Climate and Communications (DECC), Department of Agriculture, Food and the Marine and the National Parks and Wildlife Service.

### **Elected Member Briefings**

- Wednesday, July 12<sup>th</sup> - Councillors briefing on the Draft Plan
- Tuesday, July 25<sup>th</sup> - Second Councillors briefing on the Draft Plan
- Monday, September 11<sup>th</sup> - briefing on the Draft Plan at the Council Meeting
- Thursday September 21<sup>st</sup> - briefing to the Environment and Climate Action Strategic Policy Committee
- Wednesday, December 6<sup>th</sup> - briefing to the Environment and Climate Action Strategic Policy Committee

## **2.3 Public information events**

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

- Tuesday, 3<sup>rd</sup> October – Parish Pastoral Centre, Dundrum
- Tuesday, 10<sup>th</sup> October – Assembly Hall, County Hall, Dun Laoghaire
- Tuesday, 17<sup>th</sup> October – Round Room, Mansion House – joint event for four Dublin Local Authorities.



Figure 3 Four Dublin Local Authorities' public consultation event, Mansion House 17<sup>th</sup> October, 2023





Figure 6 Comhairle na nÓg Word Cloud

### 3 Details of the submissions

#### 3.1 Introduction

A total of 61 valid submissions and observations were received, the breakdown of which is presented in Table 1.

**Table 1 Summary of submissions**

<b>Submission Type</b>	<b>Number</b>
Online Portal Submissions	48
Posted / Handed Submissions	0
Email Submissions	13
<b>Total Submissions</b>	<b>61</b>

All valid submissions and observations were read, analysed and summarised. An overview of issues raised is provided in Section 3.3. The categorisation and summary of issues raised, and the Chief Executive's (CE) responses and recommendations, are contained in Section 5.

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

#### 3.2 List of submissions

The privacy statement for the dlr Climate Action Plan public consultation process stated the names of submitters would not be made public either in the Chief Executive's report or on the Council's website. The Appendix 1 provides the list of unique identifier reference codes for those that made an online submission. Submissions made by email are noted as email. All submissions listed below have been examined, considered and discussed in the body of the Chief Executive's report. There were no submissions by post.

#### 3.3 Summary of issues raised in submissions

A total of 192 issues were identified from the 61 submissions and observations received. Summaries of all the issues raised in the submissions and observations are set out in Section 5, together with the responses and recommendations of the Chief Executive. Issues have been summarised under the relevant chapter, subsection or appendix heading in Section 5 of this report.

Table 2 below sets out the number and percentage of issues that were raised according to the relevant chapter, subsection or appendix heading of the Draft Climate Action Plan.

**Table 2 Submission issues breakdown**

<b>Submission Heading</b>	<b>No. of Issues Raised</b>	<b>% of Total Issues Raised</b>
Prescribed Bodies	32 (total)	
• EPA	13	7
• Department of Housing, Local Government and Heritage (Archaeology)	11	6
• Department of Housing, Local Government and Heritage (National Parks and Wildlife Service)	4	2
• Department of Agriculture, Forestry and Marine (Sea Fisheries)	4	2
Adjoining Local Authorities	0	0
Department of the Environment, Climate and Communications	1	1
Introduction	17	9
Climate Action Plan Process and Governance	10	5
Evidence-based Climate Action	13	7
Responding to Risks- Emergency Response Planning	7	4
Our Climate Actions – Mitigation and Adaptation Response		
• Energy and Buildings	22	11
• Transport	15	8
• Flood Resilience	13	7
• Nature Based Solutions	27	14
• Circular Economy and Resource Management	13	7
• Community Engagement	6	3
Decarbonising Zone	11	6
Implementation and Reporting	5	3
Appendices	0	0
<b>Total</b>	<b>192</b>	<b>100%</b>

### 3.4 Chief Executive's responses and recommendations

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

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

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

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

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

Among the issues specifically not addressed, commented on or responded to in this report, include matters relating to planning applications, development sites or specific local

authority projects undertaken, or matters confined by legislation. Such matters are best addressed under the various planning processes including development management, forward planning, etc. Matters that are considered helpful to frame future policy will be considered where such considerations do not undermine the integrity of the functions and processes stated above.

### 3.5 Structure of Proposed Modifications to the Draft Plan

Amendments to the text of the Draft Climate Action Plan are identified by their location within each chapter of the Draft Plan.

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

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

Important reader information for Sections 5-7 and tracking and showing proposed changes to the Draft Plan.

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

**The implementation, monitoring and future updates of the local authority Climate Action Plan will be consistent with and have regard to the national Climate Action Plan and any future such Plans.**

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

**~~The Council shall adopt the following actions in regard to climate action.~~**

## 4 Categorisation, Summary and Responses to Issues Raised

All **61** valid submissions and observations were read, analysed and summarised. The report takes the following format to address issues raised in the submissions and observations received.

### 4.1 Submissions from Adjoining Local Authorities

There were no submissions in the dlr Draft Climate Action Plan from adjoining local authorities.

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

The Department of the Environment, Climate and Communications and the Department of Transport made submissions.

Submission	Submission Summary	CE Response and Recommendation
<p><b>Department of the Environment, Climate and Communications</b></p>	<p>The submission outlines that the legislation, the LA CAP shall, in so far as practicable, be consistent with the most recent approved climate action plan and national adaptation framework. In making a LA CAP, a local authority shall have regard to (a) the most recent approved national long term climate action strategy, (b) the most recent approved sectoral adaptation plans, and (c) any policies of the Minister or the Government on climate change.</p> <p>Each local authority is responsible for reducing greenhouse gas emissions from across its own assets and infrastructure, while also taking on a broader role of working with others to reduce emissions within the local authority area.</p>	<p><b>CE Response:</b></p> <p>The Department of the Environment, Climate and Communications submission is welcomed in relation to the commitment to training and resourcing for climate action in the Council and looks forward to the introduction of a monitoring and reporting system to compliment the Draft Plan.</p> <p>The Draft Climate Action Plan prepared by dlr has identified a decarbonising zone which should provide a platform for climate change innovation for the county.</p> <p>In developing the Draft Plan dlr was cognisant of the relevant climate strategies, sectoral adaptation plans and government policies. Having regard to the constant developments in the field of climate change some additional text will be added to make</p>



Submission	Submission Summary	CE Response and Recommendation
	<p>Each local authority is required to identify a Decarbonising Zone (DZ) in their jurisdiction within their LA CAP. DZs are a mechanism to harness a portfolio of actions, projects and technologies to deliver national and regional climate objective at local level.</p> <p>A monitoring and reporting system to support the LA CAPs will be developed by DECC in collaboration with the local government sector.</p> <p>The Department funds the Local Authority Climate Action Training Programme to ensure ongoing upskilling for local authority staff and elected members.</p>	<p>note of future policy documents that could influence climate action and the Draft Climate Action Plan for dlr.</p> <p>A change to the Chapter 1 Introduction of the Draft Climate Action Plan 2024-2029 for dlr county is required on page 15.</p> <p><b>CE Recommendation</b> Paragraph 1 on page 15 to be replaced by the text below as follows:</p> <p><b>Climate Action Plan 2024</b></p> <p>Climate Action Plan 2024 builds upon previous Plans, by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. The Plan provides a roadmap for taking decisive action to halve Ireland’s emissions by 2030 and reach net zero by no later than 2050, as committed to in the Climate Action and Low Carbon Development (Amendment) Act 2021.</p> <p>CAP24 recognises that local government has a key role to play in implementing measures to meet Ireland’s national climate targets and in supporting and mobilising climate action. At the regional and local levels. This role will increase with the development of Local Authority Climate Action Plans (LACAP). These Plans will provide a strong emphasis on a place-based approach to climate action, promoting a better public understanding of climate related risks at the</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>local level and addressing context specific conditions.</p> <p>CAP24 includes the following local government specific climate actions:</p> <p>LG/24/1 - Adopt the Local Authority Climate Action Plans                      LG/24/2 - Develop Decarbonising Zones                      LG/24/3 - Develop a monitoring and reporting system for the Local Authority Climate Action Plans                      LG/24/4 - Review and update the Climate Action Charter                      LG/24/5 - Roll out Phase 2 of the Smart and Sustainable Mobility Accelerator Programme                      LG/24/6 - Support Cork and Dublin in the EU Climate - neutral and Smart Cities Mission</p> <p>The Council will continue to have regard to the national Climate Action Plan (and revisions thereof) in implementing and monitoring the local authority Climate Action Plan.</p>

Submission	Submission Summary	CE Response and Recommendation
<p><b>Department of Transport</b></p>	<p>The submission outlines at a high level without specific reference to actions within the Draft climate action plan. The submission discusses the Department of Transport’s policies under the following categories:</p> <ol style="list-style-type: none"> <li>1. Public engagement and Project Acceptance Communications</li> <li>2. Smart and Sustainable Mobility Workshops</li> <li>3. Demand Management, Parking Policy, Air Quality and Sustainable Mobility,</li> <li>4. Active Travel Infrastructure</li> <li>5. Road-space Reallocation, DMURS, and Accessibility and Public Realm.</li> <li>6. Integrated Land-use and Transport Planning</li> <li>7. Climate Adaptation</li> <li>8. EV Charging Infrastructure</li> </ol> <p>The submission states that when developing 5–Year Climate Action Plans, Local Authorities are requested to recognise the importance of the policies detailed above in supporting the achievement of Ireland’s transport emissions targets, as well as the key role of Local Authorities in delivery and implementation of those policies</p>	<p><b>CE Response:</b></p> <p>The Department of Transport submission is welcomed. It is considered the objectives of the Department align with the Actions set out in the Draft Plan. dlr look forward to continued work with the Department in the implementation of the Climate Action Plan 2024-2029.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan</p>

## 5 Submissions from public consultation

The following tables are a description of the submissions received as invited in the consultation process under each chapter as list in the table of contents of the Draft Climate Action Plan, a summary of that submission, the Chief Executive Officer's response, and the Chief Executive Officer's recommendation. Submissions that contained the same theme or subject have been bundled under the same 'Issue Title' for that Chapter. Green text notes additional text to be added to the Draft Plan, and red text with a strikethrough represents text to be removed from the Draft Plan. In most cases the changes are additional (green) text.

### 5.1 Chapter 1 Introduction

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> Readability of the Plan</p>	<p>Submissions raised concerns regarding the potential difficulty some individuals may have when reading the document as well as the extensive information included in the document. Insufficient timelines and detailed action breakdowns were also identified as issues. Submissions encouraged making the Plan more accessible.</p> <p>A submission included a request for an index to make the document more readable and a printer friendly text option of the report.</p>	<p><b>CE Response:</b> The document uses a mix of text, tables, tended to all graphs and infographics to convey the wide variety of climate change information in a manner that is considered appropriate for the broad range of readers. Timelines and action breakdowns are discussed in other chapters in the Draft Plan, particularly chapter 5.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Want to see more Action targets and timelines</p>	<p>Submissions raised the issue of wanting to see more target details and timelines for emission reductions.</p> <p>Submissions also requested baseline data and information on the impacts for Dún Laoghaire-Rathdown.</p>	<p><b>CE Response:</b> The Introduction chapter sets the scene for climate change and the county - more details on targets, plans for emissions reductions are set out in other chapters, particularly in Chapter 5.</p> <p>The baseline for greenhouse gas emissions is 2018 as</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>discussed on page 115, 122 and 123.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Urgency of climate action</p>	<p>Submissions raised the issue that the Plan does not mention the urgency of the climate crisis and there needs to be a greater sense of urgency in relation to implementing measures under the Plan.</p>	<p><b>CE Response:</b> The Draft Plan acknowledges climate change is one of the greatest global and local challenges of our time and that addressing it depends on the co-operation of a wide range of stakeholders and involves significant behavioural changes. (Page 3). Timelines for the implementation of some Actions are informed by statutory processes, available funding and collaboration with external public agencies, communities and businesses. The Council is committed to taking leadership and using its influence to prioritise climate action both in its operations and within the county to deliver real and lasting impacts.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Leading by Example</p>	<p>The submission requested dlr staff and Councillors lead by example in using low travel emission options.</p>	<p><b>CE Response:</b> The Council offers and promotes low emission travel options for its staff - bicycles, electric bicycles, electric</p>

Chief Executive’s Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>vehicles, and the use of public transport.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Cycling Infrastructure</p>	<p>Submission requested no change to existing roads and traffic management stating that few people cycle due to weather and age and the changes are an imposition.</p>	<p><b>CE Response:</b> The national targets to reduce emissions from transport require the provision of public transport, walking and cycling infrastructure in the county.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Information on Climate change is erroneous</p>	<p>Submission raised the issue that the opinions on climate change are erroneous. Carbon dioxide at 0.04% of the atmosphere is unable to affect the climate in a manner that is portrayed.</p>	<p><b>CE Response:</b> The production of the Draft Climate Action Plan for the county is a statutory requirement and it is aligned with the national Climate Action Plan (CAP24) 2024 and the link in national CAP24 between atmospheric carbon dioxide concentrations and climate change.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Societal changes and Just Transition</p>	<p>Submissions raised the issue of the societal changes that will occur because of climate change and requested more emphasis on a just transition and supporting different members of society.</p>	<p><b>CE Response:</b> The concern regarding a just transition is noted, and an additional Action will be included in the Draft Plan to address this.</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p><b>CE Recommendation</b>            New Action Ref C24 to be added to the Community Engagement Chapter. Action wording 'Explore and respond to ways in which the climate transition will affect different groups in the county including facilitating skills training and energy poverty reduction measures so that no one is left behind, Tracking Measure wording Number of people availing of interventions offered, Timeframe wording 2029, Adaptation/Mitigation wording Mitigation, Council Role wording Full Accountability/ Influence /Co-ordinate and facilitate /Advocate. Lead Department(s) wording Infrastructure and Climate change (inc. Road Maintenance and Traffic). Partners Identified wording Codema, Third Level Institutions, the HSE and the Community and Voluntary Sector.</p>
<p><b>Issue Title</b>            Climate change education</p>	<p>Submission requested that the economic, environmental, social, health and wellbeing benefits of climate action should form part of the</p>	<p><b>CE Response:</b>            Climate change in the national curriculum is a matter for the Department of Education. There</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>school curriculum and be circulated to community and voluntary groups for discussion and awareness-raising.</p>	<p>are several Actions in the Community Engagement Chapter to raise awareness of the benefits of climate change to community and voluntary groups.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Protection of water quality</p>	<p>Submission noted that the integrated approach in the Plan commits to achieving climate goals whilst safeguarding water resources (including small lakes) and protecting the environment.</p>	<p><b>CE Response:</b> The submission is noted.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Degrowth strategies</p>	<p>Submission requested inclusion of degrowth strategies in Figure 1.3 of the Draft Plan.</p>	<p><b>CE Response:</b> Degrowth strategies are a matter for central government and are outside the scope of the Draft Plan. The influence of international markets. The Draft Plan's remit under the Circular Economy chapter addresses reuse of materials and products.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> More ambition in the Plan</p>	<p>Submission requested that the vision for the Plan be more ambitious to be fully aligned with Ireland's binding target of reaching carbon neutrality by 2050.</p>	<p><b>CE Response:</b> The Draft Plan is aligned with national Climate Action policies and the targets stemming from those. It is likely the national ambition will increase over time</p>



Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>and the Council will take account of this in compiling the annual Progress Report on the delivery of its Climate Action Plan.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Co-benefits of climate action</p>	<p>The submission raised the issue of the emphasis placed on monitoring and reducing carbon emissions without giving attention to other standards e.g. improved air quality.</p>	<p><b>CE Response:</b> The potential economic, environmental, societal and health and wellbeing benefits of climate action, including improved air quality, are outlined on Pages 18, 63,73, 84, 95 and 105 of the Draft Plan.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Waste and greenhouse emissions</p>	<p>Submission raised the issue that the Plan does not mention emissions from waste and incineration. The submission also queried what emissions reduction have been achieved between 2018 to 2023 and stated that information on Page 14 of the Plan is misleading as the bulk on the balancing of emissions will be through reduction rather than removal of greenhouse gases.</p>	<p><b>CE Response:</b> There is no incineration of waste in dlr and waste related emissions are referenced on page 93 of the Draft Plan. The Draft Plan focuses on both the reduction and elimination of greenhouse gases as both help to achieve the aim of limiting global temperature increases. A review of the performance of the current Climate Action Plan is published annually.</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Phasing out of fossil fuels</p>	<p>The submission requested that the Plan should ensure a rapid phasing out of all fossil fuels, and a planned phasing out of existing connections to the gas grid and it should ban fracked gas in its energy mix. It should rule out any new fossil fuel infrastructure projects. The submission stated the best energy security remains a rapid transition to indigenous renewable energy and a society-wide reduction in energy demand.</p>	<p><b>CE Response:</b> The issues raised are noted. The Draft Plan advocates the uptake and use of renewable fuels and energy. The Council in its operations is transitioning to renewable fuels and energy sources and driving energy efficiency in its operations. The submission of connections to the gas grid and fracking is outside the remit of the Draft Plan.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Airfield Estate</p>	<p>Submission requested that Airfield Estate be considered as a key working partner in delivering the Climate Action Plan</p> <p>Submission also requested incorporating a food policy into the Plan and noted within the Plan that food is not mentioned outside of food waste.</p>	<p><b>CE Response:</b> The request is addressed in the Community Engagement Chapter. The national Waste Management Plan provides the policy on food waste for the county which is provided for in the Draft Plan in Action R2.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Tracking and measuring</p>	<p>Submission noted that the plan does not sufficiently consider the Green House Gas impacts of products and services or the potential for circular</p>	<p><b>CE Response:</b> The issues raised are noted. Each Action in the Draft Plan has a 'Tracking Measure' and</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>economy action to address these impacts. The submission also noted the targets do not currently align with the mission to deliver measurable climate actions and the Plan's specific targets could be strengthened by providing measures that track progress.</p>	<p>the sum of the Actions, and their tracking measures will track progress towards achieving the aims of the Draft Plan. As the Draft Plan is implemented over its lifetime it is likely the sophistication of measuring and tracking will improve.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> The plan is at odds with lifestyles</p>	<p>Submission noted the summary of potential benefits is aspirational with tenuous conclusions, in addition it was noted the actions may force people into lifestyle changes that may be counterproductive.</p>	<p><b>CE Response:</b> The submission is noted. The themes and Actions contained in the Draft Plan follow national climate change policies.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Energy Efficiency – consider adding info box</p>	<p>Submission requested inclusion of an info box with a quick definition of energy efficiency. Submission also requested how energy efficiency will be measured, and how the Council will know it has improved.</p>	<p><b>CE Response:</b> An info box with a definition of energy efficiency will be added. The Council tracks its energy efficiency through assessment of its utility bills for fuel and electricity. Energy efficiency improvements are reflected in reduced energy input for the same output of work or service.</p> <p><b>CE Recommendation</b> Page 47 - the following definition for energy efficiency</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		to be added 'Energy efficiency is the use of less energy to perform the same task or produce the same result. Energy-efficient homes and buildings use less energy to heat, cool, and run appliances and electronics, and energy-efficient manufacturing facilities use less energy to produce goods.'

## 5.2 Chapter 2 Climate Action Plan Process and Governance

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> Public Consultation</p>	<p>Submissions requested faster turnaround of planning and consultations to ensure timely delivery of the Plan. Submission also noted the importance of getting buy-in from everyone and to not make climate change initiatives political issues to be fought over.</p>	<p><b>CE Response:</b> The time taken to implement actions requiring planning or public consultation is bound by the limits of legislation. Comments regarding delivery of the ideas and buy-in are noted.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Measurable targets/alignment with Climate Law</p>	<p>Submissions raised the need for more specific targets with particular mention of transport and reducing private cars. Submission suggested that the Plan must demonstrate a clear alignment with National Climate Law, carbon budgets and targets and outline a strategy based upon timelines and emissions reductions which will reach those targets.</p>	<p><b>CE Response:</b> Noted and addressed in pages 14-17 and in Chapter 5 (pages 45-109)</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Council Leading by Example</p>	<p>Submission raised the issue of liking to see a plan to 'reduce your use' of energy for Council areas and staff and when facilitating active transport, co-ordinators using active transport routes themselves to know the obstacles to active travel and how to mitigate them. Submission also expressed a hope that the budget for the actions will be prioritised according to their effectiveness in reducing emissions and that new buildings would have low carbon footprint (unlike Lexicon). The Council was asked to refrain from building such projects unless it can be done sustainably. Submission stated that the</p>	<p><b>CE Response:</b> The energy reduction plan is detailed in the Energy and Building Actions on pages 52-55. Council staff are encouraged and facilitated to use active travel modes of transport in the delivery of their work. The emissions assessment associated with the actions in the Draft Plan and the work of the Council will be developed over the life of the Plan. The suggestion to communicate 'Climate First Approach' more is noted.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>'Climate First Approach' to decision making in the Council is welcome and asked that this be communicated to the public.</p>	
<p><b>Issue Title</b> Flooding</p>	<p>Submission noted that flooding is purported as caused by climate change, yet issues related to unserviced gullies or incorrect gully styles placed beside unkept hedging and excessive littering are not blamed for blockages that lead to flooding.</p>	<p><b>CE Response:</b> Actions relating to improved maintenance of Stormwater, Surface Water and Road Gulley Networks are listed on page 75 of the Draft Plan. Surface water drains and critical flood gulleys are known and maintained in advance of storm events. Routine maintenance of the gully and drain network is carried out throughout the year and additional maintenance and repairs are implemented when necessary.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Collaboration</p>	<p>Submissions acknowledged greater collaboration and consistency of approach among neighbouring local authorities is critical to address carbon emissions (especially carbon emissions relating to transport) and stated that the plan should be more specific as how this collaboration will take place.</p> <p>Submission stated that Airfield Estate would welcome the opportunity to take part in any fora/groups to drive the climate agenda and as a potential research partner to the Council on matters of food sustainability and pointed out that Airfield has set up a Youth Board to help give the youth a voice in sustainability which the Council could engage with.</p>	<p><b>CE Response:</b> The collaborative process is described in detail on Page 133. Airfield Estate's interest in collaborating with the Council is noted. The 'Designing our Public Services' principles and approach will be applied in the delivery of the Plan.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>Submission suggested the Council should consider "Designing Our Public Services" principles in the Plan (e.g. putting people first, designing for trust and building, testing, learning and iterating) as this approach could be a valuable tool in informing the plan's key target of engagement with and informing communities.</p>	
<p><b>Issue Title</b> Organisational Structure</p>	<p>Submissions stated that a clear statement of who within the Council has authority and responsibility in relation to the different aspects of implementation of the Plan once approved would be helpful. The mention of a Climate Action team doesn't situate them within the Council's overall structure of Directorates and an attempt to locate such an organigram on the Council's own website failed! This is an omission affecting public access to and communication with the policymakers and implementation team/s.</p>	<p><b>CE Response:</b> Implementation of the climate actions contained within the Plan will be cross departmental. The Climate Action Team sits under the Climate Change and Infrastructure Directorate. The Council has a specific climate email address <a href="mailto:climate@dlrcoco.ie">climate@dlrcoco.ie</a> for the public to access the implementation team.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Emissions monitoring/reduction and the impact of Actions and budgetary implications/reporting</p>	<p>a. Submission asked for a clear statement in the Plan that the Council is aligned with the National Climate Objective and will work to reduce greenhouse gas emissions by 51% by 2030 (in areas directly controlled by the Council and where the Council has an indirect influence).</p>	<p>a. <b>CE Response:</b> The Draft Plan has clear targets set out on page 17 including 50% improvement in the Council's energy efficiency and 51% reduction in the Council's greenhouse gas emissions by 2030. The dlr Draft Climate Action Plan is aligned with the national Climate Action Plan 2024 and national objectives.</p>

Submission	Submission Summary	CE Response and Recommendation
	<p>b.</p> <p>It also asked if it is possible to quantify the greenhouse gas emissions from the County currently, to estimate what the emissions will be if all actions contained within the Plan are undertaken and to outline the Council's approach to monitoring greenhouse gas emissions across the County to make it clear how the Plan will be assessed as to whether it is performing or not.</p> <p>c.</p> <p>Submission suggested that the Plan include an estimate of the impact that each measure will have on reducing greenhouse gas emissions, and a level of prioritisation of the actions, so it can be known which actions are the most important to undertake and fund.</p>	<p><b>CE Recommendation</b> No change to the Draft Plan.</p> <p>b.</p> <p><b>CE Response:</b> The emissions information in Chapter 6 Decarbonising Zone pages 115 to 127 of the Draft Plan provides the information sought.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p> <p>c.</p> <p><b>CE Response:</b> The Council will work with its partners in the CARO and CODEMA (Dublin's Energy Agency) to carry out an assessment of all the actions in the Draft Plan, to identify the projects with the greatest potential for carbon emission reduction across the county, with special focus on projects within the Decarbonising Zone (DZ) of Dún Laoghaire and Blackrock. CODEMA continues to work with the Council's energy team to maintain a gap to target for carbon reduction toward 2030 and 2050 targets. This work also produces a register of opportunities to target projects with the greatest capacity for carbon reduction and to recommend that these projects are prioritised over others. The Project Governance Board will review and assess these projects for funding as they</p>



Submission	Submission Summary	CE Response and Recommendation
	<p>d.</p> <p>Submission requested that the final Plan include a carbon analysis of the 3-year capital programme to help with understanding the embedded, operational and indirect carbon impact of the programme.</p>	<p>come before the Board for approval and will seek to prioritise funding for greater carbon reduction.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p> <p>d.</p> <p><b>CE Response:</b> The Council will be working with its partners in the CARO and CODEMA (Dublin's Energy Agency) to source specialist consultants to assist in developing a carbon budget estimate for the Council's capital budget projects. The Council will also be updating the terms of reference in its Projects Governance Board, to have a greater emphasis on carbon budget estimates for projects that are seeking approval for capital funding. This will be especially important for projects that are situated within the designated Decarbonising Zone (DZ) of Dún Laoghaire and Blackrock. The Council will also seek to put a process in place, requiring all tenders for projects in the DZ to include a requirement for a carbon budget estimate to be included in all tender documentation. This requirement will form part of the evaluation process for all capital projects in these areas going forward.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>

Submission	Submission Summary	CE Response and Recommendation
	<p>e.</p> <p>Submission noted that the Council there are actions in the National Climate Action Plan that are not integrated into the dlr Draft Climate Action Plan and asked that this be reviewed to include a greater level of ambition.</p> <p>f.</p> <p>Submission asked that an action be added for the annual Council budget to include costings for each climate action on an ongoing basis and that the Executive's annual budget report include a schedule of the Climate Action Plan's actions and the cost to implement them in that year.</p>	<p>e.</p> <p><b>CE Response:</b> The dlr Draft Climate Action Plan is aligned with the national Climate Action Plan 2024 and national objectives as applicable to Dún Laoghaire-Rathdown County.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p> <p>f.</p> <p><b>CE Response:</b> Each directorate which has put forward actions to be included in the Draft Plan was requested to ensure that the actions within their areas are budgeted for, either within the capital programme, the revenue budget or have an element of governmental funding and match funding to ensure they are achievable within the life of the Draft Plan. For example, the Active Travel Schemes, which contribute massively toward the decarbonisation of Dún Laoghaire have secured funding from the NTA and match funding from the dlr capital programme, to ensure the schemes are delivered subject to Part 8 Planning in 2024. The same would apply for Housing Retrofitting Projects, Corporate Building Upgrades, Public Lighting, and Special Projects. The Projects Governance Board will also be reviewing CAP Actions that come before it monthly as projects seek capital funding approval, to ensure they are prioritised.</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Biodiversity Crisis</p>	<p>Submission stated that in recognising the absolute interconnectedness of the biodiversity crisis and the climate crisis why is there two different plans with different time spans?</p>	<p><b>CE Response:</b> The Draft Climate Action Plan was prepared to meet with legislative requirements of the Climate Change and Low Carbon Development (Amendment) Act 2021. The Biodiversity Action Plan 2021-2025 was developed prior to the requirements of this Act.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Plan Design</p>	<p>Submission stated that the Plan is too complicated and opaque for the general reader. Submission stated that the Plan needs to be more explicit about which areas will be prioritised and supervised and how the commitment to a just transition will work as there are no examples of this. Submission suggested the Council should make future Draft Climate Action Plans much easier to access for ordinary members of the public by having an accessible, plain English preface which highlights key aspirations and goals, to bridge the gap between the ordinary citizen and specialist worker in the Council so it is read by more than just those in this area of work.</p> <p>Submission stated that it was promising to see the recent legislation and planning for climate action as it is needed to hit the</p>	<p><b>CE Response:</b> The Draft Plan was designed to appeal to a very broad range of readers. It includes a mix of text, data and infographics to meet all readership. With respect to how the commitment to a just transition will work a new action will be added to the Draft Plan to explain this more fully. Comments regarding legislation and planning are noted.</p> <p><b>CE Recommendation</b> New action Ref <b>C24</b> to be added to the Community Engagement Chapter of the Draft Plan Action <b>'Explore and respond to ways in which the climate transition will affect different groups in the county including facilitating skills training and energy poverty reduction measures so that no one is left behind, Tracking Measure Number of people availing of interventions offered, Timeframe 2029, Mitigation, Council Role Full Accountability/Influence /Co-ordinate and facilitate /Advocate. Lead</b></p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	targets.	Department <a href="#">Infrastructure and Climate change (inc. Road Maintenance and Traffic)</a> . Partners Identified <a href="#">Codema, Third Level Institutions, the HSE and the Community and Voluntary Sector</a> .
<b>Issue Title</b> Strategic Environmental Objectives	Submission stated that in considering strategic environmental objectives, they should where possible, reflect the plan being prepared, rather than use more generic environmental objectives as this will help both in considering more specific monitoring and mitigation measures, when required.	<b>CE Response:</b> The strategic environmental assessment process employed in the preparation of the draft Climate Change Plan 2024-2029 meets the regulatory requirements.  <b>CE Recommendation</b> No change to the Draft Plan.

### 5.3 Chapter 3 Evidence-based Climate Action

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> Population growth /employees</p>	<p>The submission noted that on Page 28 there was no allowance for population growth in services delivery.</p> <p>The submission suggested Council employees and contractors should preferably be chosen from the local area as per the 10-minute neighbourhood concept.</p>	<p><b>CE Response:</b> Comment regarding population growth is noted. The baseline years for energy efficiency and greenhouse gas emissions reductions are the metrics and regardless of growth performance will be measured against these metrics.</p> <p>The engagement of employees and contracts is outside the scope of the Plan.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Future Risk Assessments and Profiling</p>	<p>Submissions requested expanding future risk assessments to include low-likelihood high impact scenarios, e.g. a climate event leading to an unexpected increase in sea level rise and additional risks that are associated with gradual, slow onset effects. The submission stated that better data for emissions profiling would be beneficial and that citizen science projects could assist with this in the near term and into the future. The submissions also requested the inclusion of additional historical data and trends in the evidence base for the risk assessment and that the Council monitor groundwater data as it is a useful early warning system for flooding events.</p>	<p><b>CE Response:</b> The suggestion for future risk assessment making is noted. The assessing of risk in the Draft Plan was developed using best practice. However, the suggestion will be included in discussion of any future risk assessment process.</p> <p>The suggestion regarding citizen science is catered for in Action C3.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Financial Risk</p>	<p>Submission asked if the financial risk had been considered in the Plan.</p>	<p><b>CE Response:</b> Each directorate that put forward actions to be included in the Draft Plan was requested to ensure that the actions within their areas of responsibility were budgeted for, either</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>within the capital programme or had an element of central government funding and match funding to ensure they would be achievable within the life of the Draft Plan. The Projects Governance Board will be reviewing the Draft Plan's Actions that come before it monthly as projects are seeking capital funding approval to ensure these Actions are prioritised. The same approach would apply to other emission reduction projects including Housing Retrofitting Projects, Corporate Building Upgrades, Public Lighting and Special Projects.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Emissions reduction</p>	<p>Submission stated that far more can be done to reduce emissions within the county boundary (e.g., transport emissions - through planning) and that the IGBC and Allianz who are working on the Climate Safe Homes Initiative can share findings with the Council.</p>	<p><b>CE Response:</b> Submission is noted and the offer of information sharing is welcomed.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Active and sustainable Travel</p>	<p>Submission asked what the specific actions are to prioritise Active Travel and felt this chapter seemed totally aspirational and not target based. It also stated we don't need any more SUVs, but rather small compact city cars or EVs.</p>	<p><b>CE Response:</b> Actions listed on pages 64-66 relate to actions that promote/support active travel.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Grants for Householders</p>	<p>The submission stated that more urgency is needed in the message on climate change if the 51% emissions improvement is to be achieved and that the Council should</p>	<p><b>CE Response:</b> The issues raised is noted and the Council will advocate through channels available at local, regional and national level for incentives which will help achieve the</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>advocate for more generous grants for householders.</p>	<p>objectives of the Plan. This advocacy role is described in Chapter 5 of the Draft Plan.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Priority of Active travel and public transport solutions</p>	<p>Submission stated that active travel and public transport solutions should be prioritised if climate action is meant seriously. Submission requested rephrasing "Active travel and public transport solutions should be prioritised" to "will be prioritised." It also noted that electronic vehicles are not a solution to the climate emergency and suggested that collective, public infrastructure is the only way forward.</p>	<p><b>CE Response:</b> The rephrasing requested on page 31 is accepted to read 'Active travel (walking and cycling) and public transport solutions will be prioritised'</p> <p><b>CE Recommendation</b> Text on Page 31 to be altered to read 'Active travel (walking and cycling) and public transport solutions will be prioritised.'</p>
<p><b>Issue Title</b> Public Transport, linkages between energy and spatial planning and data centres</p>	<p>The submission noted that many of the descriptions on page 31 are opaque and that the document contains virtually no information/plans for public transport. It also asked what was meant by the statement 'to develop increased linkages between energy and local level spatial planning'? The submission suggested that existing data centres and new data centres in the county should use renewable energy and energy demand from data centres should be capped.</p>	<p><b>CE Response:</b> The Council is committed to working with the relevant transport bodies to enhance public transport options to facilitate the transition to more sustainable travel options. Chapter 5 of the Draft Plan (Pages 64-66) lists Actions regarding transport including Public Transport and the Council's role to facilitate public transport. An example of linkages between energy and local spatial planning is matching an activity that produces heat supply to a development that requires heat. There are no data centres in the County.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Carbon sinks and actions to meet emission reduction targets</p>	<p>The submission referred to the comment that urban areas 'tend to have' fewer carbon sinks (page 30) and asked if there was a</p>	<p><b>CE Response:</b></p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>mention of creating carbon sinks in our urban areas such as in urban gardens, unmowed verges or pocket forests. Ireland is not meeting its annual 7% emissions reduction target and our climate policies and measures are not enough to achieve 51% by 2050 according to the EPA. That we are so far not doing well and need to do a lot more to meet our commitments needs to be acknowledged – the Plan should make it clear that we have far to go.</p>	<p>The Draft Plan contains Adaptation and Mitigation Actions to be delivered across a wide variety of activities in the county. The Actions for Flood Resilience (Pages 74-77) and Nature Based Solutions (Pages 85-88) provide practical and achievable Actions in this regard. The Chapter on Community Engagement allows for the development of ideas to assist in meeting emission reduction targets as the Draft Plan is implemented.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Scope 3 emissions</p>	<p>The submission suggested that the Council should provide an estimate of Scope 3 emissions associated with its activities - in particular, purchased goods and services as this would demonstrate the significant contribution of purchased goods and services on overall impacts and would inform the strategic priorities identified as emissions reduction pathways. Currently the focus is entirely on addressing energy consumption and overlooks the opportunities available through circular actions to reduce carbon emissions. Strategic priorities on circular economy or specific product related emissions should be considered.</p>	<p><b>CE Response:</b> The issue raised is noted and the Council will work with its partners in the CARO and CODEMA (Dublin's Energy Agency) and other interested and specialist entities to investigate scope 3 emissions over the lifetime of the Draft Plan.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Disjointed aspirations</p>	<p>Submission noted the dissonance (disjointed) of some of the aspirations in the Plan e.g. the Council looks to achieve 10-minute neighbourhoods but supports the</p>	<p><b>CE Response:</b> Development policy is driven by the County Development Plan and the extensive spatial and community needs examination, and</p>



Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	development of car dependent developments like the Carrickmines Shopping Centre.	<p>public consultation carried out in that process. The Draft Climate Action Plan does not examine individual development projects as this is outside its scope.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Plan text and layout</p>	<p>Submission noted that Table 3.2 on page 27 Largest Emitters should read 'Proportion of emissions by source' rather than by 'energy source' and asked that using equal-width columns be considered for the data columns on each table. It also suggested that moving the note box on page 31 to the first mention of carbon dioxide equivalent on Page 30 would be helpful and noted a couple of instances where the '2' in carbon dioxide is not in subscript. It stated that it was good to see Actions F17-F21 in the Plan to monitor changes along the coastline.</p>	<p><b>CE Response:</b> The visual and textual items discussed in the submission will be examined when preparing the final version of the Climate Action Plan 2024-2029.</p> <p><b>CE Recommendation</b> Layout changes to text and Table 3.2 as suggested will be made where appropriate.</p>
<p><b>Issue Title</b> Gulf Stream</p>	<p>Submission asked if the scenario of a weakening Gulf Stream causing a colder climate in Ireland had been considered?</p>	<p><b>CE Response:</b> The complexities of a weakened Gulf Stream are regarded as a national level matter and beyond the scope of this county level Draft Climate Action Plan. Government policies developed in respect of changes or impacts of a weakened Gulf Stream will be considered by the Council as they arise.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>

### 5.4 Chapter 4 Responding to Risks – Emergency Response Planning

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> Measurement of Goals</p>	<p>Submission raised the issue of how goals will be measured and queried where was a list of proactive measures.</p>	<p><b>CE Response:</b> Mitigation and Adaptation Responses are set out in chapter 5 of the Draft Plan including specific Actions and Tracking Measures.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Maintenance of storm drains and gullies</p>	<p>Submissions raised the issue of the maintenance of surface water drains, culverts and sluice gates during storm events and the importance of building only that which can be maintained. In addition,</p> <ul style="list-style-type: none"> <li>a. Concern was raised about the construction of cycle lanes with defenders and bollards impacting on street sweeping.</li> <li>b. It was requested that the Council commit to providing separate drainage system for foul sewer and storm water.</li> <li>c. It was requested that the Council build more storm drains.</li> </ul>	<p><b>CE Response:</b> Surface water drains - critical flood gulleys are known and maintained in advance of storm events. Normal maintenance applies throughout the year.</p> <p>Concerns a, b and c are dealt with in response to chapter 5 submissions.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Community Alerts</p>	<p>Submissions raised the need for alerts or early warning systems to build capacity within communities in response to flooding events and awareness of preventative actions that can be undertaken within communities. It was recommended that the Sendai Framework be applied in Disaster Risk Management.</p>	<p><b>CE Response:</b> The Council's Major Emergency Management team co-ordinate warnings for flooding and other weather events relevant to the Climate Action Plan which are broadcast in advance of such events. The recommendation in respect of the Sendai Framework is noted.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>

Chief Executive's Report on Submissions Received

<p><b>Issue Title</b> Need for Urgent Action</p>	<p>Submission raised the need for more urgent action to reduce the impacts of climate change.</p>	<p><b>CE Response:</b> The Actions in the Draft Plan meet the SMART criteria of being Achievable and Realistic. There is flexibility within the Community Engagement Chapter of the Draft Plan to develop additional and collective climate change gains for the county over the life of the Draft Plan</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Data query and conclusion in the draft plan</p>	<p>The evidence for hazards is somewhat short showing events mainly in the last 20 years - it should go much further back to give a better picture. Figure 3.5 does not match up well with what is anecdotally presented in Figure 3.6. - the conclusion for severe windstorms seems strange? '...average wind speed will remain similar to those currently experience' misses the point - the conclusion of 'no change ' is wrong. Historical data and trends should not be ignored (even if predictive studies have not been carried out) and plans for more intense and more frequent storms must be made.</p>	<p><b>CE Response:</b> The occurrence of severe storm events is already very frequent so it is likely there will be no significant change as we have reached that point already. Severe windstorms are currently experienced on a very frequent basis across Dún Laoghaire – Rathdown and result in wide-ranging impacts, including damage to power and communication infrastructure, disruption to transport networks and postponement of recreational activities. Projections indicate no significant change to this frequency.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Groundwater monitoring for flooding</p>	<p>Concerned about the lack of attention to groundwater - the Council should plan for the monitoring of groundwater data as it can be a good early warning system of flood events - citizen science monitoring projects could play a role in this.</p>	<p><b>CE Response:</b> The issue raised is noted and will be discussed further in the implementation of Actions in the Community Engagement section of the Draft Plan, e.g. Action C3 Promote Citizen Science projects.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>

Chief Executive's Report on Submissions Received

<p><b>Issue Title</b> Risk scenarios in next Plan</p>	<p>In future risk assessments, it would be helpful to plan for "low-likelihood high impact" scenarios. For example, what if a climate event causes sea level rise to be double what's expected? What if climate change in Europe pushes high numbers of climate refugees to the county?</p>	<p><b>CE Response:</b> The submission issue raised in note for discussion and consideration in the next version of the Plan.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
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## 5.5 Chapter 5 Our Climate Actions - Mitigation and Adaptation Response

### 5.5.1 Energy & Buildings

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> Solar Panels</p>	<p>Submissions raised the issue of the huge delay in roll-out of solar panels on schools and asked if the Council could use its advocacy role to press the Dept. of Education to make better progress on this. Also asked the Council to encourage solar power in all developments both commercial and domestic in the county.</p>	<p><b>CE Response:</b> The provision of solar panels on schools by central government is fully supported by dlr. It is noted that the Schools Photovoltaic Programme opened in November 2023 for a selection of counties and will be open to all counties by the end of 2024. Developments in the county are subject to the Building Regulations including the requirements for renewable energy.</p> <p>The Council will promote the use of solar panels and their benefits throughout the life of this Plan. This will be especially true for the Decarbonising Zone and is catered for in the Register of Opportunities under the Strategic Area of Engagement (Page 129).</p> <p>The County Development Plan 2022-2028 supports the growth in solar photovoltaics and solar thermal use in the County.</p> <p>Section 3.4.2.4 Policy Objective CA13: Solar Energy Infrastructure states that 'It is a Policy Objective to encourage and support the development of solar energy infrastructure, including photovoltaic (PV) and solar thermal and seasonal storage facilities infrastructure in appropriate locations, as a renewable energy resource which can contribute to the transition to a</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>low carbon climate resilient County. It is also a policy objective to support Ireland's renewable energy commitments by facilitating utility scale PV installations for the production of electricity provided they do not negatively impact upon the environmental quality, amenity or heritage of the area.'</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Offshore wind generation - Dublin Array</p>	<p>Submissions raised the issue of offshore wind energy generation being urgent yet none of the actions in the Plan accelerate the build out of turbines. They also mentioned the need that any offshore wind energy generation must minimise impacts on biodiversity. Concern was expressed about the inclusion of a commercial entity (the Dublin Array) in the Plan as if it was in some way an integral part of the Council itself and that should there be a community fund, it must be handed over to the Council to disburse. The tracking measure for EB3 was not regarded as a useful or meaningful way to 'facilitate the development of offshore renewable energy projects. Also mentioned was that the section about the Dublin Array glossed over issues such as the size of turbines being too large and too close to the coast and suggested that whilst less power may be generated by less tall turbines this has to be absorbed by alternatives.</p>	<p><b>CE Response:</b> The issues raised of the proposed Dublin Array will be subject to the requirements of the planning process and the policies and environmental considerations of that process. Its inclusion in the Draft Plan does not affect that planning process.</p> <p>The issue raised about the strength of Action EB3 is noted but the wording is considered to strike the correct balance between advocating climate positive projects and the protection of the environment in the implementation of those projects.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> More advertisement of climate actions taken by the Council.</p>	<p>Submission raised a desire to see more promotion of Council's climate actions already undertaken e.g. solar panels on libraries and leisure centres energy improvements and any future action to be taken.</p>	<p><b>CE Response:</b> The issues raised are noted and the Council will be increasing promotion of its own climate work as an example for others to consider as the Draft Plan is implemented e.g. C20 promoting energy awareness will include an acknowledgement of work done in this regard by the Council.</p> <p>Each year as an Appendix to the Annual Report the Council lists the Energy actions undertaken and those planned for the following year. These returns are also submitted to the SEAI.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Offer of a new product</p>	<p>Submission provided details of a chemical free water treatment product for closed loop heating and cooling systems requesting its use be considered in the plan.</p>	<p><b>CE Response:</b> The request for consideration of the use of a specific product is noted but this is outside the remit of the Draft Plan. However, the Council is always open to discuss new ideas and products in the pursuit of the Climate Action objectives of the Draft Plan.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Carbon emissions from construction and built environment</p>	<p>a. Submissions raised the issue of repurposing existing buildings for housing/other needs to mitigate carbon emissions from construction given 14% of Ireland's overall GHG emissions are associated with embodied carbon emissions from construction.</p>	<p>a. <b>CE Response:</b> Section 3.4.1.2 Policy Objective CA6: Retrofit and Reuse of Buildings of the County Development Plan 2022-2028 states that 'It is a Policy Objective to require the retrofitting and reuse of existing buildings rather than their demolition and reconstruction where</p>

Submission	Submission Summary	CE Response and Recommendation
	<p>b. Submissions recommended that action EB 22 should not be restricted to heritage resources alone but extended to all built environment infrastructure and concern was raised about the number of disused and derelict buildings in the county and the need to work towards repurposing as many as possible to meet the housing need.</p> <p>c. It was suggested that the cost of embedded carbon in these buildings needed to be counted and the ethos of the circular economy applied to building work in the county. EB22 was regarded as very virtuous, and support was given for the historic structures/traditional buildings to be considered strongly as opportunities for repurposing for housing. Concrete was</p>	<p>possible recognising the embodied energy in existing buildings and thereby reducing the overall embodied energy in construction as set out in the Urban Design Manual (Department of Environment Heritage and Local Government, 2009). (Consistent with RPO 7.40 and 7.41 of the RSES).'</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p> <p>b. <b>CE Response:</b> The submission is noted. Action EB22 is designed to address the need to protect and adapt our Heritage Resource. The decarbonising of housing in general will be fully explored through climate work extending from Chapter 6 of the Draft Climate Action Plan in the Decarbonising Zone.</p> <p><b>CE Recommendation</b> No change to the Draft Plan</p> <p>c. <b>CE Response:</b> The County Development Plan 2022-2028, has regard for the draft National Waste Management Plan for a Circular Economy 2023-2030, the National Planning Framework, the Regional Spatial and Economic Strategy 2020-2032, national 'Climate Action Plans and the Government's 'A Waste Action Plan for a Circular Economy</p>



Chief Executive’s Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>stated as a big contributor to GHGs and it was requested that more natural structures be used where possible and/or building materials be reused.</p>	<p>2020–2025’ - all of which endorse a transition towards the principles of a circular economy, facilitating the use of materials at their highest value for as long as possible and then recycling or reusing them at the end of their service life.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan</p>
<p><b>Issue Title</b> Energy efficiency measures</p>	<p>a. Submissions raised the issue of how the share of renewables in Council’s energy consumption will be reduced and that solar PV panels be installed on ALL public buildings and others in Council control.</p> <p>b. The absence of a mention of the relationship between heights of new buildings and their carbon emissions was noted.</p> <p>c. It was requested that clear guidance be provided for the implementation of energy efficiency measures in privately owned residential protected structures.</p>	<p>a. <b>CE Response:</b> A desktop study has been carried out to consider which Council buildings are suitable for solar PVs. Installations will proceed on a case-by-case basis as funding allows.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p> <p>b. <b>CE Response:</b> The discussion of building height versus carbon emissions is beyond the scope of the Draft Plan.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p> <p>c. <b>CE Response:</b> The enhanced thermal performance requirements (Part L) of the Building Regulations do not apply to buildings included on the Record of Protected Structures. Notwithstanding such</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>exemptions, the Council recognises the need to improve energy efficiency, provided that the retrofitting of energy efficiency measures does not harm or compromise the special interest of the Protected Structure. Section 11.4.1.5 Policy Objective HER11: Energy Efficiency of Protected Structures of the County Development Plan states that it is a Policy Objective to have regard to the Department of Environment, Heritage and Local Government's publication on 'Energy Efficiency in Traditional Buildings' (2010) and the Irish Standard IS EN 16883:2017 'Conservation of Cultural Heritage - Guidelines for Improving the Energy Performance of Historic Buildings' (2017) and any future advisory documents in assessing proposed works on Protected Structures.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> District heating</p>	<p>a. Submissions offered the option of collaboration in relation to district heating where heat recovery from the wastewater network and wastewater treatment plants could potentially become a heat source for district heating.</p> <p>b. The need for the Council to really focus much more on collective solutions in the energy</p>	<p>a. <b>CE Response:</b> The option of collaboration with Uisce Éireann in relation to district heating is noted, and the Council is open to engagement with Uisce Éireann in this regard.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p> <p>b. <b>CE Response:</b></p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>sector, such as communal/district heating was raised, specifically in terms of heating systems in apartment blocks becoming independent from fossil fuels. Submissions stated that more ambition in plans to roll out district heating in private and public buildings of all types would be welcomed.</p>	<p>Section 3.4.2.6 Policy Objective CA15: District Heating of the County Development Plan states that it is a Policy Objective to support the development of district heating networks and the utilisation of waste heat recovery in the County as a renewable or low energy resource which can contribute to the transition to a low carbon climate resilient County. The Planning Authority will develop a Council-wide District Heat policy following the forthcoming National Policy Framework for District Heat. Codema, on behalf of the Council, has carried out a feasibility assessment for district heating to identify local waste heat sources in the County and the Council is leading by example with the inclusion of a district heating system for the 597-unit housing scheme at Shanganagh in collaboration with the Land Development Agency.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Retrofitting and climate action potential</p>	<p>a. Submissions raised the issue of the need to have an ambition to retrofit all Council housing stock by 2030 to above C3 (or at a minimum with attic insulation) and to accelerate the retrofit programme.</p> <p>b. In addition to operational emissions, it was recommended that projects should</p>	<p>a. <b>CE Response:</b> The issues raised regarding retrofitting all Council housing stock by 2030 is noted - delivery of this ambition is conditional on the Council receiving external co-funding.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p> <p>b. <b>CE Response:</b></p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>consider whole life carbon emissions, resource efficiency and Nature-Based Solutions (NBSs). It was suggested that in addition to capturing BER information, the 'Build Upon Energy Renovation Framework' could be used to capture data on the environmental, social and economic impacts of energy upgrades.</p> <p>c. Also noted was that biodiversity-inclusive designs for social housing could leverage the county's response to the housing crisis to promote ecological sustainability.</p> <p>d. Submission suggested there should be an action to support Approved Housing Bodies and Multi-Unit Developments in retrofitting their buildings and that the Plan should provide direction on the Council's role as a leader with such bodies including how it will share its best practice knowledge with organisations who manage multi-unit developments.</p> <p>e. It was advised that those responsible for building and retrofitting should regard the importance of ventilation and requested that</p>	<p>Submission is noted and the use of the 'Build Upon Energy Renovation Framework' will be considered by the relevant Council Departments.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p> <p>c. <b>CE Response:</b> The submission is noted, and the Council considers biodiversity inclusive options when designing social housing and advocates such in developments not designed by the Council.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p> <p>d. <b>CE Response:</b> The Council hosts site visits and gives presentations on best practice around low energy design of retrofit and new build projects. The SEAI website also hosts case studies of successful retrofit projects from across the country.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p> <p>e. <b>CE Response:</b> Ventilation is an option for building designers and developers as part of a suite of options</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>a policy be created around this. It was also recommended that cooling be assessed as part of the potential need for social housing retrofits particularly for housing that supports older people who are most vulnerable in the context of heatwave events.</p> <p>f. Submission asked that there be an action to support retrofitting for vulnerable households at risk of fuel poverty.</p>	<p>available to meet the Building Regulations and building performance. The Council does support the use of ventilation systems in buildings as the benefits are positive for energy performance and air quality when operated correctly.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p> <p>f. <b>CE Response:</b> Each year, a target is set for the Council under the Department of Housing, Local Government and Heritage's Energy Efficiency Retrofitting Programme (EERP) which aims to retrofit local authority housing stock to a B2/Cost Optimal BER, with funding allocated to complete the required works. 229 Council owned properties have been retrofitted under the EERP between 2021 - 2023.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan</p>
<p><b>Issue Title</b> Reducing emissions from Construction</p>	<p>a. Submission encouraged the Council to get involved in the Irish Green Building Council's current work to develop a national methodology to assess whole life carbon emissions (Indicate project, supported by SEAI).</p>	<p>a. <b>CE Response:</b> The issues raised are noted. The Council has a role in climate change advocacy and participation where appropriate and continuously reviews its role in initiatives. Consideration will be given to participating in the Indicate project.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>b. It recommended that in creating a 'Green Building Neighbourhood' (EB20) the Council also look at addressing whole life carbon, transport emissions, circularity and at actions to protect and enhance biodiversity. A useful approach could be 'the use of structural materials that have low to zero embodied energy and CO2 emissions is encouraged' - but with embodied energy replaced by whole life cycle carbon emissions from all stages of the material's life. This would include maintenance, demolition and disposal emissions (not just the emissions released in the manufacturing, transport, assembly and construction stages).</p>	<p>b. <b>CE Response:</b> Action EB20 is for the purpose of fulfilling commitments made in the Probono project. The Action does not intend to change the scope of that project. The Council is supportive of the ambition to move towards whole life carbon emissions assessment.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Training and Awareness raising</p>	<p>Submission welcomed Action (EB28) but would encourage the Council to work with the Irish Green Building Council and the Technological University of the Shannon and further engage with the public through open house types of events. Piloting a physical one-stop-shop where people can access the information was regarded as a useful method to deliver this action.</p>	<p><b>CE Response:</b> The issues raised are noted and an amendment to Action C20 to include the term 'workshops'.</p> <p>As part of the Energy Team's public communications work, an energy awareness event was held under the title 'How to be Energy Smart at Home'. The event was part of the Open House Dublin festival of architecture with a panel featuring the Manager of ESB Networks Smart Meter Programme; Codema, Dublin's Energy Agency; the Sustainable Energy Authority of Ireland (SEAI); and the Commission for the Regulation of Utilities (CRU).</p> <p>Zero Emissions Building (ZEB) Summit.</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>On 21 November the Council &amp; MosArt announced the launch of the ground-breaking Zero Emission Buildings (ZEB) Summit. This event is scheduled to take place on 21 and 22 February 2024 and will provide insights as we work together to build a world without carbon emissions. A workshop on the 21 February 2024 will take place in County Hall and will entail a detailed interactive study of our Shanganagh housing scheme. For more information on the Summit, visit Homepage - ZEB Summit. Such events are ongoing.</p> <p><b>CE Recommendation</b> Action C20 wording to be amended as follows: 'Promote energy awareness within the county and the Council including workshop type events.'</p>
<p><b>Issue Title</b> Displaying Energy Certificates</p>	<p>Submission suggested an enforcement action to identify buildings which are required to display energy certificates, and which don't currently have them.</p>	<p><b>CE Response:</b> Assisted by Codema the Energy Team ensures that DEC's are prepared for any building &gt;250m<sup>2</sup>, which require <b>Display Energy Certificates (DECs)</b> under the Regulation S.I. 243 of 2012. These are sent to the various building managers to publicly display. These Regulations apply to public buildings only.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Lack of targets and timeframes in the Draft Plan</p>	<p>Submissions concerned about the lack of numerical targets and specific timeframes attached to the listed actions at the end of</p>	<p><b>CE Response:</b> The Draft Plan has clear targets set out on page 17 including 50% improvement in the</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>the chapter and gave examples in terms of how many housing units owned by the Council will have energy upgrades (EB9), how big an increase would there be in the proportion of renewable energy consumed in Council operations (EB6) and the lack of clarity of the targets in the Energy Efficiency Retrofitting Programme. EB9 was also cited as an example of the lack of SMART indicators in the Plan – it has no target numbers and nothing to measure against. It was stated that the Plan would be 'more convincing if there were some actual targets; as it stands, it is all very aspirational, nothing that the public can point to in holding the Council to account, and nothing that it can get behind and support.' Submission expressed a desire for more ambitious targets.</p>	<p>Council's energy efficiency and 51% reduction in the Council's greenhouse gas emissions by 2030. Achieving these targets requires in-depth action across the Council's buildings, operations, services and functions. The achievement of some of the individual actions will be subject to central government funding which is also committed to these improvement targets. It is also worth noting there may be more climate improvements available in some areas (Actions) than others, but the net effect will be the achievement of those high-level targets.</p> <p>The Energy Performance Officer is responsible each year for reporting data to the SEAI who publish an annual report that gives visibility to the public. The Council is certified to the Energy Management System ISO 50001 which focuses on making continuous improvements to the Council's significant energy users.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Use of natural materials in buildings</p>	<p>Submission raised the issue of the use of concrete and the need for more use of natural materials in buildings.</p>	<p><b>CE Response:</b> The issues raised are noted and the Council in its construction projects endeavours to use natural materials where possible having regard to the Building Regulations and structural soundness requirements. As whole of life carbon assessments become more common the use of natural materials will likely increase.</p>



Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Timeframes of intentions out of step with reality of Climate Change</p>	<p>Submission asked for more acknowledgement that some of the timeframes e.g. on improving housing energy ratings, are being outpaced by the speed with which climate change is happening and stated that the timeframe of intentions in this chapter is out of step with the actual timeframe of increasingly rapid climate change.</p>	<p><b>CE Response:</b> The issues raised are noted. The Draft Climate Action Plan has clear targets set out on page 17 including 50% improvement in the Council's energy efficiency and 51% reduction in the Council's greenhouse gas emissions by 2030 which are in line with national climate change targets as framed by the Climate Action and Low Carbon Development (Amendment) Act 2021, and the National Climate Action Plan 2023.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Council Structures</p>	<p>Submission noted the reference to a cross-departmental Energy Team and a Climate First Team but wondered how they related to the Climate Action Team and requested that the Plan include an organisational chart to facilitate citizens understanding of and interaction with the Council.</p>	<p><b>CE Response:</b> The organisation of staff and teams can change over the lifetime of the Draft Plan and therefore, is not included. While the monitoring of the delivery of the Actions in the Plan will be carried out by the Climate Teams the actual delivery of Actions is an organisational wide endeavour. The listing of Lead Department(s) for each Action in Chapter 5 designates which Department(s) has been assigned to deliver each of the Actions.</p> <p><b>CE Recommendation</b> No change to the Draft Plan</p>
<p><b>Issue Title</b> Solid fuels</p>	<p>Submission requested an action around the Council's role as regulator of the sale of solid fuels to limit their sale and burning in the county.</p>	<p><b>CE Response:</b> The Council will implement the Regulations regarding the sale of solid fuels as they apply.</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b></p> <p>Support Scheme for non-profits, the community sector and sports clubs.</p>	<p>Submission recommended an action be included to develop a support scheme for non-profits, the community sector and sports clubs to manage their energy use and retrofitting with an emphasis on helping them to understand the grants and benefits available and possibly offering a small grant for energy assessments.</p>	<p><b>CE Response:</b> The issues raised are noted and an amendment to Action C20 to include the term 'workshops' so the public, including community sector and sports clubs, can understand the grants and benefits available to them.</p> <p>The Council currently provides a bridging loan facility to Sustainable Energy Communities for the preparation of an Energy Master Plan. Sporting clubs and communities can avail of this if a part of a sustainable energy community entity.</p> <p>As part of Open House Dublin each year the Architects' Department includes events with an energy focus e.g. in 2023 the Patrician Villas Community Centre was open for tours to explain how they have upgraded their Centre and what grants they accessed. Also, each year the Council holds information sessions for the public or groups in advance of the Council grant deadlines.</p> <p><b>CE Recommendation</b> Change to the Draft Plan to amend the Action C20 wording as follows: 'Promote energy awareness within the county and the Council including workshop type events.'</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> Businesses reporting and participation in Green Business Courses</p>	<p>Submissions requested that there should be a specific action around increasing participation at green business courses /initiatives run by the Local Enterprise Office and that R7 Tracking measure shouldn't just be the number of businesses supported, but the emissions reductions achieved. This could usefully be tracked against the 51% target to evaluate how well the sector is responding. There should be a programme to promote the idea of businesses measuring and reporting on their own emissions, at least scope 1 and scope 2, and a tracking measure of the percentage of dlr-based businesses which are doing this. This may usefully be linked into green public procurement. More preferably, these and other measures for businesses should merit their own chapter.</p>	<p><b>CE Response:</b> The issues raised are noted. The reality is that despite the significant marketing and promotion of climate action initiatives and programs already undertaken national and international experience shows that uptake is still at a low level - increasing it may require participation to be mandated by central government. The Council plans to engage with public sector bodies and businesses in the DZ to understand their decarbonising plans and find synergies and opportunities that could be rolled out county wide during the lifetime of the Draft Plan to enable the enterprise sector to meet its sectoral target of reducing emissions by 35% by 2030. The Local Enterprise Office promotes programmes and supports offered by Enterprise Ireland, Sustainable Energy Authority Ireland, Uisce Éireann, Skillnet Ireland and Central Government to build capacity in businesses to both achieve and report on their emissions reductions.</p> <p><b>CE Recommendation</b> No change to the Draft Plan</p>
<p><b>Issue Title</b> Public lighting</p>	<p>a. Submission would like to see a replacement programme in relevant housing estates, towns and villages of the overbright lights installed to replace the previous sodium lamps and wondered if it is necessary for the full array of lights on suburban streets to burn all night as for biodiversity reasons this is devastating.</p>	<p>a. <b>CE Response:</b> There are only three lighting regimes allowed for unmetered lights. 24-hour, dusk to dawn, dusk to midnight. No other is allowed under current CRU (Commission for Regulation of Utilities) regulations. No part night or motion sensor lighting is possible on unmetered</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>b. It was suggested that for action EB19 the wording be changed to 'increase public lighting using high efficiency /LED lighting while ensuring the lumen levels and spectral change are maintained or reduced/controlled, and adequate shielding is used to avoid effects to biodiversity and minimise light pollution'.</p>	<p>lighting of which over 90% of lights exist as.</p> <p>b. <b>CE Response:</b> LED lights installed in the county have full horizontal cut-off to remove all upward light, thus significantly removing sky glow and light pollution above the horizontal. The light levels on the road surface are lower than under the sodium lighting but because they use the full human light spectrum, they appear brighter. For birds, insects and some other animals, the removal of the UV part of the light (which was a large component of sodium lighting) makes the environment appear much darker and is much better for them and their diurnal cycle. Any obtrusive light into specific windows can be resolved with baffles on the lanterns if requested directly from the Council.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Incentivising Community Energy Projects</p>	<p>Submission requested that the Climate Action Plan include actions which incentivise community energy projects - community based projects, organisations and social enterprises in the energy sector owned and operated by local people and the Council. It also suggested adding actions which would facilitate local communities/organisations to invest in their own renewable energy</p>	<p><b>CE Response:</b> The issues raised are considered adequately catered for by the provision of the Community Climate Action Programme.</p> <p>As part of Open House Dublin each year the Architects' Department includes events with an energy focus e.g. in 2023 the Patrician Villas Community Centre was open for tours</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>infrastructure through providing expertise and financial incentives or support.</p>	<p>to explain how they have upgraded their Centre and what grants they accessed. Also, each year the Council holds information sessions for the public or groups in advance of the Council grant deadlines.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Passive Housing Standard</p>	<p>The submission requested that the Council take a lead by encouraging more people to build properties to Passive House standard and inserting the higher standard (than NZEBs) in the next County Development Plan. The County Development Plan 2022-2028 highlights support for new buildings to achieve Passive House or Net Zero Carbon design standards and the submissions asks to what extent will this support translate into firm requirements and action for all new buildings in the area. It was stated that the language used allows the Plan to look good, without committing to anything specific e.g. in action EB13 that passive design is to be aimed towards is obviously very welcome; but again, to 'seek to achieve' certain standards is not a plan, but it is an aspiration.</p>	<p><b>CE Response:</b> The issues raised of changes to the next County Development Plan and specific details around the requirement for Passive House standards are outside the scope of the Climate Action Plan.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Educating the public on renewable energy</p>	<p>A small tidal demonstration project could be installed as an art piece to educate the public on renewable energy, or the Harbour /Bay could be used as a small-scale testing area for renewable energy companies provided it didn't interfere with the biosphere.</p>	<p><b>CE Response:</b> The suggestion is noted. The Council is open to exploring any climate improvement or awareness project that can be delivered.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>

<p><b>Issue Title</b> Modifications to E&amp;B Actions</p>	<p>These changes to the draft Plan were proposed to improve Actions in relating to Energy and Buildings</p>	<p><b>CE Response:</b> The following recommendations will improve the Plan</p> <p><b>CE Recommendation</b> Action EB8 to be altered to include <b>Infrastructure and Climate Change (including Road Maintenance and Traffic)</b> as a 'Lead Directorate'.</p> <p>Action EB9 to be altered to include the additional text into the 'Tracking Measure' as follows: 'The number of energy <b>and decarbonisation</b> upgrades carried out through the Energy Efficiency Retrofitting Programme (EERP). Note B</p> <p>Action EB9 to be altered to delete(red) and include(green) text as follows in 'Lead Directorate' <del>Architects/ Energy Team</del> <b>Corporate Affairs (including IT and Human Resources) and Infrastructure and Climate Change (including Road Maintenance and Traffic)</b></p> <p>Action EB9 to be altered to include <b>Architects/Energy Team and Codema</b> as 'Partner(s) Identified'. Action EB17 to include <b>Codema</b> as a 'Partner(s) Identified'.</p> <p>Action EB18 to be altered to include <b>Codema</b> as a 'Partner(s) Identified'.</p> <p>Action EB21 to be altered to include the additional text into the 'Tracking Measure' <b>energy use and decarbonisation</b></p> <p>Action EB21 to be altered to include <b>Corporate Affairs (including IT and Human Resources)</b> as a 'Lead Directorate'.</p>
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Chief Executive's Report on Submissions Received

		<p>Action EB25 to be altered to include Corporate Affairs (including IT and Human Resources) as a 'Lead Directorate'.</p>
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### 5.5.2 Transport

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> Measures supporting Active travel</p>	<p>Submissions raised the issue of cycle training in relation to cycle bus for schools, more 30km speed limits, more zebra crossings and requested that the roll out of active travel measures be continued as only once routes are connected will most people use them. The need for easy connection between public transport modes was also mentioned and that bike rental schemes should appear to the end-user as a single network rather than a patchwork of apps/accounts irrespective of how many companies provide bikes. The need to create more bike rental spaces and the huge scope for more bike parking at the expense of on-street car parking was noted. There was a request for Barnhill Road to be made one way to accommodate a cycle lane for local schools and the coastal mobility route to be extended to White Rock and to have more living streets. There was also a request for a cycle lane on Mount Anville Road.</p>	<p><b>CE Response:</b> The issues raised are addressed under Actions T1, T10, T11, T13, T14 T16, and T17. Connections between public transport modes is outside the remit of the Council but in its role as influencer it will advocate for easier connections between transport modes. Suggestions are noted.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Remote Working</p>	<p>Submissions raised the issue of more working from home being encouraged and that the Climate Plan needed to recognise the continuing need for car usage for many people, and particularly for people that live rurally and commute for work.</p>	<p><b>CE Response:</b> The issues raised would be a matter for individual employers and employees and outside the remit of the Council.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Projection for expanding population</p>	<p>Submission raised the need to make projections for food delivery for an expanding population as there is mention of reducing freight KM within the DZ.</p>	<p><b>CE Response:</b> The main objective of the DZ is to find innovative but achievable ways to reduce greenhouse gas emissions. Different approaches and projects including freight</p>



Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>logistics planning improvements, 'avoid' measures and the feasibility of vehicle/fleet electrification will be tested and perfected in the DZ over the lifetime of the Draft Plan.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Public Transport and Bus routes</p>	<p>Submissions raised the issue of improved bus routes needed to service UCD. Request was made for provision of dedicated school buses to service all schools. Submission stated the need for more buses and fewer 'ghost buses' and more connections between transport options. It was noted that people won't shift to public transport if the transport system is unreliable or overloaded and the connections between the west and the east in Dublin is so poor. Submission suggested the Council use its leadership role and advocacy experience to continue to argue with Government and public transport providers to make public transport much cheaper or free to use. It was also suggested that local electric buses be used to facilitate travel between the outskirts of towns and the businesses/public facilities in them and that there be a plan to pilot a town bus to Dún Laoghaire, linking the public transport nodes with residential areas and destinations. Submission requested consideration be given to making the Dart/Bus free one day per month to increase the uptake of public transport.</p>	<p><b>CE Response:</b> The issues raised are addressed under Action T15. The designing of bus routes is a matter for the National Transport Authority. Bus Éireann delivers the School Transport Scheme on behalf of the Department of Education so this is outside the remit of the Council. Bike rental schemes are addressed under action T11.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> E-scooters, EVs and EV charging points</p>	<p>Submissions were opposed to e-scooter promotion/rental due to lack of regulation.</p>	<p><b>CE Response:</b></p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>Request that e-scooters are not permitted on cycle lanes. Submission stated that EVs are only a concept at this stage which if commercially viable would be adopted without government intervention. Submission suggested that in addition to (T7) could there be an action to implement the Greater Dublin Area EV Charging Strategy 2022-2030. Submission stated that plans for public EV charging infrastructure is great to see - possibly at Blackrock Dart Station and Park and Ride lots and that Escooter/Ebike charge points could work well on Dart and Luas platforms to support their use in first and last mile commutes and keeping more cars out of commercial areas. Submission stated that enablers to encourage modal shift may include provision of secure bike parking facilities and bike charging points to trigger more active travel.</p>	<p>The Road Traffic and Roads Act 2023 will allow for legislation to be drafted regarding escooters.</p> <p>The Council, in conjunction with the other three Dublin Local Authorities has developed the Dublin Local Authority Electric Vehicle Charging Strategy (2022-2030) to support the transition to electric vehicles. It sets out the Local Authorities role in facilitating a co-ordinated approach to the deployment of EV charging infrastructure. Work has begun on implementing the strategy and will continue under the Climate Action Plan.</p> <p>The provision of EV charging networks is addressed under Action T7 - the interest in having such infrastructure at Blackrock Station and installing ebike/scooter charging at Luas and Dart Stations is noted.</p> <p>Action T13 addresses the expansion of secure bike and scooter parking.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Targets</p>	<p>Submissions raised the need for specific reduction targets for the number of cars removed from roads in the county and specified that measures to do this could include encouraging home office schemes, sustained and continuous public awareness campaigns about the need to reduce car use and ownership, providing alternative public transport when the DART is closed and</p>	<p><b>CE Response:</b> The National Transport Authority has established modal share targets. Mode share is usually measured using the census undertaken by the Central Statistics Office and as such is not measured year on year, so it is not an appropriate KPI to use for this Draft Plan.</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	engaging with government about the need to de-grow the auto industry.	<p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Guidance Documents</p>	<p>Submission stated that <b>Note A</b> is not explicitly mentioned in Actions T13 and T21 and needs to be and that T15 needs to be added to the list of actions under <b>Note A</b>. Another note - <b>Note (B)</b> needs to be added indicating that wherever possible the guidance from DMURS (Design Manual for Urban Roads and Streets), in particular Advice Note 5 - Road and Street Drainage using Nature Based Solutions' and DHLGH Document 'Best Practice Guidance Document on Nature Based Solutions to the Management of Rainwater and Surface Water runoff in Urban Areas' will be used.</p>	<p><b>CE Response:</b> Note A on Actions T13 and T21 were omitted in error.</p> <p>The Council in carrying out its duties and in the implementation of schemes in relation to transport in the county have regard to all relevant guidelines including DMURS where appropriate. This is an inherent part of the Council's work.</p> <p><b>CE Recommendation</b> Note A (text 'Having due regard to environmental sensitivities such as receiving water environment, biodiversity, European sites local air quality and cultural heritage.') to be included in Actions T13 and T21 on pages 64 and 65. Note A on page 66 to include the text <b>Actions T13 and T21.</b></p>
<p><b>Issue Title</b> Road Safety</p>	<p>Submissions raised the issue that cycle lanes are mostly not safe and certainly not continuous and the need to give cyclists and pedestrians priority over motorists and to reduce the number of cars to encourage active travel. As well as better cycle lanes, there is a need for reduced and enforced speed limits. Rules are needed on cyclists/scooters overtaking on cycle lanes. Need clear signage to show right of way to prevent drivers cutting off cyclists when making left turns. Speed bumps are needed on approaches to all junctions and</p>	<p><b>CE Response:</b> The issues raised are addressed under Actions T1 and T14. The Council carries out an annual light up your bike campaign in conjunction with member of the dlr Cycle Forum.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>pedestrian crossings. Cyclists should not have to share pedestrian crossings with pedestrians. Cycle crossing use needs to be communicated to all road users. Cornelscourt Hill, Glenamuck Road Lower and Glenamuck Road Upper need to be made safer for active travel. The speed limit on N11 needs to be reduced and traffic calming measures installed on Brennanstown Road as these roads are dangerous for cyclists. Old Bray Road (at Cabinteely Park) is also dangerous for cyclists due to parked cars. Need to replace all counter-sunk drains - are dangerous for non-standard bikes.</p> <p>Submission asked if there could be an action to 'Improve pedestrian safety by widening footpaths, building out current sweeping curves etc' rather than simply using signalised pedestrian crossings (T17) and to 'Expand the number of junctions where pedestrians have priority crossing, through raised continuous footpaths, zebra crossings, etc. Submission asked that more consideration be given to the safety of people using active travel modes particularly in the evening and in relation to women and vulnerable people and that there be better lighting at Luas, DART and bus stops and at bike racks. It also asked for more co-ordination with An Garda Síochána and other relevant security officials (on transport) to ensure safety of those using bikes, public transport or walking. The submission requested that the Council organise campaigns annually encouraging cyclists to</p>	

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>be visible when the afternoons/evenings get darker, and that more investment be put into regular footpath inspection and maintenance to ensure pedestrian safety.</p>	
<p><b>Issue Title</b> Supporting co-benefits of transport mitigation measures</p>	<p>Submission raised the issue of the need to consider rates increase for businesses providing free parking in retail parks to support small independent shops. Submission raised the issue of the impact of goods transport and the related potential for a circular economy to reduce this impact - an Avoid opportunity. Actions related to avoiding goods transport and better urban planning should be included in the Plan.</p>	<p><b>CE Response:</b> Rates bills for each ratepayer are calculated in accordance with a formula set out in rating legislation, based on the valuation of the property determined by Tailte Éireann and the Annual Rate on Valuation determined by the Council at the Annual budget meeting. There is no discretion for the Council to deviate from this calculation.</p> <p>The establishment of the transition team for the DZ comprising of representatives from the local community, business, transport, and energy sectors and others to co-create an Action Plan is likely to result in many proposals and opportunities to pilot projects or approaches for decarbonising the county including in relation to the impact of goods transport and the potential for a circular economy to reduce this.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Travel options/demographics/abilities</p>	<p>Submission raised the issue of the older demographic in the area and the weather not being suitable for cycling or bus journeys. Concern was raised as to how the asserted aim of making active travel modes available to people of all ages and ALL ABILITIES would be realised in practice (other than in one of the new bikes driven by volunteers at</p>	<p><b>CE Response:</b> Within a 10-minute neighbourhood the vision is that the facilities are available for whichever mode people choose and that the infrastructure is set up in a way that makes this option safe and attractive. Designing facilities that provide segregation between modes and are of suitable widths provide for</p>

Submission	Submission Summary	CE Response and Recommendation
	<p>the Bike Hub) even in a 10-minute neighbourhood and there is little mention of special needs in the Plan. Submission asked how elderly, frail and vulnerable people can use public transport more and wondered if adaptation of buses is needed. It noted that consideration should also be given to citizens with mobility issues, wheelchairs and buggies to encourage more use on footpaths. Submission suggested the Council be innovative in its approach to active travel at schools and make schools active travel hubs (or even pilot it in a couple of schools) and should dedicate an acre to create a cycling training park facility in one of the public parks so children and parents could practice there. Submission suggested making footpaths more friendly and road-crossings safer for prams and wheelchairs and covering sections of footpaths with solar pv canopies.</p>	<p>those with disabilities or special needs. For example, if someone chooses to cycle, they can do this without having to interact with vehicles at junctions. Segregated infrastructure provides reassurance that the route is safe. In relation to pedestrians, ensuring frequent signalised crossing points are available as well as step free /at grade crossings are provided, supports those with visual or mobility impairments.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Protection and renewal of road infrastructure</p>	<p>The draft Plan should include an action to reflect the implementation of action TR/23/32*(TF) - Leverage of Protection and Renewal of road infrastructure programme to enhance safety of sustainable mobility users and action TR/23/29(TF) Advance roll-out of 1,000 km walking/cycling infrastructure in the national Climate Action Plan 2023. Suggest this could be accomplished by expanding T20 to include identifying opportunities and upgrading the existing road and footway network in the county.</p>	<p><b>CE Response:</b> Action T20 will be revised with these suggestions incorporated into it to enhance the safety of active travel users.</p> <p><b>CE Recommendation:</b></p> <p>The wording of T20 to be altered to read 'Identify opportunities to upgrade the existing road and footway network to mitigate damage due to weather events and to provide new footpaths'. The wording of tracking measure to be altered to: 'Length of existing road network upgraded. Length of</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>footway repaired.' The wording of timeframe to be altered to read '2024 and annually thereafter'. 'Both' to be replaced with 'Adaptation'.</p>
<p><b>Issue Title</b> Embedding Low Carbon Transport Modes, Road Safety and Accessibility in Communities.</p>	<p>Submission requested that the Council ensure all new homes are delivered in walkable areas with good access to public transport and car sharing schemes and suggested making use of the Sustainable Location Indicators in the Home Performance Index Certification. In relation to delivering Action T23, the submission encouraged the Council to look at PAS2080 as it regards the whole life carbon impact of infrastructure (including impact on transport).</p>	<p><b>CE Response:</b> The Council develops social housing based on the land in our ownership, but we have the flexibility to determine the intended beneficiaries based on the location. For instance, we may develop accommodations specifically for older persons that is close to essential services. The Council endeavours to make developments accessible to public transport and within walkable areas as much as possible, nevertheless a factor influencing the decision is whether the land is already serviced or still in need of infrastructure development. The County Development Plan also plays a significant role in sustainable housing development in the county and the Council will continue to monitor and be mindful of best practices available in meeting climate change challenges.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Plain English and Communications</p>	<p>Submissions asked what does T9 mean, how many separate public bodies will be involved in planning transport for the county and how will active travel integrate with public transport? It also noted that T13 is very non-specific and T1 gives no info. On the estimated total km required. The submission</p>	<p><b>CE Response:</b> With regards to T9, permeability for the purpose of this Plan, describes the extent to which an urban area permits the movement of people by walking or cycling. It does not relate to the movement of motorised vehicles and is therefore concerned with</p>

Submission	Submission Summary	CE Response and Recommendation
	<p>suggested that an action be added for a communications exercise highlighting the new safe routes to school, the new segregated cycles ways etc, with maps and that the Council should also have a Plan for the 5 years of communicating the benefits of the active travel network with the general public, recognising that the support of those who may not use the network is important in its delivery. The Plan should include all of the active travel, Living Streets, Safe Routes to School and similar projects that are targeted to be completed, under construction or approved during the lifetime of the Plan. Submission stated that active travel is an easy win which must be communicated to everyone so even those who need their cars can get behind it and understand the need for one-way systems. The actions and tracking measures in this section are quite general and vague and therefore are difficult to comment on. Submission said that on page 57 Transport is 49.5% emissions - Figure 3.4 (Page 30) it is 41% - a note clarifying the difference would be helpful. Submission suggested the Council survey those who don't take public transport and explore policies to address the reason why</p>	<p>providing a competitive advantage to walking and cycling over these modes.</p> <p>The transport emissions of 49.5% reported on page 57 is a typo and will be corrected to read 41%, as per page 30.</p> <p>The issues raised regarding communications on the Active Travel Network in the county is addressed under Action T2. In 2021, the Council launched an interactive online map that shows all the walking and cycling routes across the county.</p> <p>Public transport usage is outside the remit of the Council; however, the Council is committed to working with the relevant transport bodies to enhance public transport options to facilitate the transition to more sustainable travel options. The NTA carries out various surveys including the National Household Travel Survey and the Customer Satisfaction survey to evaluate public transport usage in the country.</p> <p>The Council, in preparing the Draft Plan, sought to measure in a meaningful way the effectiveness of all the proposed actions listed in the Draft Plan over the timeframe of their delivery to track the progress achieved in meeting the targets set. New tracking measures may be added throughout the lifetime of the Draft Plan as further evidence is gathered to inform the development of robust and reliable sectoral indicators.</p>



Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p><b>CE Recommendation</b> Text on Page 57 to be amended so as to be consistent with Figure 3.4, Page 30 and to read 'In our county, the transportation sector is the largest contributor to GHG emissions, with an estimated 41% of total emissions.</p>
<p><b>Issue Title</b> Parking</p>	<p>Submission suggested there should be an action to target anti-social parking e.g. reduce illegal car parking on footpaths, on double yellow lines and in cycle ways, and have a target to expand the authority of parking enforcement officers to ticket illegally parked vehicles. There should be an action to increase parking compliance through enforcement, education, road design, and to decrease emissions through the implementation of parking policy that incentivises the use of low emissions vehicles and zero tailpipe emissions vehicles. Market pricing should be introduced for all Council car parks and staff car parks.</p>	<p><b>CE Response:</b> The issue raised regarding car parking on footpaths, on double yellow lines and in cycle ways is a matter for An Garda Síochána.</p> <p>The Council will be drafting a new Parking Enforcement tender in 2024 for the operation and enforcement of parking in all dlr carparks across the county. During this process we will be looking at combining a number of parking enforcement areas that will include; On-Street Managed Parking Services, Off-Street Managed Parking Services, Combined On-Street and Off-Street Managed Parking Services. Across these areas we will be looking to review market pricing, look at incentives that will seek to promote the use of public transport, the use of EV vehicles, the establishment of mobility hubs and the use of active travel across the county.</p> <p><b>CE Recommendation</b> No change to the Draft Plan</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> Greening transport</p>	<p>There should be actions to support the reduction in fossil fuel use in transport and heating and clear targets set for this. The Plan should support a much-increased number of buses on the N11 and the improvement of cycle-lane infrastructure considering the recent large increase in local residential property development.</p>	<p><b>CE Response:</b> The issues raised regarding targets for the reduction in fossil fuel use is a matter of national policy and the Council will align with those policies. The issues raised of cycle lane infrastructure improvements is addressed in Action T1 to deliver a safe active travel network including the cycle network. The issues raised of increased number of buses on the N11 is a matter for the National Transport Authority and Transport Infrastructure Ireland to consider. The Council will collaborate with the National Transport Authority and Transport Infrastructure Ireland to facilitate the development of public transport in the county over the lifetime of the Draft Plan in implementing Action T15.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>

### 5.5.3 Flood Resilience

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> Sustainable Urban Drainage (SuDs) and Nature Based Solutions for Flood Management</p>	<p>Submissions raised the issue of using SuDs in private developments and education and awareness of the public about SuDs. Submissions were in favour of SuDs and wanted to see more use of them in developments, including driveways and at infill developments. Submissions want to see the preservation of areas to provide soakage for rainfall or where altered, the best use of SuDs possible. Submissions also noted benefits of nature-based solutions in flood alleviation.</p> <p>Submissions also suggested development and implementation of a Nature Based Solutions and integrated rainwater management protocol for both Council and private sector projects and prioritise Nature Based Solutions over conventional systems in line with national guidance, such as Inland Fisheries Ireland Guidance</p>	<p><b>CE Response:</b> The issues raised regarding SuDs awareness is provided for in the Draft Climate Action Plan, specifically action C8 [page 106] in the chapter Community Engagement. This chapter details community engagement, public awareness and education work including SuDs, flooding awareness and what communities can do to limit flooding and discourage the use of hard paved surfaces. This is discussed in the County Development Plan 2022-2028 specifically section 12.4.8.3 Driveways/Hardstanding Areas and 10.2.2.6 Policy Objective EI6 Sustainable Drainage System.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Blue &amp; Green Infrastructure</p>	<p>Submissions were supportive of Blue and Green Infrastructure and its proliferation but also raised the issue of more detail on greening proposals and opportunities and a general raising of awareness to householders and developers.</p>	<p><b>CE Response:</b> The issues raised regarding SuDs awareness is provided for in the Draft Climate Action Plan, specifically Action C8 [page 106] in the chapter on Community Engagement. This can be expanded to include to blue/green infrastructure. Action N22 references the Council's Green Infrastructure Strategy which provides significant detail on Green Infrastructure ambitions for the County, in particular Chapter 4 of the Strategy.</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p><b>CE Recommendation</b>                      Wording of Action C8 to be altered to read 'Promote and encourage community involvement in the retrofit of SuDS or development of natural flood management measures 'and blue/green infrastructure' in existing housing /developments/local areas.</p>
<p><b>Issue Title</b>                      Localised Flooding</p>	<p>Submissions raised the issue of checking and maintaining drains and gullies especially before storm events.</p>	<p><b>CE Response:</b>                      The issues raised are addressed by Action F15 of the Draft Climate Action Plan. Surface water drains and critical flood gullies are known and maintained in advance of storm events. Routine maintenance of gully and drain applies throughout the year and additional maintenance and repairs are implemented when necessary.</p> <p><b>CE Recommendation</b>                      No change to the Draft Plan.</p>
<p><b>Issue Title</b>                      Sponge Parks &amp; City</p>	<p>Submissions suggested the Council explore and implement the concept of 'Sponge Park' or 'Sponge City' to make the county more flood resilient.</p>	<p><b>CE Response:</b>                      The suggestion of the sponge concept is of interest to the Council and will be investigated during the life of the Draft Climate Action Plan. Action F7 provides for schemes to resolve recurring flooding including nature-based solutions (NBS) techniques. The sponge concept will be included as one of the many NBS options in such schemes. F9 of the Draft Plan provides for urban greening opportunities for capital projects and again the sponge concept will be included as one of the many NBS options in such projects. It is considered the sponge concept is catered for in the Draft Plan under</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>the umbrella of NBS, SUDS and Dún Laoghaire-Rathdown County Council's Green Infrastructure Strategy</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Groundwater vulnerability</p>	<p>Submissions raised the issue of groundwater vulnerability and the risk of groundwater pollution from SuDS infrastructure where subsoils are thin or absent.</p>	<p><b>CE Response:</b> The issues raised can be catered for in the Draft Plan by way of reference to groundwater vulnerability when implementing SuDS and Nature Based Solutions.</p> <p><b>CE Recommendation</b> Page 71 in the section 'Implementation of Urban Greening/Nature Based Surface Water Management in the County' last sentence in paragraph two to include the additional text in green. 'For example, any future developments must incorporate measures, appropriate to the scale of the proposed development, such as green roofs, water retention, areas, permeable paving and rainwater harvesting swales that minimise water flows to the public drainage system and maximise infiltration potential <b>having due regard to groundwater vulnerability.</b>'</p>
<p><b>Issue Title</b> Water Quality</p>	<p>Submissions raised the issue of elevated nutrient levels in their local lake and stream and the need to address pollution sources</p>	<p><b>CE Response:</b> The issues raised are outside the scope of the Plan, but the submission notes that Cloisters Residents Association is collaborating with Dún Laoghaire-Rathdown County Council on the Carysfort Lake Water Health Initiative. It is expected this</p>

Chief Executive’s Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>collaboration will continue for the betterment of water quality in the area.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Role of property owners and the role of the Council in discouraging paved driveways</p>	<p>Submissions raised issue of role of property owners in flooding resilience actions.</p>	<p><b>CE Response:</b> The Draft Climate Action Plan is more outward focused when compared to the previous iteration of the Climate Action Plan from 2019-2024. A new section directly focused on community engagement projects that the Council will facilitate and support throughout the lifetime of the Draft Plan has been added. This includes Action C8 (Page 106) to promote and encourage what communities can do to limit flooding. In addition, the County development Plan 2022—2028 details the requirements for new developments with respect to flood management. Of note is the fact that the Cherrywood development has integrated SUDS throughout the site.</p> <p><b>CE Recommendation</b> The 'Planning and Economic Development (including Dún Laoghaire Harbour) Directorate and Private Landowners as Partner(s) Identified to be added into Action C8.</p>
<p><b>Issue Title</b> Flooding issues at Barnhill Road</p>	<p>Submission raised the issue of recurring flooding issues at Barnhill Road.</p>	<p><b>CE Response:</b> Submission concern is addressed by Action F7 and subject to consideration when resources are available to progress works.</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Drainage Issues</p>	<p>Stop blaming over capacity and lack of investment in gullies on climate change - use directional drilling to install large HDPE pipes to allow for pumping and separate drainage systems.</p>	<p><b>CE Response:</b> The Draft Plan does not reference over capacity or lack of investment in gullies. Action F15 addresses gully maintenance.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Section 4 discharge licence/flood schemes</p>	<p>a. Submission asked for clarification of what constitutes a 'significant' development in Action F11.</p> <p>b. It also requested that the Council seek to prioritise the delivery of Catchment Flood Risk Assessment and Management Programme identified flood schemes in the county and promote Nature-Based Solutions (NBS) as integral to these schemes and develop an NBS and integrated rainwater management protocol for both Council and private sector projects.</p> <p>c. It also asked that a review of Section 4 Discharge to Water Licences be carried out to determine if they are fit for purpose to</p>	<p>a. <b>CE Response:</b> Significant developments have no specific definition but are those proposed in areas with site sensitive needs or due to their scale areas are deemed significant - this includes an element of professional judgement.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan</p> <p>b. <b>CE Response:</b> The delivery of flood schemes is driven by the Office of Public Works, and it is noted that new schemes have increasing NBS components - the Council is supportive of this trend.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan</p> <p>c. <b>CE Response:</b> Section 4 Discharge to Water Licences reviews are mainly driven by either a change</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>meet the projected climate change related risks such as hydrological changes and water temperature increases.</p>	<p>to the process (and thus a change to the nature of the trade effluent) or by the need to address a change in environmental standards either nationally or locally. Reviews of discharge licences for surface water and groundwater undertaken by the Council follow the process set out in the Guidelines issued by the then Department of Environment, Community and Local Government. This guidance does not currently cater for the impact of climate change as per the submission. It is expected the guidance may be changed to consider the effects of climate change and any such changes will be reflected in the Council's active Section 4 Trade Effluent Discharge Licences.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan</p>
<p><b>Issue Title</b> Urban Greening</p>	<p>Submissions requested that Action F9 should not be limited to Council only development, but instead include all development seeking planning permission in the County.</p> <p>Submissions requested details on what Urban Greening proposals and opportunities look like and if they maximise elements that increase biodiversity through Nature Based Solutions</p>	<p><b>CE Response</b> Action F9 relates specifically to Council funded developments, however, Action F11 ensures urban greening is included in all significant developments in the county.</p> <p><b>CE Recommendation</b> Private Landowners to be included as Partners Identified relating to Urban Greening in Action F11</p>
<p><b>Issue Title</b> Suggestion for Rainwater management Programme</p>	<p>Submissions requested that dlr enact a rainwater management programme to educate the public to reduce the risk of pluvial flooding or drought.</p>	<p><b>CE Response:</b> This Draft Plan includes a new section directly focused on community engagement projects that the Council will develop</p>



Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>Submission also noted coastal flooding is not mentioned as a type of flooding on Page 70 though it was identified as the highest-risk climate hazard.</p>	<p>throughout the lifetime of the Draft Plan. This includes an action (C8 page 106) on flooding awareness and what communities can do to limit flooding.</p> <p><b>CE Recommendation:</b> On page 70 Coastal flooding to be added to the definition of flooding.</p>
<p><b>Issue Title</b> Suggestion for flood Plain Management</p>	<p>Submission suggested dlr develop better data collection within the county and ensure that flood plains are protected with natural space used for flood alleviation.</p>	<p><b>CE Response:</b> The Council has an adequate resource of data gathering equipment with regard to rainfall, river flows, and outfalls to sea. The Planning guidelines control building on flood plains and zones. Development is subject to Planning criteria and the Council has stringent SUDS guidance. Flood alleviation schemes (e.g. Kilbogget Park Flood Storage System opened in 2021 which allows water to build up safely in the wetlands in heavy rainfall) result in a slower release of water thus protecting surrounding properties from flooding.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>

### 5.5.4 Nature-based Solutions

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title:</b> Biodiversity in social housing developments.</p>	<p>Submissions raised the issue of biodiversity inclusive design for social housing.</p>	<p><b>CE Response:</b> Submission noted. Biodiversity inclusive design will be addressed through delivery of Action N11 of the Draft Climate Action Plan which will be expanded to include social housing developments</p> <p><b>CE Recommendation</b> Wording of Action N11 to be revised to read 'Develop guidance on biodiversity inclusive design for housing development including social housing with green roofs, wetland &amp; pond SuDS, green carparking, nest boxes, local soil and seed for landscaping, and wildlife friendly shrubs and native trees.'</p>
<p><b>Issue Title:</b> Wildflower corridor and biodiversity mapping</p>	<p>Submission suggested Action N6 should be changed to read 'the Publication of the Wildflower Corridor Plan' as the action and the tracking measure should be its implementation. Submission asked for the increasing of biodiversity coverage in the county.</p>	<p><b>CE Response:</b> The issues raised are noted. It is considered Action N6 provides clarity around the annual review of wildflower corridors and strengthens this process by its specific inclusion within the Draft Climate Action Plan. Biodiversity mapping is addressed through the provision of the dlr Ecological Network which contains all the identified wildlife corridors in the county, and which is referenced in the County Development Plan 2022-2028. Action 3.4, 3.5 and 3.6 of the dlr Biodiversity Action Plan 2021-2025 adequately address the request for exploring and promoting the increase of biodiversity coverage in the county.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title:</b> Proliferation of green spaces for biodiversity</p>	<p>Submissions raised the issue of the proliferation of green spaces and green practices, including at abandoned houses and the need for more emphasis on protecting natural ecology and native species. Submissions also supported the 'greening' of our towns and villages and the protection of existing meadows with some locations suggested.</p>	<p><b>CE Response:</b> The issues raised are noted and addressed through the implementation of the County Biodiversity Action Plan 2021-2025, the proposed action N5 of the draft Plan and the adapted dlr Tree Strategy. The issue of green spaces at abandoned houses is adequately covered in the draft Plan for Council owned properties and is beyond the remit of the draft Plan for private owned properties.</p> <p>The Council will continue to encourage the public to allow meadows to develop in spaces that are appropriate and also provide encouragement and information on managing private gardens for pollinators.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title:</b> Accreditation of Garden Centres for being pesticide and peat free.</p>	<p>Submissions raised the issue of accreditation of Garden Centres for being pesticide and peat free and also working with local garden centres in a creative way to encourage them to go peat- free and pesticide-free and award certificates to those who do this.</p>	<p><b>CE Response:</b> The Council is not an environmental accrediting authority, so the request is outside the remit of the Draft Plan. However, businesses could demonstrate their credibility by entering for awards honouring best environmental practices or signing up to green charters e.g. the Dublin Bay Biosphere as part of its Biosphere Charter for businesses in the Biosphere <a href="https://www.dublinbaybiosphere.ie/business-charter/">https://www.dublinbaybiosphere.ie/business-charter/</a></p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> Goat grazing and wildfires.</p>	<p>Submissions raised the issue of using goat grazing in areas subject to wildfires to suppress vegetative growth.</p>	<p><b>CE Response:</b> A pilot goat grazing project is planned for Killiney Hill in January 2024 as part of the Killiney Hill Wildfire Strategy 2023 and will be expanded to other areas in relation to wildfires and conservation grazing where appropriate.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Community Gardens and allotments</p>	<p>Submissions raised the issue of the promotion of community gardens and allotments as well as provision of more areas for their development.</p>	<p><b>CE Response:</b> The issues raised are addressed in Action N25 and commits to the expansion of community gardens. Community gardens are the Council's preference rather than more allotments (other than those in Goatstown and Shanganagh) and locating a Community Garden in Cabinteely Park is under consideration currently. The Council will commit to reviewing, in collaboration with Community Gardens Ireland, all Council owned land for the purpose of developing community gardens over the life of the Draft Plan and to engaging with Community Gardens Week.</p> <p><b>CE Recommendation</b> Change to be made to Action N25 to include <b>Community Gardens Ireland</b> as an Identified Partner.</p>
<p><b>Issue Title</b> Seed library</p>	<p>Submission raised the issue for the need for a seed library.</p>	<p><b>CE Response:</b> The Council is currently harvesting its own wildflower seeds for reuse within the county as referenced on page 81 of the Draft Plan. The Council intends to develop this practice over the life of the Plan. It is not the intention of the Council to develop a specific seed library at the</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>time of writing the Draft Plan, but this may be explored over the life of the Plan.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Pocket Forests</p>	<p>Submissions raised the issue of the development of pocket forests in urban areas</p>	<p><b>CE Response:</b> Pocket forests were planted in several locations in the county in recent years and the Council intends to continue to progress this in the delivery of Action N16.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Alien Invasive Species</p>	<p>Submission raised the issue of monitoring areas posing an alien invasive species threat.</p>	<p><b>CE Response:</b> The issue raised will be dealt with in the delivery of Action N1 – implementing the County Biodiversity and Invasive Species Action Plans.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Wildlife crime</p>	<p>Submission raised the issue of the need for Actions in the Plan to deal with wildlife crimes</p>	<p><b>CE Response:</b> The issue raised in relation to reporting wildlife crime such as illegal hedge cutting is provided for on the Council's website and the National Parks and Wildlife Service websites,  <a href="https://www.dlrco.ie/biodiversity/wildlife-general-information-and-contacts">https://www.dlrco.ie/biodiversity/wildlife-general-information-and-contacts</a>  <a href="https://www.npws.ie/national-parks">https://www.npws.ie/national-parks</a> and  <a href="https://www.wildlifecrime.ie">https://www.wildlifecrime.ie</a></p> <p>It is considered that the Council's website is a widely known platform for people to find appropriate links and information on how to report wildlife crime and therefore an additional</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>Action in the Draft Climate Action Plan is not needed.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Increased Tree Planting</p>	<p>Submissions raised the issue of the multiple benefits of planting trees.</p>	<p><b>CE Response:</b> The issue raised is noted and addressed through the implementation of the County Biodiversity Action Plan 2021-2025, the proposed action N5 of the draft CCAP and the DLR Tree Strategy 'A Climate for Trees 2023-2029'.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Protecting trees and hedgerows</p>	<p>Can a monetary value be attached to existing trees and hedgerows of value/to be retained, that is payable by a landowner if they are removed and not retained?</p>	<p><b>CE Response:</b> The issue raised will be addressed in the implementation of Action N13 (page 86)</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> More wildlife in parks and along roadsides and a return to nature</p>	<p>Submissions wanted to see more wildlife in parks and along roads and motorways and enable communities to return to nature.</p>	<p><b>CE Response:</b> Submissions noted and addressed through the implementation of the County Biodiversity Plan and addressed through the promotion of SuDS in the Draft Plan. Motorways are not under the control of the Council. The Council works with communities included in Action C3 and C17.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Weed killer usage.</p>	<p>Submission suggested the use and sale of glyphosate be banned in the County.</p>	<p><b>CE Response:</b> Submission addressed by existing action N17 for glyphosate use by the Council. The ban of the sale of glyphosate is not within the remit of the Council but education through community</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>engagement actions will seek to inform people about the use of glyphosate.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Climate change education</p>	<p>Submission request that all school children are engaged in these Actions in the Draft Plan.</p>	<p><b>CE Response:</b> Action C5 promotes co-operative community biodiversity projects and C11 addresses the submission through the An Taisce Green Schools Programme.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>
<p><b>Issue Title:</b> Increased Tree Planting</p>	<p>Submissions requested far more tree planting and involvement of community groups to deliver this a with need to see more urgent delivery of tree planting, pond creation and nature-based solutions. Submission also suggested need for database of trees in the County.</p>	<p><b>CE Response:</b> Submission addressed by Action N13 the Council's tree strategy. This will be published in Q1 2024.</p> <p><b>CE Recommendation:</b> Change to be made to Action N13 to remove the words '<del>Publish and</del>'</p>
<p><b>Issue Title</b> Ecological surveys of Council Land</p>	<p>Submission suggested dlr carry out ecological audit and survey of Council lands and launch public awareness campaigns about the possibilities of turning private gardens into refuges for biodiversity.</p>	<p><b>CE Response:</b> Action 1.2 of the Biodiversity Plan states: Map all Locally Important Biodiversity Sites (LIBS) within dlr and identify opportunities to increase the number of sites. All the Locally Important Biodiversity Sites mapped in 2020 are on our dlr Ecological Network Map of the Biodiversity Plan and County Development Plan. This is catered for in the Climate Action Plan in Action N8.</p> <p>The issue raised of private garden ecological refuges is catered for through Action N23 and N24.</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p><b>CE Recommendation:</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Suggestions for enhancing biodiversity</p>	<p>Submission noted general support for action in the draft Plan with some specific suggestions such as expansion of No Mow May and exploring how biodiversity can be enhanced in the built environment.</p>	<p><b>CE Response:</b> Submission noted with suggestions referred to relevant Directorates in the Council</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Opportunities for community engagement and collaboration</p>	<p>General support for actions with suggestions for further opportunities in relation to community engagements and protecting watercourses through support of local community groups.</p>	<p><b>CE Response:</b> Submission noted with suggestions referred to relevant Directorates in the Council</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Information on Biodiverse Locations in the County</p>	<p>Submission requested the Plan point to where information on the existing locally important sites for biodiversity are, and set an action to increase the number of locally important biodiversity areas?</p> <p>Submission suggested that there should be an action to target a greater expanse of land for nature purposes across the county.</p>	<p><b>CE Response:</b> Action 1.2 of the Biodiversity Plan, as supported by Action N1 on the Draft Plan, states: Map all Locally Important Biodiversity Sites (LIBS) within DLR and identify opportunities to increase the number of sites. All the Locally Important Biodiversity Sites mapped in 2020 are on our DLR Ecological Network Map of the Biodiversity Plan and County Development Plan.</p>
<p><b>Issue Title</b> New National Park</p>	<p>Submission suggested that an action be included to investigate if there is potential to develop a new national park in Dun Laoghaire-Rathdown, preferably including both land and sea?</p>	<p>National Parks are designated by the government and NPWS see website here: <a href="https://www.npws.ie/national-parks">https://www.npws.ie/national-parks</a>.</p> <p>These parks fulfil specific criteria outlined by the UN In 1969, the International Union for the Conservation of Nature (IUCN). NPWS have not</p>



Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>identified an area in DLR that satisfies these criteria but may in the future.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Protection of biodiversity on development land</p>	<p>Submission suggested that there be an action to reduce the incentive that currently exists for landowners to clear fell sites prior to seeking development consent to protect sites with mature woodlands and extensive biodiversity and ensure they are maintained as much as possible when land is being developed.</p>	<p><b>CE Response:</b> The submission is noted and the suggestion for the need to protect sites including mature woodlands and biodiversity prior to development is agreed and addressed in the Council's Tree Strategy Action 2024-2030 - A Climate for Trees (Action N13 refers) so no new Action is required.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan</p>
<p><b>Issue Title</b> Urban Food Policy</p>	<p>Submission highlighted activity in developing urban food policies globally and proposed that Airfield would implore the Council to collaborate on this. The submission noted that Airfield has a purpose led and educational remit and would be willing and fitting hosts and collaborators for actions such as N11, N23 and N24.</p>	<p><b>CE Response:</b> The request to collaborate on developing urban food policies is noted and will be considered. It is accepted that Airfield Estate would be a fitting partner to assist the Council in the delivery of Actions N11, N23 and N24 and as such will be added as a 'Partner Identified' to these Actions</p> <p><b>CE Recommendation:</b> <a href="#">Airfield Estate</a> to be added as 'Partner Identified' in Actions N11, N23 and N24</p>
<p><b>Issue Title</b> Recommended additions to text</p>	<p>Submission recommended adding this economic benefit: 'Nature based solutions can stimulate the transition to a circular rather than linear economy mindset within the community. The circular economy framework can also stimulate investment</p>	<p><b>CE Response:</b> Submission noted.</p> <p><b>CE Recommendation:</b> Text '<a href="#">Nature based solutions can stimulate the transition to a circular rather than linear economy mindset within the community. The circular</a></p>

Submission	Submission Summary	CE Response and Recommendation
	<p>in nature-based solutions which can save costs linked to environmental damage.'</p> <p>Submission also noted that on page 86 the actions listed under 'Nature based carbon offsetting' don't directly relate to carbon offsetting and listing them as such is confusing - recommend renaming them to 'nature-based actions' and prioritise actions that <b>reduce</b> rather than <b>offset</b> carbon emissions through nature-based solutions. Include actions that encourage a circular mindset e.g. Roll out leaf mould cages for Tidy Districts Groups and community gardens. Demonstration rainwater planter projects and providing steps for making one. Change green space management policy to discourage residents from filling plastic bags with green waste for collection and disposal to encourage the slow mow approach and light touch maintenance.</p>	<p>economy framework can also stimulate investment in nature-based solutions which can save costs linked to environmental damage.' to be added to the Economic Benefits listed on page 84.</p> <p>On page 86 the sub-theme title to be altered to read 'Increase nature-based carbon offsetting and reduction opportunities'</p> <p>Other suggestions have been referred to the relevant directorates.</p>
<p><b>Issue Title</b> Recommended additions to text</p>	<p>Submission suggested to add 'with an emphasis on Nature Based Solutions /SuDs wherever possible following best practice design and governmental guidance' to action N17</p>	<p><b>CE Response:</b> Submission noted and accepted.</p> <p><b>CE Recommendation:</b> Action N17 wording to be altered to read 'Development of on-street Sustainable Urban Drainage systems (SuDS) within the County with an emphasis on nature-based solutions/SuDS where possible following best practice design and governmental guidance.'</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> Suggestions for improvement</p>	<p>Submission notes that the actions already taken by the Parks Department to protect biodiversity is not well known and should be better publicised.</p> <p>Submissions also suggested that carbon offsetting must not be used in lieu of actually reducing emissions - we must plant trees so keep doing this and inform the public about wilding and tree planting.</p> <p>The section is a little vague and aspirational - more targets please. N25 is welcome but it needs more urgency. There is a role for the Council in supporting the many schools in the county in delivering and understanding nature-based solutions.</p>	<p><b>CE Response:</b> Submission noted with suggestions referred to relevant Directorates in the Council.</p> <p>The Council's Tree Strategy 2024-2029 'A Climate for Trees' and the 'Tree Tag' project sets out tree planting targets for the county, and the carbon mitigation benefits this will bring. The Biodiversity Officer and Council Parks staff frequently visit and support schools.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Suggestions for improvement</p>	<p>Submission suggested the installation of a moss wall to sequester carbon and filter pollutants in an urban centre.</p> <p><b>Page 150</b> N25 and N26 should read N24 and N25.</p>	<p><b>CE Response:</b> Suggestion noted and referred to relevant Directorates in the Council. Typo on Page 150 accepted and change will be made to the Draft Plan to correct this.</p> <p><b>CE Recommendation:</b> Page 150 to be edited to correct Action numbering from <del>N25</del> and <del>N26</del> to N24 and N25.</p>

### 5.5.5 Circular Economy & Resource Management

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> Litter and Awareness</p>	<p>Submissions raised the issue of the need for more campaigning and education on waste segregation and rewards from waste collectors when this is done. Submissions also stated that fast food outlets should be more responsible for customers littering from consuming their products and CCTV be used for tracking littering. Submissions noted there is a crucial lack of bins in public spaces and littering is a massive problem and there is a need to reduce street waste going for disposal rather than recycling. Submissions suggested that pizza-box bins and dog fouling bins be trialled and asked if bins for Paper/Carboard and Food Waste could also be included with the Smart recycling bins for plastics and cans?</p>	<p><b>CE Response:</b> Issues raised will be addressed in delivery of action R2 and R17. In collaboration with the Regional Waste Management Office, the Council's Environmental Awareness team runs local and national waste campaigns targeted at schools, households and businesses. Marketing strategies of private waste collectors is outside the remit of the Council. Enforcement Wardens regularly visit fast food premises to check compliance with Waste Regulations including the Litter Pollution Acts and issue fines to those businesses that are non-compliant. Littering issues will be addressed in the delivery of Action R1. Littering incidents reported to the Council on-line or by the Free Phone number 1800 403 503 are investigated by Litter Wardens. The draft Codes of Practice for the use CCTV for the Purposes of Prevention, Detection and Prosecution of Litter Offences is due to be published in 2024 and once in place the Environmental Enforcement Section will use CCTV at litter black spots throughout the County.</p> <p>There are more than 480 smart street bins in operation, the highest number ever at a given time. To meet climate change objectives, the focus must be to reduce waste, streamline the number of bins and increase the efficiencies of the service. Priority will be given to replacing the existing bin fleet - a significant proportion of which is beyond its typical service life. A limited number of Smart recycling bins are</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>operational throughout the County (including Pizza box bins at various hotspot locations following successful trials under the dlr Beta initiative); dedicated dog poo bins are available in beach/coastal locations and are monitored and maintained by the Council. A proposal to roll out more widespread recycling bins would require further validation using a much more expansive trial to verify waste segregation compliance. Should recycling bins be more widely adopted, it would necessitate a restructure to the current street bin service and require significant funding and resource investment. Action R16 will be expanded to include conducting a trial to collect food waste in Smart Bins in the Decarbonising Zone.</p> <p><b>CE Recommendation</b>            Action R16 to be expanded to read 'Monitor and review use of Smart Bins in the county including conducting a trial to collect compostable waste in the Decarbonising Zone' Tracking Measure to be altered to also include 'Volume of food waste segregated for composting from Smart Bins during the trial' Timeframe for this additional measure to be completed to be 2029. Council Role to be Full Accountability/Influence/Co-ordinate and facilitate.</p>
<p><b>Issue Title</b> Recycling Centres/Opportunities</p>	<p>Submissions raised the issue of extending the opening hours of Eden Park Recycling Centre and accepting more materials for reuse at Ballyogan Recycling Park.</p>	<p><b>CE Response:</b> Eden Park Recycling Centre operates under the terms of a Certificate of Registration issued by the Environmental Protection</p>

Submission	Submission Summary	CE Response and Recommendation
	<p>Submission requested that more public recycling opportunities should be offered (particularly for electronics) in places which are accessible by public transport.</p> <p>Submission asked if an action could be added to ensure planning conditions require all retail developments to provide recycling facilities for glass and plastic bottles?</p> <p>Submission asked for more recycling to be encouraged by the provision of spaces for bring centres and these should be visibly promoted on the Council website.</p>	<p>Agency on 12/10/2005 and Part 8 Planning Approval dated 14/02/2005 which specifies its opening hours. The Council is committed to expanding materials accepted for reuse at Ballyogan in addition to water-based paints, bicycles, lawnmowers and gas cylinders currently accepted. Action R4 will be expanded to incorporate the request for annual public recycling events for electric and electronic waste which will be delivered in conjunction with WEEE Ireland. A map of all recycling facilities in the county is available on the Council Website at <a href="https://www.dlrcoco.ie/node/65696#map">https://www.dlrcoco.ie/node/65696#map</a>.</p> <p><b>CE Recommendation</b></p> <p>Wording of Action R4 to be altered to read 'Support the capture of waste electric and electronic equipment (WEEE) at authorised Council Recycling Centres <b>and free WEEE collection events</b>' and wording of the Tracking Measure to be altered to read 'Tonnes of WEEE waste received at Recycling Centres <b>and public events</b> annually'.</p>
<p><b>Issue Title</b> Circular Economy</p>	<p>Submissions raised the issue of the Council having more connections with UCD and local colleges to run workshops on the Circular Economy and to use their wealth of expertise to strengthen the Council's plans. Submissions noted that the Council recognises the economic, environmental and social benefits of moving to a circular economy. Submissions stated that the circular economy concept is flawed if the cost of recycling is excessive. Submissions</p>	<p><b>CE Response:</b></p> <p>The Council will be collaborating with colleges to increase knowledge of the circular economy's principles and practices as Actions R2 and C6 are implemented and will be engaging with UCD and higher-level institutions' research capabilities to strengthen the development of the Register of Opportunities in the Decarbonising Zone and delivery of actions such as C17, R20, R21. Circular economy principles and practices will</p>

Submission	Submission Summary	CE Response and Recommendation
	<p>requested that the Council set up a Rediscovery Centre equivalent in the county to inspire action and creativity. Submission asked to include the development of a vision for a blue economy and reduction in demand in R10. Submission noted that Dundrum would be a very appropriate location for a service like Rediscovery Ballymun - linked to the new Civic Centre. Submission asked that the important connection between national circular economy activity and emissions reductions should be acknowledged in this chapter and the impact of imported goods should be estimated and acknowledged in the Plan regardless of where they are incurred. The Plan should have an action to support circular economy business models and projects through reduced rates, grant supports, enterprise space and other measures and on Page 95 the listed benefit of 'creating jobs' should be supported by a commitment from the Council to facilitate the uptake of work integration schemes e.g. TuS, CE, and CSP for circular economy enterprises. Submission noted that Circular Economy is about clever design so that products can keep being used as long as possible - however most actions seem to relate to waste management.</p>	<p>be implemented in Actions R2, R5, R7, R8, R9, R10 and R15 both in the Council's own operations and in its role as influencer, facilitator and advocate. The Council is considering a proposal from the Rediscovery Centre to set up a hub in Dún Laoghaire-Rathdown to mobilise blue/circular economy actions through demonstration projects and to provide evidence for further investment in blue/circular economy hubs in the county - R10 will be expanded to include the feasibility of setting up blue/circular economy hubs. Regarding the suggestion of reduced rates, rates bills for each ratepayer are calculated in accordance with a formula set out in rating legislation, based on the valuation of the property determined by Tailte Éireann and the Annual Rate on Valuation determined by the Council at the Annual budget meeting. There is no discretion to deviate from this calculation. The Local Enterprise Office promotes and administrates a variety of supports available to business with up to 50 employees including MODOS the circular economy training programme. The Council also supports social and circular economy enterprises in the county such as the Bike Hub to encourage and demonstrate circular business practices.</p> <p><b>CE Recommendation</b> Action R10 to be revised and expanded to read 'Develop a vision for Dún Laoghaire-Rathdown to become a circular county</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> Plastics and Zero Waste</p>	<p>Submissions raised the issue of a plan to reduce the use of plastic being emitted and asked if the Council could declare its intention to become a zero-waste county and promote the Deposit and Return Scheme. Submission suggested the Council should go for big ideas with lots of publicity e.g. 'No single-use town' but cautioned that one must be sure actions are as green as they seem at first sight.</p>	<p>including the feasibility of setting up blue/circular economy hubs in the county.'</p> <p><b>CE Response:</b> Plans for the reducing the use of plastic and awareness campaigns for segregating waste will be addressed by the Council in its implementation of the Waste Management Plan for a Circular Economy 2024-2030 (Action R2). The Council is committed to supporting and promoting circular economy initiatives with businesses and the community (Action C14) including the Deposit and Return scheme. It is also noted that a nationwide deposit return scheme will be launched in February 2024 catering for the direct recycling of single use plastic bottles and cans. The Council will have a role in both raising awareness of the deposit return scheme along with regulation and enforcement.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Food Waste</p>	<p>Submissions raised the issue of all producers of food waste having access to composting bins and the need to host workshops around food waste prevention. Submission noted the climate action plan has no strategy for composting even though this is one of the best ways "to give back" and suggested community gardens could be a great ally here.</p>	<p><b>CE Response:</b> Compliance with the Waste Management (Food Waste) Regulations 2009 requires all producers to compost their food waste and waste collectors are obliged to offer this service - the Council has an enforcement role for these Regulations. Food waste prevention workshops will be rolled out as part of Action C6. Composting will be encouraged and enabled in the implementation of the Draft Waste Management Plan for a Circular Economy 2024-2030 (R2) and by the action to expand the community garden model (N25).</p>



Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Resource Management</p>	<p>Submission requested that water demand management by households, businesses and schools and the development of water use efficiency be considered as an action in the Plan and that Uisce Éireann would be happy to collaborate in leveraging circularity opportunities. Offer grants for water butts or provide free to as many buildings that you can. All homes should have water butts fitted as standard. Submission noted that any meaningful action in resource management should focus on avoiding single-use items. Submission asked that the emphasis be on reducing the use of materials, reuse and then recycling. Can actions be added to support events and businesses to reduce waste e.g. reusable cup schemes and to show that Council owned facilities display best practice in resource management.</p>	<p>CE Response: The resource management priorities mentioned in the submissions reflect the objectives and targets set out in the Waste Plan for a Circular Economy 2024-2030, the implementation of which the Council is committed to facilitating, advocating for and enabling. (R2). The Council welcomes collaboration with Uisce Éireann to Promote water demand management /conservation by households, businesses and schools and this will be included in the Climate Action Plan.</p> <p><b>CE Recommendation</b> New Action Ref C23 to be added. Action wording to read 'Facilitate Uisce Éireann's delivery of water demand/conservation campaigns for schools, households and businesses.' Tracking Measure 'Number of campaigns carried out.' Timeframe wording '2024 and Annually thereafter'. Adaptation/Mitigation wording 'Mitigation' Council Role wording 'Facilitate'. Lead Department(s) wording 'Infrastructure and Climate Change (inc. Road Maintenance and Traffic)' and Partner(s) Identified wording 'Uisce Éireann'.</p>
<p><b>Issue Title</b> Reducing consumerism</p>	<p>Submissions raised the issue of launching campaigns against consumerism and introducing a degrowth taskforce to identify sectors that are not in line with the Council's</p>	<p><b>CE Response:</b> Many of the actions in the Draft Plan align to Responsible Consumption and Consumption UN Sustainable Development Goal 12. These</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>climate aims and need to shrink/disappear. Submission asked that more emphasis be put on waste prevention and responsible consumption/production (SDG 12) Submission requested that R10 be comprehensive and include how demand might be reduced, then reducing inputs, reuse and recycling.</p>	<p>can be identified in Appendix 1 of the Draft Plan (Pages 138-154). The ideas submitted on Action R10 are noted.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Construction and Demolition Waste</p>	<p>Submissions raised the issue of introducing actions to support a greater re-use/use of existing building stock and to bring vacant properties back into use to reach the 2030 climate targets. It also suggested introducing financial incentives to support reuse of buildings and low carbon development and requested pre-demolition waste audits be conducted to support the mitigation of construction and demolition waste.</p>	<p><b>CE Response:</b> Regulation and enforcement of the regulations associated with construction and demolition waste are included in action R1. The Council mandate the use of 'Best practice guidelines for the preparation of resource &amp; waste management plans for construction &amp; demolition projects' as part of the review of planning applications.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Circular Cities</p>	<p>Submissions raised the issue of strengthening the commitment to the Circular Cities Declaration (R9) by including an action to publish an annual progress report and action plan on the 10 levers of the Declaration and ensure widespread communication of same within the Council.</p>	<p><b>CE Response:</b> The Council will embed the European Circular Cities Declaration commitments into the implementation phase of the Draft Plan. Also given that circularity is a key driver of the draft National Waste Management Plan for a Circular Economy 2024-2030 and is a common denominator across all sixteen focus areas in that draft Plan (with associated targeted policies and priority actions for implementation), the Council will be addressing the issue raised in the delivery of Action R2 of the Draft Climate Action Plan.</p> <p><b>CE Recommendation</b></p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		No change to the Draft Plan.
<p><b>Issue Title</b> Reuse and Repair</p>	<p>Submissions raised the issue of the Plan needing to refer to supporting the implementation of reuse targets ahead of recycling targets and that the Rediscovery Centre and other reuse organisations should be identified as a partner in the implementation of Action R5. This action should also include the introduction of signage/ information to identify local reuse and repair organisations. Reuse and repair activities in the county should be acknowledged. Promote Repair Cafes and incentivise climate friendly businesses/local entrepreneurs with green business models through public meetings/one stop shops in Council Offices. Use Council buildings for repair/swap shops and as tool libraries.</p>	<p><b>CE Response:</b> Community Reuse Network Ireland will be altered to read Community Resources Network Ireland (of which the Rediscovery Centre and other reuse organisations are members) as a partner in the delivery of Action 5. The reuse and repair priorities mentioned in the submissions reflect the reuse and repair objectives and targets set out in the Waste Plan for a Circular Economy 2023-2030, the implementation of which the Council is committed to facilitating, advocating for and enabling. (R2). <b>CE Recommendation</b> Community Reuse Network Ireland to be altered to read <b>Community Resources Network Ireland</b> as a Partner Identified in the delivery of Action 5.</p>
<p><b>Issue Title</b> Green Procurement</p>	<p>Submission raised the issue of Action R11 which should be strengthened to show commitment to a minimum number of procurement projects specifying circular not just solely green criteria which could support growth in reuse and repair.</p>	<p><b>CE Response:</b> The issue raised is noted and staff training will include specifying both circular and green criteria in delivering Action R11. <b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Climate Anxiety</p>	<p>Submission raised the need to introduce a bottom-up approach to climate action at local level to tackle climate anxiety e.g. A Climate Ambassadors scheme or enabling artists and creatives to develop inspiring projects responding to the theme of climate change emergency.</p>	<p><b>CE Response:</b> Action C7 will combine heritage and the creative arts to address climate anxiety. A bottom-up approach to climate action will be intrinsic to the delivery of many of the actions in the Community Engagement Chapter involving e.g. citizen science projects, co-operative local community biodiversity projects, the retrofit of SuDs in existing</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>housing developments, the roll out of the Green Schools and Sustainable Energy Communities programmes, circular economy initiatives and walking programmes.</p> <p><b>CE Recommendation</b> Action C7 to be altered to include <b>Creative Ireland</b> as a 'Partner(s) Identified'</p>
<p><b>Issue Title</b> Misconnections and flushing plastic items down the toilet</p>	<p>Could there be an action to inform people of the issues with flushing plastic items down the toilet and the challenges misconnections place on the storm sewer network?</p>	<p><b>CE Response:</b> The Dublin Urban Rivers LIFE project is currently engaging with a selection of residents in the Carrickmines and Shanganagh catchments regarding domestic misconnections in those river catchments. It is expected an output of that project will be several pieces of information for the public regarding the types and impacts of domestic misconnections. This information will be hosted on the Council's website with potential for social media promotion of that information.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>

### 5.5.6 Community Engagement

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> Awareness Raising</p>	<p>Submission raised the issue of the need for more green themed competitions with money prizes enticing more people to enter. Organise area wide green themed days e.g. a day to plant and incentivise schools to plant wildflowers. Arrange trips to green companies for students. Submission suggested engaging with property owners to ensure adequate drainage, insulation and maintenance of their properties as the Council cannot do it all to mitigate climate impacts. Submission requested more collaboration with local colleges and schools. The Council needs to do more awareness on litter management in addition to Action C2. Submission asked that the wording of C17 be changed to include the impacts of climate change on water quality. Submission recommended having more environmental festivals in the county to attract artists to talk about climate issues and further engage the public. Submission also suggested that Teileafón information booths be used to warn the public about upcoming storm/rain events, to report potholes, clogged drains and flooding and for public engagement surveys and that micro wind/solar towers powering info-screens (like the one on Sandymount strand) be installed in the county.</p>	<p><b>CE Response:</b> The Council intends work in partnership with residents, community groups, businesses, sports clubs and the educational sector in the county. The ideas submitted are noted and will be followed up as Actions C6, C8, C11, 12, C17 and C18 are implemented and in the Opportunities to 'Develop a local community and public engagement plan for the Decarbonising Zone' and 'Establish a transition team for the DZ to co-create an Action Plan' (listed on page 129). Litter awareness campaigns will be addressed in the implementation of Action R17 and the Litter Management Plan. Action C17 will be amended to regard the need to raise awareness of the potential impact of climate change on water quality. Request for more environmental festivals, the use of Teileafón information booths and the installation of micro wind/solar towers powering info-screens is noted.</p> <p><b>CE Recommendation</b> Action C17 to be revised to read 'Provide education and raise awareness of the impacts of climate change on biodiversity and water quality'.</p>
<p><b>Issue Title</b> Communication and collaboration</p>	<p>Submissions raised the need for clearer and simpler messaging on climate change</p>	<p><b>CE Response:</b></p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>and noted that through collaboration with the Council communities can assist in creating an inclusive, informed and resilient county. Engagement with groups (such as the Local Residents Association Carysfort Lake Water Health Initiative) can lead to an increase in knowledge for all sectors and help in identifying innovative solutions to tackle environmental challenges. Submission asked the Council to ensure there is a full and engaging programme for Climate Action Week each year as it was missed in 2023, to improve the advertisements for Climate Action Week to reach a wider audience/increase attendance and to provide more in-person events tackling climate change in areas other than biodiversity. Submission acknowledged this may require increasing staff resources to relevant Council departments. Submission recommended a wider media approach to communicating climate change events and stated there is an over reliance on social media and the PPN e-zine which excludes many citizens and reduces community engagement. Submission stated that new actions were needed in respect of developing a communication strategy for the implementation phase of the Plan. Submission stated that all engagement with community groups across the county particularly residents'</p>	<p>The submissions are noted, and the communication and collaboration sentiments expressed will be integral to the implementation of the Plan. Climate Action Week will be considered over the lifetime of the Plan. Additional resourcing of climate action in the county will see more in-person events over each theme in the Plan.</p> <p>To encourage mainstreaming of climate action across the county and to report on the progress being made in implementing the actions in the Draft Plan a new action will be added to the Community Engagement Chapter to produce a newsletter.</p> <p><b>CE Recommendation:</b>            New Action to be added Ref 'C25'. Action wording 'Produce a newsletter to encourage all within the county to take climate action and to report on the progress being made in implementing the actions over the lifetime of the Plan. Tracking Measure wording Number of Newsletters produced annually. Timeframe wording 2024 Annually thereafter. Adaptation/Mitigation wording Mitigation. Council Role wording Full Accountability. Lead Department(s) wording Infrastructure and Climate change (inc. Road Maintenance and Active Travel) and Corporate Affairs (inc. IT and Human Resources).'</p>

Submission	Submission Summary	CE Response and Recommendation
	<p>associations, schools, biodiversity groups and others is to be welcomed.</p>	
<p><b>Issue Title</b> Community-led Climate Action</p>	<p>Submission raised the issue of support for local community formation and establishing of communities for growing food locally, forest gardens, seed swapping, etc. In respect of C10 the submission expressed an interest in seeing a "heritage site" in Dundrum being used as a hub for local engagement on climate matters and noted that Sustainable Energy Communities (SECs) are not well known among the general population but if there are some fully-functioning ones on the Rathdown side of the County they could they be used as a demonstration model, bringing groups interested in the project together to show what can be done - failing that it was suggested that the proposed development in the old shopping centre in Dundrum would be an area where a SEC could be developed. Submission suggested that the supported integration of climate actions into existing community events such as annual Street Feasts would provide an ideal opportunity to show climate action in situ or act as a catalyst for collaborative community projects for climate action. Submission stated that a new action was needed on supporting groups to make grant applications that are in line with the climate goals.</p>	<p><b>CE Response:</b> The Community Climate Action fund will support the development of community led climate action projects (Action C1). Climate Action engagement within the county will be continuously reviewed over the lifetime of the Draft Plan. The nomination for the 'heritage site' referenced in Action C10 of the Draft Plan is noted. The Register of opportunities recognises the need to support the development of the SECs in the Decarbonising Zone and the learnings gained will be implemented county wide over time. The proposal of the old Dundrum shopping centre as a potential location for a SEC is noted. Supported integration of climate actions into existing community events such as annual Street Feasts is noted.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> Council leading by example</p>	<p>a. Submissions raised the issue of the need for Councillors and Council staff to use active travel and public transport, and be seen to do so, to be able to put it in the Climate Action Plan for others to do.</p> <p>b. Submission suggested that libraries be used as climate hubs to run various events/ workshops, and one as an information centre on energy renovation and funding available. The Council's most innovative projects could be used to raise awareness about Zero Emissions Buildings, Whole Life Carbon and NBSs. Suggest Action C19 include 'training in carbon literacy, circularity and green public procurement to support implementing the decarbonisation of the built environment'.</p>	<p>a. <b>CE Response:</b> The Council provides a fleet of electric vehicles, bikes and staff use public transport in the carrying out of work in the county when possible.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p> <p>b. <b>CE Response:</b> The submission is noted. Libraries will be added in as joint lead in the delivery of Action C6 and Action C19 amended to include training in carbon literacy to support implementing the decarbonisation of the built environment. Action R11 addresses training in green procurement which will include circularity for Council staff which can be expanded to other audiences where relevant.</p> <p><b>CE Recommendation</b> Wording of Action C6 to be altered to add <b>Libraries</b> as joint lead for the implementation of this action.</p> <p>Wording of Action C19 to be altered to read 'Create training programme for local authority staff/public in the use of traditional and sustainable materials and skills and <b>carbon literacy</b>'.</p> <p>c. <b>CE Response:</b> Councillors have received climate change related awareness training regarding the Climate Action Plan. The Department of the Environment, Climate and Communications funds the Local Authority</p>



Submission	Submission Summary	CE Response and Recommendation
	<p>c. Submission stated that there is also a need to run training on climate policies, Whole Life Carbon, low carbon solutions and the circular economy for Councillors.</p>	<p>Climate Action Training Programme to ensure ongoing upskilling for local authority staff and elected members.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
<p><b>Issue Title</b> Supports for taking Climate Action</p>	<p>Submissions raised the need for more home energy kits needed to reduce the waiting list and more details on citizen science and various initiatives mentioned. Submission noted C12 (page 107) highlights the need to support GAA clubs but asked what about support for soccer clubs and other sporting organisations. Submission noted the support for schools implementing the Green Schools programme (C11) but felt the climate action work of schools would be immeasurably increased by the rapid rollout of solar panels to all schools. Submission asks that Action C4 be updated to include Thermal Leak Detectors/Energy Metres in the Home Energy Kits and that a youth friendly version for roll out in schools be developed.</p> <p>Submission noted that very little attention is given to a 'just transition' in the Plan, nor is it evident that marginalised communities have been included e.g. the retrofitting of homes and installation of solar panels is encouraged as a strategic priority (page</p>	<p><b>CE Response:</b> Additional resourcing of climate action in the county will see an increase in the number of home energy kits. Action C6 will be expanded to include Sports Clubs. Action EB3 will be expanded to include support for homeowners, schools, businesses, community and club facilities in their endeavours to reduce their carbon footprint.</p> <p>More Home Energy kits will be provided via the libraries network during the lifetime of the Draft Plan to meet the demand and reduce the current waiting list for borrowing them. The request for Action C4 being expanded to include a 'Library of things' service is noted and the feasibility of this will be explored as a Circular Economy opportunity in the DZ (page 129). The desire for Libraries to become a joint lead in the implementation of Action C6 is accepted.</p> <p><b>CE Recommendation</b> Wording for C6 to be revised to read 'Work in partnership with residents, community groups, sports clubs and schools in climate related programmes'</p> <p>Wording of Action C19 to be altered to include additional text as follows:</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	<p>31), but this is beyond the budget of many in our county.</p> <p>Submission suggested that Action C4 be expanded to include a 'Library of things' service (tracking measure the number of items available and borrowed), that C6 include libraries as climate hubs to deliver collaborative climate awareness programmes/workshops to improve climate literacy and action and as such that Libraries be a joint Lead in this Action.</p>	<p>'Create training programmes for local authority staff/public in the use of traditional and sustainable materials and skills, carbon literacy, protection of heritage assets and any other specific skills training necessary to address the adaptation, mitigation and emergency management issues arising from the impact of climate change'.</p> <p>Wording of EB3 to be altered to read 'Facilitate the development of offshore renewable energy projects whilst advocating and exerting influence to ensure such projects promote climate action co-benefits, support homeowners, schools, businesses, community and club facilities in their endeavours to reduce their carbon footprint and do not contravene relevant environmental protection criteria or cause significant negative environmental effects'. Tracking Measure to be altered to add 'Offshore Renewable Projects undertaken'</p> <p>Wording of Action C6 to be altered to add Libraries as joint lead for the implementation of this Action.</p>
<p><b>Issue Title</b> Expand climate themed events</p>	<p>Submission requested that C9 be updated to also include national events such as Cruinniú and Bealtaine</p>	<p><b>CE Response:</b> The request for Action C9 to be updated to also include national events such as Cruinniú and Bealtaine is accepted.</p> <p><b>CE Recommendation:</b> Wording of Action C9 to be updated to read 'Increase climate themed events for national events such as National Heritage Week, Cruinniú and Bealtaine'.</p>
<p><b>Issue Title</b> Businesses as a community</p>	<p>Submissions raised the issue of bolstering community engagement to include more business-related actions and suggested</p>	<p><b>CE Response:</b> The Council is considering a proposal from the Rediscovery Centre to set up a hub in Dún</p>

Submission	Submission Summary	CE Response and Recommendation
	<p>another measure in R7 should be the percentage emissions reduction achieved by businesses compared to the 51% target and that promotion of businesses measuring and reporting on their emissions should be a key action. Submission commented on Action C14 and suggested that establishing a circular/blue economy hub would be a very deliberate statement of intent that the Council believes in positive climate action and is proactive in engaging and supporting businesses and the community to live more sustainably. The tracking measure for R7 needs to include a measure for participation levels and incentives e.g. rates rebates for businesses that participate. Submission recommended that the Council could help local businesses with getting town centre locations via subsidised space or grants and thus make the economy more climate resilient.</p>	<p>Laoghaire-Rathdown to mobilise blue/circular economy actions through demonstration projects and to provide evidence for further investment in circular economy hubs in the county - C14 will be expanded to include the feasibility of setting up of blue/circular economy hubs in the county.</p> <p>The reality is that despite the significant marketing and promotion of climate action initiatives and programs already undertaken national and international experience shows that uptake is still at a low level - increasing it may require participation to be mandated by central government.</p> <p>The Local Enterprise Office provides a series of supports to businesses to become more sustainable including the Energy Efficiency Grant which supports the investment in technologies and equipment and follows on from a Green for Micro/Business Report, GreenStart Report or a SEAI Energy Audit with 50% of eligible costs payable from a minimum grant of €1,000 to a maximum of €5,000. More details can be found at <a href="https://www.localenterprise.ie/Portal/Energy/WHAT-IS-THE-ENERGY-EFFICIENCY-GRANT-/What-is-the-Energy-Efficiency-Grant-.html">https://www.localenterprise.ie/Portal/Energy/WHAT-IS-THE-ENERGY-EFFICIENCY-GRANT-/What-is-the-Energy-Efficiency-Grant-.html</a></p> <p>Also, the Green for Business FREE programme helps small businesses take the first step towards becoming more sustainable by giving them access to a green consultant. More details at <a href="https://www.localenterprise.ie/green/new-green-images/what-is-green.html">https://www.localenterprise.ie/green/new-green-images/what-is-green.html</a></p> <p><b>CE Recommendation</b></p>

Submission	Submission Summary	CE Response and Recommendation
		<p>Action C14 to be revised and expanded to read 'Promote and support Circular Economy initiatives with businesses and the community including the feasibility of setting up of blue/circular economy hubs in the county.'</p>
<p><b>Issue Title</b> Potential partners</p>	<p>Submissions raised the issue of Airfield Estate as an educational trust that is open to the public daily (more than 250,000 visitors annually) being a perfect home for community engagement and partnering in delivery of the Climate Action Plan. For C3 Airfield currently has two citizen science projects. For C10 Airfield could be the perfect partner for this. For C11 Airfield asks that the Farmer Time programme is considered for timely inclusion alongside this. Airfield is well placed to work on delivering and supporting C6, C9, C15, C17, and C18. For C16 - Airfield runs a free community walk on Mondays in the estate. Submission suggested that an Action, additional to C14, be added committing to supporting the development of a circular/blue economy hub in the county with a focus on community engagement which would also speak to Actions C10 and C17 and stated that The Rediscovery Centre would be a willing partner in delivering such an Action. Submission requested that the HSE be considered a partner for all aspects of the Plan - in addition to Emergency Management.</p>	<p><b>CE Response:</b> The proposal to be a partner for the delivery of Action C10 is noted. Farmer Time programme will be included in Action C11. The Council is considering a proposal from the Rediscovery Centre to set up a hub in Dun Laoghaire to mobilise blue/circular economy actions through demonstration projects and to provide evidence for further investment in circular economy hubs in the county - C14 will be expanded to include the feasibility of setting up of blue/circular economy hubs in the county. The request for the HSE to be considered a partner for all aspects of the Plan is noted.</p> <p><b>CE Recommendation</b> Action C11 to be revised and expanded to read 'Encourage and support schools implementing the An Taisce Green Schools Programme and the Farmer Time Programme '. The Tracking Measure to be revised to read 'Number of schools awarded Green Flag. Number of schools participating in Farmer Time Programme.' Partner Identified to be revised to read An Taisce Airfield Estate.</p> <p>Action C14 to be revised and expanded to read 'Promote and support Circular Economy initiatives with businesses and the community including the feasibility of setting up of blue/circular economy hubs in the county.'</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		The Rediscovery Centre to be added as a Partner Identified to Action C14.

## 5.6 Chapter 6 Decarbonising Zone

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> Location of the Decarbonising Zone (DZ)</p>	<p>Submissions raised the issue of the location of the DZ not being representative of the county as the area is well served by public transport and is also an affluent area of the county. It was suggested to expand the DZ to as many areas as possible with specific recommendations to include areas with more suburban sprawl, the most deprived areas of the county, Dundrum and additional residential areas in Blackrock</p>	<p><b>CE Response:</b> The DZ chosen is large and incorporates all the elements and activities carried out in the county and is thus representative of the county which is the purpose of the DZ (see pages 111 and 112 of the Draft Plan). The climate change wins achieved in the DZ will be replicated within the remainder of the county including transport climate change gains.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Funding of decarbonising measures</p>	<p>Submission queried how the proposed solar PV panels and home energy upgrades included in the DZ will be funded.</p>	<p><b>CE Response:</b> The scope of the Council's responsibility on climate action includes advocating and facilitating climate change improvements across all potential gain areas. This includes promoting climate mitigation options in private residential areas. The purpose of the Decarbonising Zone is to facilitate communities in working with the Council to explore options to reduce the amount of carbon produced by their everyday activities. This includes the use of solar panels by homeowners. The cost of solar panel instalment in private dwellings is currently borne by the homeowner with government grants available through Sustainable Energy Agency Ireland.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> Transport Climate Pathway</p>	<p>Submissions raised the issue of the feasibility of the transport climate pathways in the DZ, specifically:</p> <ol style="list-style-type: none"> <li>a. With regards to the 5% reduction in LGV and HGV km, what is the level of growth against which the reduction in km is measured</li> <li>b. The lack of Avoid measures, e.g. freight consolidation, parcel motels included in the pathways</li> <li>c. The feasibility of switching cars and HGVS to EVs and delivering a fully low emission public urban bus fleet by 2030.</li> </ol>	<p><b>CE Response:</b></p> <p>The main objective of the DZ is to find innovative but achievable ways to reduce greenhouse gas emissions. Different approaches and projects including freight logistics planning improvements, 'avoid' measures and the feasibility of vehicle/fleet electrification will be tested and perfected in the DZ over the lifetime of the Plan.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Removal of car parking spaces</p>	<p>Submission suggested the removal of car parking spaces to encourage public transport use.</p>	<p><b>CE Response:</b></p> <p>The issue raised is addressed in T8 for the county and will also apply in the DZ.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Omission of bus services</p>	<p>Submission queried the omission of the 46a, 63 and 75 bus routes in the Transport links section of the DZ.</p>	<p><b>CE Response:</b></p> <p>The bus routes were omitted in error from the Draft Plan.</p> <p><b>CE Recommendation</b> Page 113 to be updated to include the '46a, 63 and 75' bus routes as well as 'any bus routes that have begun operation in the DZ as part of the BusConnects Network Redesign.'</p>
<p><b>Issue Title</b> Solar panels</p>	<p>Submission requested the implementation of solar panels on all buildings.</p>	<p><b>CE Response:</b></p> <p>In the Register of Opportunities on page 128 solar PV is listed for both residential and commercial buildings and will be explored to the fullest in the implementation of the Draft Plan.</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> DZ administrative burden</p>	<p>Submission raised the issue that the DZ places further burdens on people.</p>	<p><b>CE Response:</b> Submission is noted.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Support for the DZ</p>	<p>Submissions expressed support for the DZ.</p>	<p><b>CE Response:</b> Submissions are noted.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Additional Communication/Reporting on DZ</p>	<p>Submissions requested additional communication on the DZ and to report on progress and learnings from the DZ.</p>	<p><b>CE Response:</b> The Council plans to develop a local community and public engagement plan for the DZ. In addition, to increase inclusivity and public participation it is envisaged to explore opportunities to develop a project webpage which will report on progress and learnings in the DZ as stated on page 129 of the Draft Plan.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Potential Partner</p>	<p>Submission suggested Airfield estate as a suitable partner for the DZ due to its considerable experience in stakeholder engagement.</p>	<p><b>CE Response:</b> Airfield's interest is noted, and the climate change wins achieved in the DZ will be replicated within the remainder of the county.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> New Gas Infrastructure</p>	<p>Submission raised the issue of new gas infrastructure and the need for a transition</p>	<p><b>CE Response:</b></p>



Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
	to renewable energy and a reduction in energy demand.	<p>The submission is noted, and it is considered the Draft Plan aligns with the submission view.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Ambition within the DZ</p>	<p>Submission queried the level of ambition within the DZ and the need to address emissions associated with the built environment as well as operational, embodied and transport emissions. The submission also requested the consideration of ambitious projects within the DZ that address dereliction and vacancy and take into account circularity and the reduction of whole life carbon.</p>	<p><b>CE Response:</b> The issues raised are noted and the purpose of creating a Decarbonising Zone (DZ) is to allow for opportunities to explore options to decarbonise activities within this zone. The establishment of the transition team for the DZ comprising of representatives from the local community, business, transport, and energy sectors and others to co-create an Action Plan is likely to result in many proposals and opportunities to pilot projects or approaches for decarbonising the county.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>

## 5.7 Chapter 7 Implementation and Reporting

Submission	Submission Summary	CE Response and Recommendation
<p><b>Issue Title</b> General Comment</p>	<p>Submission commented that the sense of urgency could be demonstrated in turnaround times for planning and permitting and queried what role citizens can play in terms of reporting as the Council cannot do it all. Submission suggested a citizen reporting and data collection process would assist in Collective Action.</p>	<p><b>CE Response:</b> Noted comment regarding 'urgency'. The role of the community (citizens role and collective action) is addressed through the addition of a new theme Community Engagement in this iteration of the dlr Climate Action Plan.</p> <p>The public can currently report any issue of concern to the Council at <a href="mailto:info@dlrcoco.ie">info@dlrcoco.ie</a></p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Plan Reporting and Key Performance Indicators</p>	<p>Submissions sought clarity on the use of Key Performance Indicators, cost benefit analysis and methods of communication around reporting against progress.</p>	<p><b>CE Response:</b></p> <p>The Key Performance Indicators (listed as Tracking Measures) developed and used in the Draft Plan are outcome focused and were guided by the 'Local Government Climate Action Key Performance Indicators (KPIs) – in an Irish Context' report available from the Local Government Management Agency website (<a href="http://www.lgma.ie">www.lgma.ie</a>). The Council sought to measure in a meaningful way the effectiveness of all the proposed actions listed in the Draft Plan over the timeframe of their delivery to provide an indicator of progress achieved in meeting the targets set. New KPIs may be added to throughout the lifetime of the Plan as further evidence is gathered to inform the development of robust and reliable sectoral indicators.</p> <p>Progress in implementing the climate actions will be included in the Quarterly Management</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p>Report from all departments which will be available on the Council's website. The Climate Action Team will report quarterly to the Environment and Climate Action Strategic Policy Committee and biannually to all the elected members at full Council meetings which are live streamed and are also available for viewing subsequently. Updates will also be promoted on social media platforms, the Council website and in the dlrTimes quarterly newsletter.</p> <p>To encourage mainstreaming of climate action across the county and to report on the progress being made in implementing the actions in the Draft Plan a new action will be added to the Community Engagement Chapter to produce a newsletter.</p> <p><b>CE Recommendation:</b>                      New Action to be added Ref 'C25'. Action wording 'Produce a newsletter to encourage all within the county to take climate action and to report on the progress being made in implementing the actions over the lifetime of the Plan. Tracking Measure wording Number of Newsletters produced annually. Timeframe wording 2024 Annually thereafter. Adaptation/Mitigation wording Mitigation. Council Role wording Full Accountability. Lead Department(s) wording Infrastructure and Climate change (inc. Road Maintenance and Active Travel) and Corporate Affairs (inc. IT and Human Resources).'</p>
<p><b>Issue Title</b></p>	<p>Submission noted the integration of Sustainable Development Goals and how it</p>	<p><b>CE Response:</b></p>

Submission	Submission Summary	CE Response and Recommendation
<p>Sustainable Development Goals and Environmental Governance</p>	<p>interacts with the Draft Plan and sought clarification as to the meaning of SDG13 Climate Action and whether it is a goal in and of itself. Submissions also welcomed integration of environmental governance across the Draft Plan.</p>	<p>Sustainable Development Goal (SDG)13 is one of 17 Sustainable Development Goals established by the United Nations General Assembly in 2015. The official mission statement of this goal is to ‘Take urgent action to combat climate change’. SDG 13 seeks to achieve a climate-neutral world by mid-century and to limit global warming to well below 2°C — with an aim of 1.5°C — compared with pre-industrial times. It aims to strengthen countries’ climate resilience and adaptive capacity, with a special focus on supporting least-developed countries. It is considered that the need for and undertaking of climate action is a goal that is achieved when climate action is implemented, however, the ongoing need for climate action at a local level is a goal that will continue to be strived for in the context of the implementation of the dlr Draft Plan Climate Action Plan. The feedback regarding environmental governance is noted.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Measuring the effect of the Draft Plan.</p>	<p>Submission proposed examining the effect of the dlr Climate Action Plan from a sociological perspective to assess its social impact on residents, businesses, workers and visitors for the duration of the Plan - possibly in conjunction with UCD School of Sociology. Submissions also suggested engaging with national and international scholars to garner reflective insights and critical perspectives on the way progress is being measured.</p>	<p><b>CE Response:</b> Suggestion regarding assessing the social impact of the Draft Plan is noted. The Council is committed to working collaboratively and in partnership with a range of key stakeholders including third level institutions (nationally and internationally) and the private sector to support the delivery and the assessment of the effectiveness of the Draft Climate Action Plan (as stated on page 133).</p>

Chief Executive's Report on Submissions Received

Submission	Submission Summary	CE Response and Recommendation
		<p><b>CE Recommendation</b> No change to the Draft Plan.</p>
<p><b>Issue Title</b> Collaboration with key stakeholders</p>	<p>The submission raised the importance of collaboration with neighbouring counties as consistency of approach and standards is critical and encouraged the Council to use the 'Build Upon Energy Renovation Framework' to capture data on the impact of its energy renovation programme. The IGBC stated that it would be happy to share all the tools and training materials developed as part of creating the Framework with the Council.</p>	<p><b>CE Response:</b> Submission is noted and details of the technical manual for the 'Build Upon Energy Renovation Framework' will be shared with the relevant Council Departments for information/follow up.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>

## 6 Submissions from Prescribed Environmental Authorities

The following tables work through the submissions made by prescribed environmental authorities and the effect of any changes to the Natura Impact Report (NIR) (also known as Appropriate Assessment (AA)) or the Strategic Environmental Assessment Environmental Report (SEA ER) which will be made. The tables also cater for non-material amendments to the Draft Plan as, again, shown in green text.

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
<b>Environmental Protection Agency (EPA)</b>	The Strategic Environmental Assessment (SEA) should also assist in identifying ways to maximise the potential co-benefits of climate-related measures for air quality, human health, biodiversity, water quality and other interrelated areas (i.e. win-win solutions)	<p><b>CE Response:</b></p> <p>Noted and agreed. It is noted that the Draft SEA Environmental Report (ER) has defined Environmental Governance Principles and action amendment suggestions to ensure climate action co-benefit opportunities are maximised. Various defined mitigation measures serve to promote win-win solutions.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>	None	None
	We recommend that the findings of the SEA ER and Natura Impact Report (NIR) are fully reflected in the Draft Plan, to ensure that the relevant recommendations are fully considered and integrated as appropriate	<p><b>CE Response:</b></p> <p>Noted and agreed. Environmental mitigation measures in the form of Environmental Governance Principles and climate action amendment suggestions have been fully integrated into the Draft Plan itself.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>	None	None

Chief Executive's Report on Submissions Received

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
	<p>Environmental Authorities</p> <p>Under the SEA Regulations, you should consult with:</p> <ul style="list-style-type: none"> <li>• Environmental Protection Agency;</li> <li>• Minister for Housing, Local Government and Heritage;</li> <li>• Minister for Environment, Climate and Communications;</li> <li>• Minister for Agriculture, Food and the Marine.</li> </ul>	<p><b>CE Response:</b></p> <p>Noted. All listed Environmental Authorities have been consulted with as part of the SEA process.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>	None	<p>Changes to SEA ER</p> <p>None</p>
	<p><b>Non-Technical Summary (NTS)</b></p> <p>You should ensure that the Non-Technical Summary includes the relevant information as required under Schedule 2 of S.I No. 434 Of 2004, as amended.</p>	<p><b>CE Response:</b></p> <p>It is assumed that SI No. 434 (Taxes Consolidation Act 1997) is a typo and SI No. 435 (European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations <b>2004</b>) is what was intended to be addressed with this statement.</p> <p>The requirements of Schedule 2 of SI No 435 have been noted and amendments to the NTS will be made as appropriate.</p> <p><b>CE Recommendation:</b></p>	None	<p>Update the Non-Technical Summary to reflect the relevant information as required under Schedule 2 of SI No 435 of 2004 as amended.</p>

Chief Executive's Report on Submissions Received

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
		No change to the Draft Plan.		
	<p><b>Relationship with other plans and programmes</b></p> <p>We acknowledge that the Plan has been prepared taking account of the key National plans including the National Climate Action Plan 2023. We also acknowledge that the Plan sets out the key plans, programmes and policies considered in preparing the SEA.</p> <p>The Plan should include a commitment to remain aligned with high level plans and programmes, Guidelines, and legislation over its lifetime. The Climate Action Plan 2024 is currently being prepared and work will be commencing on the review of the National Planning Framework and Regional Spatial and Economic Strategies also. Any relevant updates of these plans/strategies should be integrated as appropriate into the Plan as relevant and appropriate.</p> <p>The Plan should include a commitment to consider any relevant updated actions, measures or recommendations that may arise in updates to the National Climate Action Plan (or the National Planning Framework) over the lifetime of the Plan.</p>	<p><b>CE Response:</b></p> <p>Noted and agreed. It is noted that this is in reference to the LACAP and not the SEA ER or AA NIR documentation.</p> <p><b>CE Recommendation:</b></p> <p>Paragraph 1, Page 15 to be changed to add the text below.</p> <p>'The Draft Climate Action Plan will consider and appropriately integrate relevant updates to the national Climate Action Plan, National Planning Framework and Regional Spatial and Economic Strategies over the lifetime of the Draft Climate Action Plan and have consideration of relevant EPA State of the Environment Reports.'</p>	None	None
	<p><b>Strategic Environmental Objectives</b></p> <p>We recommend that in considering strategic environmental objectives, they should where possible reflect the plan being prepared,</p>	<p><b>CE Response:</b></p> <p>Noted. The Strategic Environmental Objectives defined have been very specifically defined to reflect the</p>	None	None



Chief Executive's Report on Submissions Received

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
	rather than use more generic environmental objectives. This will help both in considering more specific monitoring and mitigation measures, when required.	<p>themes, goals, objectives and climate action contained in the Draft Plan and in light of the potential environmental effects associated with Plan implementation.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>		
	<p><b>Alternatives</b></p> <p>We note the alternatives considered in the SEA and acknowledge the preferred option selected</p>	<p><b>CE Response:</b> Noted.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>	None	None
	<p><b>Mitigation Measures</b></p> <p>Where the potential for likely significant effects has been identified, you should provide appropriate mitigation measures to avoid or minimise these. You should also ensure that the Plan includes clear commitments to implement the relevant mitigation measures.</p>	<p><b>CE Response:</b></p> <p>The SEA produced recommended a suite of mitigation measures in response to climate actions considered to have potentially significant environmental effects.</p> <p>Environmental Governance Principles have been defined for the purpose of underpinning and framing the defined climate actions. All activities and development supported by the defined climate actions shall be undertaken or influenced by the local authority, as appropriate, in</p>	None	None

Chief Executive's Report on Submissions Received

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
		<p>accordance with these Environmental Governance Principles.</p> <p>Mitigation has also been achieved by the integration of environmental considerations into the defined LACAP climate actions.</p> <p>These mitigation measures have been wholly integrated into the LACAP.</p> <p>Section 8 of the SEA ER provides full details of these environmental mitigation measures.</p> <p><b>CE Recommendation:</b></p> <p>Page 22, sub section Strategic Environmental Assessment, to be changed to add an additional sentence at the end of the first paragraph to read – 'The mitigation measures provided in Section 8 of the Strategic Environmental Assessment Environmental Report will be referenced when implementing the Draft Climate Action Plan 2024-2029 or any variation over the lifetime of the Draft Plan'.</p>		

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
	<p><b>Monitoring, Implementation &amp; Reporting</b></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 deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities.</p> <p>If the monitoring identifies adverse impacts during the implementation of the Plan, then you should ensure that suitable and effective remedial action is taken.</p> <p>Guidance on SEA-related monitoring is available on the EPA website at <a href="https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf">https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf</a></p>	<p><b>CE Response:</b></p> <p>The SEA Monitoring Programme established for the Draft LACAP is contained in the SEA ER. This monitoring programme has been developed in accordance with EPA guidelines entitled '<i>Guidance on SEA Statements and Monitoring</i>' (2020).</p> <p>The monitoring programme is multi-faceted, broad in scope and has been designed to allow for a flexible and adaptive approach to SEA monitoring during Draft Plan implementation.</p> <p>The monitoring programme has been designed to inherently measure cumulative effects that may arise due to the implementation of the Draft Plan.</p> <p>This plan considers both positive and negative effects, as per the following statement from the SEA text:</p> <p><i>'Where monitoring identifies that the implementation of the LACAP is having a significant negative environmental effect, an in-depth review of the LACAP should take place and the LACAP should be updated in a manner that</i></p>	<p>None</p>	<p>Update the SEA monitoring programme to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects arising due to plan implementation.</p> <p>Provide additional detail on monitoring programme data sources</p>

Chief Executive's Report on Submissions Received

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
		<p><i>satisfactorily mitigates these environmental effects (i.e., through the adoption of additional environmental mitigation measures.). Similarly, where monitoring indicates that potential positive environmental effects associated with LACAP implementation are not being adequately realized, the LACAP should be reviewed and updated in a manner that supports the realisation of all potential positive environmental effects, having regard to the overall vision and high-level objectives of the plan.'</i></p> <p>It is noted however that additional opportunities exist in relation to monitoring the positive environmental effects of defined climate action – in connection with SEOs PHH1, L1, AQN2, TR1. The SEA monitoring programme will be updated to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects arising due to plan implementation.</p> <p>The monitoring programme includes details on the indicators, targets and data sources to be used to monitor and measure progress. Some additional detail on data sources has</p>		

Chief Executive's Report on Submissions Received

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
		<p>however been provided to better guide the SEA monitoring to be carried out across plan implementation.</p> <p>A commitment to remedial action in the event SEA monitoring shows the implementation of the Plan is having adverse environmental effects has been made in the SEA.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>		
	<p><b>EPA State of the Environment Report</b></p> <p>Our State of Environment Report, Ireland's Environment - An Integrated Assessment 2020 (SOER2020) identifies thirteen 'Key Messages for Ireland'. Delivering Ireland's long term sustainable development and environmental objectives will involve many different stakeholders to address these key actions. The report recognises the need for full implementation of existing environmental legislation and review of governance/co-ordination on environmental protection across public bodies.</p> <p>The EPA are currently preparing the next iteration of the SOER report, which will be published in 2024. We recommend that a commitment is made in the Plan, to take</p>	<p><b>CE Response:</b></p> <p>Noted.</p> <p><b>CE Recommendation:</b></p> <p>Paragraph 1, Page 15 to be changed to add the text below.</p> <p>'The Draft Climate Action Plan will consider and appropriately integrate relevant updates to the national Climate Action Plan, National Planning Framework and Regional Spatial and Economic Strategies over the lifetime of the Draft Climate Action Plan and have consideration of</p>	None	None

Chief Executive's Report on Submissions Received

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
	<p>account of any relevant recommendations in the SOER 2024 report, once published, in implementing the Plan over its lifetime.</p>	<p>relevant EPA State of the Environment Reports.'</p>		
	<p><b>SEA Statement – “Information on the Decision”</b></p> <p>Once the Plan is adopted, you should prepare an SEA Statement that summarises:</p> <ul style="list-style-type: none"> <li>• How environmental considerations have been integrated into the Plan;</li> <li>• How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;</li> <li>• The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,</li> <li>• The measures decided upon to monitor the significant environmental effects of implementation of the Plan.</li> </ul> <p>You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.</p>	<p><b>CE Response:</b></p> <p>Noted. An SEA statement will be produced and circulated to any environmental authority consulted during the SEA process.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>	<p>None</p>	<p>None</p>

Chief Executive's Report on Submissions Received

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
	<p><b>Future Amendments to the Plan</b></p> <p>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</p>	<p><b>CE Response:</b></p> <p>Noted.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>	None	None

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
<b>Sea Fisheries coordination DAFM</b>	<p>Ireland's seafood industry (fishing and aquaculture) is one of the key stakeholders operating in the marine area and plays a vital role in the sustainability of our coastal communities. Over 15,000 people are employed around our coast both directly and indirectly. Many of these communities have very limited alternative employment and economic activity options. It is therefore essential that the socio-economic reliance on the seafood sector is fully recognised and is factored into any Climate Change Action plan. Fishing and food security is as key a part of Government Policy. Food Vision 2030 recognises and values the role of primary food producers.</p>	<p><b>CE Response:</b></p> <p>Noted.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>	None	None.
	<p>The Seafood industry is experiencing a period of difficult change, arising from the ongoing consequences of the EU UK Trade and Co-operation agreement which are</p>	<p><b>CE Response:</b></p> <p>Noted.</p> <p><b>CE Recommendation:</b></p>	None	None.

Chief Executive's Report on Submissions Received

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
	<p>specific and impactful on Ireland's seafood sector. There is now ever-increasing demand on the marine space from Offshore Renewable Energy (ORE), Marine Spatial Planning, Marine Protected Areas (MPAs), and other environmental measures.</p>	<p>No change to the Draft Plan.</p>		
	<p>Our coastal communities and maritime sectors will continue to play a significant role in contributing to our climate goals and will continue to be consulted and supported in the transition to carbon neutrality. The seafood industry, through both the Sectoral Adaptation Plan (Agriculture, Forest and Seafood Climate Change Sectoral Adaptation Plan ) and the annual Climate Action Plan (CAP23 ) continue to support initiatives to improve understanding of our marine area and ensure sustainable resource use, including through bio and circular economy initiatives. These plans require consideration in the SEA process.</p>	<p><b>CE Response:</b> The National Climate Action Plan (2023) and Sectoral Adaptation Plans have been considered in the SEA Process. The relationship of the Plan with other relevant Plans and Programmes has been defined in Appendix 1 of the SEA. Inter-plan cumulative effects have been evaluated in Section 7 of the Draft SEA ER.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>	<p>None</p>	<p>None.</p>
	<p>Also for consideration in the SEA process is the European Commission's Communication on the energy transition of the fisheries and aquaculture sector as part of its Fisheries Policy Package. This proposes the establishment of an Energy Transition Partnership (ETP) to develop a roadmap for the energy transition of the sector towards climate neutrality by 2050. The roadmap will set out investment needs, sector initiatives and inform policy decisions to</p>	<p><b>CE Response:</b> This commentary is noted. Local authorities in Ireland do not have a direct remit over the fisheries and aquaculture sector. The actions defined in the Draft Plan are however mutually symbiotic and harmonious with the vision and measures defined in European Commission's Communication on the energy</p>	<p>Reference should be made to the European Commission's Communication on the energy transition of the fisheries and aquaculture sector in Section 3.4 - <i>In-</i></p>	<p>Reference should be made to the European Commission's Communication on the energy transition of the fisheries and aquaculture sector in Section 7.3 - <i>Potential</i></p>



Chief Executive's Report on Submissions Received

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
	<p>help achieve this transition. The ETP is a multi-stakeholder platform intended to promote co-operation, knowledge sharing and dialogue between private and public stakeholders in order to accelerate the energy transition in the fisheries and aquaculture sector. This Partnership will help to shape the development of future transitional actions for Ireland's seafood sector. Local authorities should include relevant steps to support a Just Transition for the sea fisheries and aquaculture sectors in their Climate Action Plans.</p>	<p>transition of the fisheries and aquaculture sector. Insofar as the local authority's remit extends, the Draft Plan supports the protection and enhancement of the marine environment. The climate action defined in the Draft Plan has the potential to generate multiple climate action benefits, and co-benefits for the water and biodiversity environments and by extension the marine environment (i.e. biodiversity conservation and enhancement, coastal protection, water quality protection and improvements etc.).</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>	<p><i>combination effects with Other Plans and Programmes, and Appendix 2 - Relationship with other plans and programmes, as appropriate.</i></p>	<p><i>Cumulative Effect of the Draft LACAP in combination with other Plans and Projects, and Appendix 1 - Relationship of the Plan with other relevant Plans and Programmes, as appropriate.</i></p>
<p><b>Department Housing, Local Government and Heritage</b> <b>(Archaeology)</b></p>	<p><b>Archaeology</b> The Department of Housing, Local Government and Heritage welcomes the publication of local authority draft Climate Change Adaptation Strategy. The Department draws your attention to the <b>Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019)</b> prepared as part of the National Adaptation Framework. The Climate Change Sectoral Adaptation Plan (CCSAP) identifies the priority impacts for</p>	<p><b>CE Response:</b> Noted.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>	<p>Reference should be made to the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) in Section 3.4 - <i>In-combination effects with Other Plans and Programmes,</i></p>	<p>Reference should be made to the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) in Section 7.3 - <i>Potential Cumulative Effect of the Draft LACAP in combination with other Plans and</i></p>

Chief Executive's Report on Submissions Received

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
	<p>the built and archaeological heritage based on current climate change projections.</p>		<p>and Appendix 2 - <i>Relationship with other plans and programmes, as appropriate.</i></p>	<p><i>Projects, and Appendix 1 - Relationship of the Plan with other relevant Plans and Programmes, as appropriate.</i></p>
	<p>The Heritage Division of the Department (National Monuments Service and National Built Heritage Service) is engaged with the local authorities through the departmental Climate Change Advisory Group and established Working Groups to ensure a consistent approach to protection and adaptation of heritage assets across the country and an alignment of policies, plans and actions across national, regional and local climate action. The Department anticipates ongoing engagement with the local authorities throughout the implementation of current and future sectoral adaptation plans.</p>	<p><b>CE Response:</b> Noted.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>	<p>None.</p>	<p>None.</p>
	<p>In the preparation and implementation of the local authority adaptation strategy, there are a number of issues regarding protection of built and archaeological heritage that the Department recommends be taken into account to identify the heritage assets at risk in its area, assess their vulnerability to climate change, increase their resilience and develop disaster risk reduction policies for direct and</p>	<p><b>CE Response:</b> Noted.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>	<p>None.</p>	<p>None.</p>

Chief Executive's Report on Submissions Received

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
	indirect risks. For example, it is recommended that the strategies should consider:			
	Identifying the built and archaeological heritage assets in the local authority area including, but not restricted to, structures and sites subject to statutory protection under the National Monuments Acts 1930 to 2014, or the Planning and Development Acts.	<p><b>CE Response:</b> The SEA scoping report and SEA Environmental Report identify the built and archaeological heritage assets in the LA including structures and sites subject to statutory protection under the National Monuments Acts 1930 to 2014, and the Planning and Development Act (as amended). Exhaustive detail on built and archaeological heritage is held on record by the local authority and provided in the Country Development Plan already.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>	None.	None.
	Including objectives to carry out climate change risk assessments, including condition assessments, for the historic structures and sites in its area	<p><b>CE Response:</b> Noted. The Council will have regard to the impact of climate change on any historic structures and sites and take any actions necessary to protect them.</p>	None.	None.
	Including objectives to develop disaster-risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area	<p><b>CE Response:</b> The Council will consider disaster risk reduction in respect of built and archaeological heritage in the</p>	None.	None.

Chief Executive's Report on Submissions Received

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
		county as part of its emergency response and planning for climate impacts		
	Including objectives to develop resilience and adaptation strategies for the built and archaeological heritage in its area.	<p><b>CE Response:</b> Noted. The Draft Plan defines actions that will improve the climate resilience of architectural and archaeological heritage within the local authorities remit.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>	None.	None.
	Developing the skills capacity within the local authority to address adaptation/mitigation/emergency management issues affecting heritage assets in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works.	<p><b>CE Response:</b> Climate change mandatory training for staff and for elected members has been provided in recent times. However, the suggestion of more comprehensive training in the consideration of climate change in the implementation relevant staff's duties is worth exploring.</p> <p><b>CE Recommendation</b> Action C19 to be altered include additional text as follows:  'Create training programmes for local authority staff/public in the use of traditional and sustainable materials and skills, carbon literacy, protection of heritage assets and any other specific</p>	None.	None.

Chief Executive's Report on Submissions Received

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
		<p>skills training necessary to address the adaptation, mitigation and emergency management issues arising from the impact of climate change'.</p>		
	<p>The Department will shortly be publishing a new guidance document Improving Energy Efficiency in Traditional Buildings. This guidance will assist retrofitting installers and specifiers in how best to choose and apply energy efficiency measures to the historic building stock. The guidance is also intended to assist building owners and occupants in making decisions about upgrading their buildings, many of which are of architectural heritage significance. It is recommended that all proposed retrofitting projects undertaken or supported by the local authority to buildings of traditional construction should follow the principles and practice set out in that guidance</p>	<p><b>CE Response:</b> The SEA Environmental Report has defined mitigation measures within the Draft Plan to ensure that any retrofitting of buildings including protected structures is carried out in a manner that doesn't impinge on built heritage or protected structures. The mitigation measures in the SEA ER will be referenced throughout the life of the Climate Action Plan in its implementation and in any variation.</p> <p><b>CE Recommendation:</b> Page 22, sub section Strategic Environmental Assessment, to be changed to add an additional sentence at the end of the first paragraph to read – 'The mitigation measures provided in Section 8 of the Strategic Environmental Assessment Environmental Report will be referenced when implementing the Draft Climate Action Plan</p>	None.	None

Chief Executive's Report on Submissions Received

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
		2024-2029 or any variation over the lifetime of the Draft Plan'.		
	Finally, it is recommended that, where such officers are employed, the Architectural Conservation Officer, Heritage Officer and Archaeologist should be included on the local authority's Adaptation Steering Group.	<p><b>CE Response:</b> Noted.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>	None.	None.
	You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: referrals@npws.gov.ie	<p><b>CE Response:</b> Noted.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>	None.	None.
<p><b>Department of Housing, Local Government and Heritage</b>   <b>(National Parks and Wildlife service)</b></p>	Having considered the Draft Dún Laoghaire-Rathdown County Council Climate Action Plan 2024-2029 and the Strategic Environmental Assessment (SEA) Environmental Report and Natura Impact Report (NIR) prepared in relation to this draft plan the Department makes the following observation.	N/A	None.	None.
	The Department previously in August of this year made a submission in relation to the scoping of the SEA for the Dún Laoghaire-Rathdown County Council Climate Action Plan. In this submission corrections were suggested with regards to factual errors concerning the occurrence of protected plant species in the Dún Laoghaire-Rathdown County Council administrative area contained in Table 3.1 'Designated Ecological sites and Protected Species' in Section 3.3 Biodiversity, Flora and Fauna of	<p><b>CE Response:</b> Noted. The correction of these errors will not alter the envelope of the Draft Plan-level environmental assessment undertaken. The environmental mitigation defined will serve to ensure environmental protection at source.</p> <p><b>CE Recommendation:</b></p>	The NIR will be updated to correct these factual errors	The SEA ER will be updated to correct these factual errors.

Chief Executive's Report on Submissions Received

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
	<p>the scoping report. It is noted that these factual errors have not been corrected in the corresponding Table 4.1 'Designated Ecological Sites and Protected Species' in Section 4.3 Biodiversity, Flora &amp; Fauna of the SEA Report prepared in relation to the Draft Climate Action Plan. It is therefore recommended that Table 4.1 in the SEA Environmental Report should be modified to incorporate the corrections with regards to the occurrence of protected plant species in the Dún Laoghaire-Rathdown area suggested in the Department's submission on the SEA scoping for the Climate Action Plan.</p>	<p>No change to the Draft Plan.</p>		
	<p>Amongst the corrections in the Department's submission referred to above with regards to the occurrence of protected plant species in the Dun Laoghaire-Rathdown area the presence of the protected species <i>Puccinellia fasciculata</i> Borrer's Saltmarsh-grass in Booterstown Marsh was noted. This is relevant to Action N10 of the Climate Action Plan included under the heading Nature Based Solutions which is to "Prepare a Habitat and Species Management Plan for Booterstown Marsh proposed Natural Heritage Areas (sic) (pNHA)", which is subject to Note A "Having appropriate regard to the need to support the achievement of conservation objectives and protect the qualifying interests of this site". As a site of a plant species protected under the Flora (Protection) Order 2022</p>	<p><b>CE Response:</b> Noted.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>	<p>None.</p>	<p>None.</p>

Chief Executive's Report on Submissions Received

Consultee	Submission Text	Detailed Response	Changes to AA	Changes to SEA ER
	<p>(Statutory Instrument S.I No. 235 of 2022) any interference with Booterstown Marsh is illegal except under licence from the National Parks and Wildlife Service of this Department. It should also be noted that while Booterstown Marsh is listed to be proposed for designation as a Natural Heritage Area (NHA), it is part of an already designated European site, the South Dublin Bay and Tolka Estuary Special Protection Area (SPA).</p>			
	<p>The Department therefore recommends that the wording of Action N10 of Climate Action Plan should be altered to 'Prepare a Habitat and Species Management Plan for Booterstown Marsh, a Protected Plant Species Site and part of the South Dublin Bay and Tolka Estuary SPA subject to the agreement of the National Parks and Wildlife Service'.</p>	<p><b>CE Response:</b> The submission is noted and agreed.</p> <p><b>CE Recommendation:</b> Action N10 to be altered to include additional text as follows: 'Prepare a Habitat and Species Management Plan for Booterstown Marsh proposed National Heritage Area (pNHA), a Protected Plant Species Site and part of the South Dublin Bay and Tolka Estuary Special Protection Area subject to the agreement of the National Parks and Wildlife Service.'</p>	None.	None.



## 7 Summary of Chief Executive’s recommendations for Proposed Modifications

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

Draft CAP Section and Page	Proposed Modifications	SEA & AA Assessments
Section 6 Decarbonising Zone Transport Links on Page 113	Page 113 to be updated to include the 46a, 63 and 75 bus routes as well as any bus routes that have begun operation in the DZ as part of the BusConnects Network Redesign	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Section 5 Community Engagement Page 108 and Appendix 1 page 154	Action C17 to be revised to read ‘Provide education and raise awareness of the impacts of climate change on biodiversity and water quality’.	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Section 5 Community Engagement Page 108	New Action Ref C24 to be added to the Community Engagement Chapter. Action wording ‘Explore and respond to ways in which the climate transition will affect different groups in the county including facilitating skills training and energy poverty reduction measures so that no one is left behind, Tracking Measure wording Number of people availing of interventions offered, Timeframe wording 2029, Adaptation/Mitigation wording Mitigation, Council Role wording Full Accountability/ Influence /Co-ordinate and facilitate /Advocate. Lead Department(s) wording Infrastructure and Climate change (inc. Road Maintenance and Traffic). Partners Identified wording Codema, Third Level Institutions, the HSE and the Community and Voluntary Sector.	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.

Chief Executive's Report on Submissions Received

Draft CAP Section and Page	Proposed Modifications	SEA & AA Assessments
Energy and Buildings Page 47	Page 47 - the following definition for energy efficiency to be added 'Energy efficiency is the use of less energy to perform the same task or produce the same result. Energy-efficient homes and buildings use less energy to heat, cool, and run appliances and electronics, and energy-efficient manufacturing facilities use less energy to produce goods.'	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Evidence-Based Climate-Action Page 31	Text on Page 31 to be altered to read 'Active travel (walking and cycling) and public transport solutions will be prioritised.'	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Evidence-Based Climate-Action Page 27	Layout changes to text and Table 3.2 as suggested will be made where appropriate.	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Community Engagement Page 108 and Appendix 1 Page 154	Action C20 wording to be amended as follows: 'Promote energy awareness within the county and the Council including workshop type events.'	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Transport Pages 65,65,66	Note A (text 'Having due regard to environmental sensitivities such as receiving water environment, biodiversity, European sites local air quality and cultural heritage.') to be included in Actions T13 and T21 on pages 64 and 65. Note A on page 66 to include the text Actions T13 and T21.	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Transport Page 66 and Appendix 1 Page 144	The wording of T20 to be altered to read 'Identify opportunities to upgrade the existing road and footway network to mitigate damage due to weather events and to provide new footpaths'. The wording of tracking measure to be altered to: 'Length of existing road network upgraded. Length of footway repaired.' The	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.

Chief Executive's Report on Submissions Received

Draft CAP Section and Page	Proposed Modifications	SEA & AA Assessments
	wording of timeframe to be altered to read '2024 and annually thereafter'. 'Both' to be replaced with 'Adaptation'.	
Energy and Buildings Page 57	Text on Page 57 to be amended so as to be consistent with Figure 3.4, Page 30 and to read 'In our county, the transportation sector is the largest contributor to GHG emissions, with an estimated 41% of total emissions.	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Community Engagement Page 106 and Appendix 1 Page 153	Wording of Action C8 to be altered to read 'Promote and encourage community involvement in the retrofit of SuDS or development of natural flood management measures 'and blue/green infrastructure' in existing housing /developments/local areas.	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Flood Resilience Page 71	Page 71 in the section 'Implementation of Urban Greening/Nature Based Surface Water Management in the County' last sentence in paragraph two to include the additional text in green. 'For example, any future developments must incorporate measures, appropriate to the scale of the proposed development, such as green roofs, water retention, areas, permeable paving and rainwater harvesting swales that minimise water flows to the public drainage system and maximise infiltration potential having due regard to groundwater vulnerability.'	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Draft CAP Section and Page	Proposed Modifications	SEA & AA Assessments
Community Engagement Page 106	The 'Planning and Economic Development (including Dún Laoghaire Harbour) Directorate and Private Landowners as Partner(s) Identified to be added into Action C8.	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Flood Resilience Page 146	Private Landowners to be included as Partners Identified relating to Urban Greening in Action F11	Modifications to the Draft Plan will not give rise to likely significant effects on the

Chief Executive's Report on Submissions Received

Draft CAP Section and Page	Proposed Modifications	SEA & AA Assessments
		environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Flood Resilience Page 70	On page 70 <b>Coastal flooding</b> to be added to the definition of flooding.	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Nature Based Solutions Page 86 and Appendix 1 Page 149	Wording of Action N11 to be revised to read 'Develop guidance on biodiversity inclusive design for housing <b>development including social housing</b> with green roofs, wetland & pond SuDS, green carparking, nest boxes, local soil and seed for landscaping, and wildlife friendly shrubs and native trees.'	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Nature Based Solutions Page 87	Change to be made to Action N25 to include <b>Community Gardens Ireland</b> as an Identified Partner.	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Page 86 Nature Based Solutions and Appendix 1 Page 149	Change to be made to Action N13 to remove the words <b>'Publish and'</b>	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Nature Based Solutions Pages 86,87	<b>Airfield Estate</b> to be added as 'Partner Identified' in Actions N11, N23 and N24	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Nature Based Solutions Pages 84,86 and in Appendix 1 on Page 149	Text <b>'Nature based solutions can stimulate the transition to a circular rather than linear economy mindset within the community. The circular economy framework can also stimulate investment in nature-based solutions which can save costs linked to</b>	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.

Chief Executive's Report on Submissions Received

Draft CAP Section and Page	Proposed Modifications	SEA & AA Assessments
	<p><b>environmental damage.'</b> to be added to the Economic Benefits listed on page 84                      On page 86 the sub-theme title to be altered to read 'Increase nature-based carbon offsetting <b>and reduction opportunities'</b></p>	
<p>Nature Based Solution                      Page 87 and in Appendix 1 on                      Page 149</p>	<p>Action N17 wording to be altered to read 'Development of on-street Sustainable Urban Drainage systems (SuDS) within the County <b>with an emphasis on nature-based solutions/SuDS where possible following best practice design and governmental guidance.'</b></p>	<p>Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.</p>
<p>Appendix 1                      Page 150</p>	<p>Page 150 to be edited to correct Action numbering from <b>N25</b> and <b>N26</b> to <b>N24</b> and <b>N25</b>.</p>	<p>Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.</p>
<p>Circular Economy and Resource Management                      Page 97 and                      Appendix 1                      Page 152</p>	<p>Action R16 to be expanded to read 'Monitor and review use of Smart Bins in the county <b>including conducting a trial to collect compostable waste in the Decarbonising Zone'</b> Tracking Measure to be altered to also include <b>'Volume of food waste segregated for composting from Smart Bins during the trial'</b> Timeframe for this additional measure to be completed to be <b>2029</b>. Council Role to be <b>Full Accountability/Influence/Coordinate and facilitate</b>.</p>	<p>Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.</p>
<p>Circular Economy and Resource Management                      Page 96 and Appendix 1 Page                      151</p>	<p>Wording of Action R4 to be altered to read 'Support the capture of waste electric and electronic equipment (WEEE) at authorised Council Recycling Centres <b>and free WEEE collection events'</b> and wording of the Tracking Measure to be altered to read 'Tonnes of WEEE waste received at Recycling Centres <b>and public events</b> annually'</p>	<p>Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.</p>

Chief Executive's Report on Submissions Received

Draft CAP Section and Page	Proposed Modifications	SEA & AA Assessments
Circular Economy and Resource Management Page 97 and Appendix 1 Page 151	Action R10 to be revised and expanded to read 'Develop a vision for Dún Laoghaire-Rathdown to become a circular county including the feasibility of setting up blue/circular economy hubs in the county.'	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Community Engagement Page 108	New Action Ref C23 to be added. Action wording to read 'Facilitate Uisce Éireann's delivery of water demand/conservation campaigns for schools, households and businesses.' Tracking Measure 'Number of campaigns carried out.' Timeframe wording '2024 and Annually thereafter'. Adaptation/Mitigation wording 'Mitigation' Council Role wording 'Facilitate'. Lead Department(s) wording 'Infrastructure and Climate Change (inc. Road Maintenance and Traffic) and Partner(s) Identified wording 'Uisce Éireann'.	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Circular Economy and Resource Management Page 96	Community Reuse Network Ireland to be altered to read Community Resources Network Ireland as a Partner Identified in the delivery of Action 5.	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Community Engagement Page 108 and Appendix 1 on Page 154	Action C17 to be revised to read 'Provide education and raise awareness of the impacts of climate change on biodiversity and water quality'.	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Community Engagement Page 108	New Action to be added Ref 'C25'. Action wording 'Produce a newsletter to encourage all within the county to take climate action and to report on the progress being made in implementing the actions over the lifetime of the Plan. Tracking Measure wording Number of Newsletters produced annually. Timeframe wording 2024 Annually thereafter. Adaptation/Mitigation wording Mitigation. Council Role wording Full Accountability. Lead Department(s) wording Infrastructure and Climate change (inc. Road	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.

Draft CAP Section and Page	Proposed Modifications	SEA & AA Assessments
	Maintenance and Active Travel) and Corporate Affairs (inc. IT and Human Resources).'	
<p>Appendix 1 Page 153-154 Community Engagement Page 106, 108</p> <p>Energy and Buildings Page 52 and Appendix 1 Page 139</p>	<p>Wording for C6 to be revised to read 'Work in partnership with residents, community groups, sports clubs and schools in climate related programmes'</p> <p>Wording of Action C19 to be altered to include additional text as follows:</p> <p>'Create training programmes for local authority staff/public in the use of traditional and sustainable materials and skills, carbon literacy, protection of heritage assets and any other specific skills training necessary to address the adaptation, mitigation and emergency management issues arising from the impact of climate change'.</p> <p>Wording of EB3 to be altered to read 'Facilitate the development of offshore renewable energy projects whilst advocating and exerting influence to ensure such projects promote climate action co-benefits, support homeowners, schools, businesses, community and club facilities in their endeavours to reduce their carbon footprint and do not contravene relevant environmental protection criteria or cause significant negative environmental effects'. Tracking Measure to be altered to add 'Offshore Renewable Projects undertaken'</p> <p>Wording of Action C6 to be altered to add Libraries as joint lead for the implementation of this Action.</p>	<p>Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.</p>

Chief Executive's Report on Submissions Received

Draft CAP Section and Page	Proposed Modifications	SEA & AA Assessments
	Wording of Action C9 to be updated to read 'Increase climate themed events for national events such as National Heritage Week, <b>Cruinniú and Bealtaine</b> '.	
Community Engagement Page 107 and Appendix 1 Page 153	Action C14 to be revised and expanded to read 'Promote and support Circular Economy initiatives with businesses and the community <b>including the feasibility of setting up of blue/circular economy hubs in the county.</b> '	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Community Engagement page 106 and Appendix 1 page 153	Action C7 to be altered to include <b>Creative Ireland</b> as a 'Partner(s) Identified'	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Community Engagement page 107 and Appendix 1 page 153	<p>Action C11 to be revised and expanded to read 'Encourage and support schools implementing the An Taisce Green Schools Programme <b>and the Farmer Time Programme</b>'. The Tracking Measure to be revised to read '<b>Number of schools awarded Green Flag. Number of schools participating in Farmer Time Programme.</b>'</p> <p>Partner Identified to be revised to read <b>An Taisce Airfield Estate.</b></p> <p>Action C14 to be revised and expanded to read 'Promote and support Circular Economy initiatives with businesses and the community <b>including the feasibility of setting up of blue/circular economy hubs in the county.</b>'</p> <p><b>The Rediscovery Centre</b> to be added as a Partner Identified to Action C14.</p>	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Energy and Buildings pages 52 to 54 and Appendix 1 pages 139 to 141	Action EB8 to be altered to include <b>Infrastructure and Climate Change (including Road Maintenance and Traffic)</b> as a 'Lead Directorate'.	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required



Chief Executive's Report on Submissions Received

Draft CAP Section and Page	Proposed Modifications	SEA & AA Assessments
	<p>Action EB9 to be altered to include the additional text into the 'Tracking Measure' as follows: 'The number of energy and decarbonisation upgrades carried out through the Energy Efficiency Retrofitting Programme (EERP). Note B</p> <p>Action EB9 to be altered to delete(red) and include(green) text as follows in 'Lead Directorate' <del>Architects/ Energy Team</del> Corporate Affairs (including IT and Human Resources) and Infrastructure and Climate Change (including Road Maintenance and Traffic)</p> <p>Action EB9 to be altered to include Architects/Energy Team and Codema as 'Partner(s) Identified'. Action EB17 to include Codema as a 'Partner(s) Identified'.</p> <p>Action EB18 to be altered to include Codema as a 'Partner(s) Identified'.</p> <p>Action EB21 to be altered to include the additional text into the 'Tracking Measure' energy use and decarbonisation</p> <p>Action EB21 to be altered to include Corporate Affairs (including IT and Human Resources) as a 'Lead Directorate'.</p> <p>Action EB25 to be altered to include Corporate Affairs (including IT and Human Resources) as a 'Lead Directorate'.</p>	<p>to be undertaken for the Modifications to the Draft Plan.</p>
Page 15	<p>Paragraph 1 on page 15 to be replaced by the text below as follows:</p> <p>Climate Action Plan 2024</p> <p>Climate Action Plan 2024 builds upon previous Plans, by refining and updating the measures and actions required to deliver the carbon budgets and sectoral</p>	<p>Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.</p>

Draft CAP Section and Page	Proposed Modifications	SEA & AA Assessments
	<p>emissions ceilings. The Plan provides a roadmap for taking decisive action to halve Ireland's emissions by 2030 and reach net zero by no later than 2050, as committed to in the Climate Action and Low Carbon Development (Amendment) Act 2021.</p> <p>CAP24 recognises that local government has a key role to play in implementing measures to meet Ireland's national climate targets and in supporting and mobilising climate action, at the regional and local levels. This role will increase with the development of Local Authority Climate Action Plans (LACAP). These Plans will provide a strong emphasis on a place-based approach to climate action, promoting a better public understanding of climate related risks at the local level and addressing context specific conditions.</p> <p>CAP24 includes the following local government specific climate actions:</p> <p>LG/24/1 - Adopt the Local Authority Climate Action Plans                      LG/24/2 - Develop Decarbonising Zones                      LG/24/3 - Develop a monitoring and reporting system for the Local Authority Climate Action Plans                      LG/24/4 - Review and update the Climate Action Charter                      LG/24/5 - Roll out Phase 2 of the Smart and Sustainable Mobility Accelerator Programme                      LG/24/6 - Support Cork and Dublin in the EU Climate - neutral and Smart Cities Mission</p> <p>The Council will continue to have regard to the national Climate Action Plan (and revisions thereof) in implementing and monitoring the local authority Climate Action Plan.</p>	

Chief Executive's Report on Submissions Received

Draft CAP Section and Page	Proposed Modifications	SEA & AA Assessments
Page 22	Page 22, sub section Strategic Environmental Assessment, to be changed to add an additional sentence at the end of the first paragraph to read – 'The mitigation measures provided in Section 8 of the Strategic Environmental Assessment Environmental Report will be referenced when implementing the Draft Climate Action Plan 2024-2029 or any variation over the lifetime of the Draft Plan'.	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Page 15	Paragraph 1, Page 15 to be changed to add the text below.  'The Draft Climate Action Plan will consider and appropriately integrate relevant updates to the national Climate Action Plan, National Planning Framework and Regional Spatial and Economic Strategies over the lifetime of the Draft Climate Action Plan and have consideration of relevant EPA State of the Environment Reports.'	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Chapter 5 Page 86 and Appendix 1 Page 149	Action N10 to be altered to include additional text as follows: 'Prepare a Habitat and Species Management Plan for Booterstown Marsh proposed National Heritage Area (pNHA), a Protected Plant Species Site and part of the South Dublin Bay and Tolka Estuary Special Protection Area subject to the agreement of the National Parks and Wildlife Service.'	Modifications to the Draft Plan will not give rise to likely significant effects on the environment. Full SEA and AA are not required to be undertaken for the Modifications to the Draft Plan.
Minor text changes	The Chief Executive recommends a number of minor text changes to the Draft Plan. These include corrections of typographical errors, clarifications, references and infographic material.	N/A

## 8 Conclusions

This Chief Executive's Report on the submissions received to the Dún Laoghaire-Rathdown County Council Draft Climate Action Plan 2024-2029, during Public Consultation, is hereby submitted to the Elected Members of the Local Authority, for their consideration.

At the 12 February, 2024, County Council meeting the Elected Members consider this Chief Executive's Report, pursuant to the Climate Action and Low Carbon Development Act 2015 as amended by Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021 and decide by resolution, whether to:

- approve, or
- approve, subject to such non-material modifications as they consider appropriate, the local authority Draft Climate Action Plan 2024-2029.

Taking into account the Dún Laoghaire-Rathdown County Council Draft Climate Action Plan 2024-2029, this Chief Executive's Report on the Draft Plan Public Consultation, Strategic Environmental Assessment and Appropriate Assessment Screening of Chief Executive's Report, it is recommended that the Draft Climate Action Plan 2024-2029 be approved by the Elected Members.

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

### **Resolution:**

*In accordance with the Climate Action and Low Carbon Development Act 2015 and as amended by Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021 and having considered the Draft Climate Action Plan 2024-2029 and the Chief Executive's Report on Submissions Received, **this Council hereby resolves to APPROVE and ADOPT the Dún Laoghaire-Rathdown County Council Draft Climate Action Plan 2024-2029.***

*A screening determination for the need for Strategic Environmental Assessment (SEA) has been made by Dún Laoghaire-Rathdown County Council for the Modifications to the Draft Plan, under Directive 2001/42/EC. The screening assessment was carried out using the criteria for determining the likely significance of effects as set out in Schedule 1 of S.I. 435/2004, as amended. Following assessment of the criteria and having regard to the nature of the Modifications to the Draft Plan and the potential for likely significant environmental effects associated with the Modifications, Dún Laoghaire-Rathdown County Council has concluded that the Modifications to the Draft Plan, will not give rise to likely significant effects on the environment.*

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


## Appendix A List of submitters to the Draft Climate Action Plan public consultation process

**Note:** The privacy statement for the dlr Climate Action Plan public consultation process stated the names of submitters would not be made public either in the Chief Executive's report or on the Council's website. The table below provides the list of unique identifier reference codes for those that made an online submission. Submissions made by email are noted as email. All submissions listed below have been examined, considered and discussed in the body of the Chief Executive's report. There were no submissions by post.

Reference number
ANON-4N9U-CCAW-E
ANON-4N9U-CCAN-5
ANON-4N9U-CCQZ-1
ANON-4N9U-CCQK-J
ANON-4N9U-CCQC-A
ANON-4N9U-CC8N-V
ANON-4N9U-CC8S-1
ANON-4N9U-CC8B-G
ANON-4N9U-CC8X-6
ANON-4N9U-CCSA-A
ANON-4N9U-CCST-W
ANON-4N9U-CCSK-M
ANON-4N9U-CCS2-U
ANON-4N9U-CCSW-Z
ANON-4N9U-CCW3-Z
ANON-4N9U-CCWG-M
ANON-4N9U-CCWP-W
ANON-4N9U-CCSF-F
ANON-4N9U-CCW9-6
ANON-4N9U-CCWB-F
ANON-4N9U-CCS3-V
ANON-4N9U-CCWK-R
ANON-4N9U-CCW1-X
ANON-4N9U-CCXM-U
ANON-4N9U-CC8D-J
ANON-4N9U-CCWS-Z
ANON-4N9U-CCX8-6
ANON-4N9U-CCX6-4
ANON-4N9U-CCXY-7

<b>Reference number</b>
ANON-4N9U-CCX9-7
ANON-4N9U-CCXV-4
ANON-4N9U-CCXW-5
ANON-4N9U-CCW6-3
ANON-4N9U-CCX1-Y
ANON-4N9U-CCXQ-Y
ANON-4N9U-CCXF-M
ANON-4N9U-CCWH-N
ANON-4N9U-CCWF-K
ANON-4N9U-CCX4-2
ANON-4N9U-CCX5-3
ANON-4N9U-CCXU-3
ANON-4N9U-CCXT-2
ANON-4N9U-CCXK-S
ANON-4N9U-CCXN-V
ANON-4N9U-CCWU-2
ANON-4N9U-CCX2-Z
ANON-4N9U-CCXD-J
ANON-4N9U-CCXZ-8
Email 1
Email 2
Email 3
Email 4
Email 5
Email 6
Email7
Email 8
Email 9
Email10
Email 11
Email 12
Email 13

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


www.dlrco.ie

### NOTICE OF THE PREPARATION OF THE DÚN LAOGHAIRE-RATHDOWN COUNTY COUNCIL DRAFT CLIMATE ACTION PLAN 2024-2029

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

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

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

**Public Consultation**

The Dún Laoghaire-Rathdown County Council Draft Climate Action Plan 2024-2029, the Strategic Environmental Assessment Environmental Report and Appropriate Assessment Natura Impact Report, will be on display from Wednesday 20th September to Friday 03rd November 2023, at the following locations:

- online at [www.dlrco.ie](http://www.dlrco.ie)
- at Dún Laoghaire-Rathdown County Council, County Hall, Marine Road, Dún Laoghaire, A96 K6C9, Monday to Friday (excluding Bank Holidays) between the hours of 9.00 am to 5:00 pm (Monday to Thursday) and 09.00 am to 16:30 on Fridays.
- Dún Laoghaire-Rathdown County Council, Dundrum Office Park, Main Street, Dundrum D14 YY00, Monday to Friday (excluding Bank Holidays) between the hours (9.30am -12.30pm & 1.30pm – 4.30pm)
- All branches of Dún Laoghaire-Rathdown Libraries during Library opening hours.

**Public Information Sessions**

A series of public information sessions in respect of the Draft Climate Action Plan are planned as set out below:

- The Parish Pastoral Centre, Holy Cross Church, Main St, Dundrum, Co. Dublin, D14 K820 on Tuesday, 03 October from 3.00 pm to 7.00pm.
- The Assembly Hall, Dún Laoghaire-Rathdown County Council County Hall, Marine Road, Dún Laoghaire, Co. Dublin, A96 K6C9 on Tuesday, 10 October from 3.00 pm to 7.00pm.
- The Round Room, The Mansion House, Dawson St, Dublin 2 on Tuesday, October 17th from 3.00 pm to 7.00pm

Any further public consultation events will be advertised during the consultation period on [www.dlrco.ie](http://www.dlrco.ie).

**Submissions / Observations**

Written submissions or observations regarding the Draft Climate Action Plan, Strategic Environmental Assessment Environmental Report and Appropriate Assessment Report, are invited from members of the public and other interested parties. You can make a submission or observation between Wednesday 20th September 2023 up to 11:59pm on 03 November 2023 inclusive, through the following options only:

A written submission can be made:

Electronically through the Council's Public Consultation Portal available at <https://dlrco.citizenspace.com/infrastructure-climate-change/climate-action-plan-2024-to-2029> from 20th September 2023 up to on 11:59pm on 03 November 2023;

or

In hard copy  
By post to the following address:  
**Draft Climate Action Plan 2024-2029 Consultation Dún Laoghaire-Rathdown County Council, County Hall, Marine Road, Dún Laoghaire, Co. Dublin A96 K6C9.**

or

by hand at one of the locations where the draft Plan is on display.

or

By email to: [climate@dlrco.ie](mailto:climate@dlrco.ie)

**The closing date for receipt of submissions or observations is Friday 03 November 2023.**

Please make your submission or observations by one medium only i.e., online, via email or in hard copy.

Submissions or observations should include your name and address and, where relevant, details of any organisation, community group or company etc. which you represent. Children, or groups or associations representing the interests of children, are particularly encouraged to make submissions or observations regarding the foregoing.

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

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

**Data Protection**

All submissions received that provide consent, will be published on the website of the Council accompanied by their name or the organisation's name they submitted on behalf of. Their name will be listed in the Chief Executive's report which will be published on the website of the Council.

Where consent has not been provided, the name of individuals will not be published on the website of the Council, however the content of their submission will be published on the website of the Council. Their name will be listed in the Chief Executive's report, which will be published on the website of the Council.

The full privacy statement associated with the processing of your data for the submission on the Draft Climate Action Plan 2024 -2029 is available on Council's website at [www.dlrco.ie](http://www.dlrco.ie)

**Paul Kennedy**  
Director of Service  
Infrastructure and Climate Change (including Road Maintenance and Traffic)      Dated: Wednesday 20th September 2023

Dún Laoghaire-Rathdown County Council,  
County Hall, Dún Laoghaire, Co. Dublin, Ireland

## FÓGRA MAIDIR LE HULLMHÚ DHRÉACHT-PHLEAN GNÍOMHAITHE AR SON NA HAERÁIDE CHOMHAIRLE CONTAE DHÚN LAOGHAIRE-RÁTH AN DÚIN, 2024-2029

Tugtar fógra leis seo go bhfuil Dréachtphlean Gníomhaithe ar son na hAeráide 2024-2029 ullmhaithe ag Comhairle Contae Dhún Laoghaire-Ráth an Dúin de bhun Alt 16 den Acht um Ghníomhú ar son na hAeráide agus um Fhorbairt Isealcharbóin (Leasú), 2021. Tá ag gabháil leis an Dréachtphlean Tuarascáil Chomhshaoil um Measúnú Straitéiseach Comhshaoil (MSC), arna hullmhú de réir Rialacháin na gComhphobal Eorpach (Measúnú Comhshaoil ar Phleananna agus ar Chláir Áirithe), 2004 (I.R. 435 de 2004 arna leasú le I.R. 200 de 2011), agus Measúnacht Chúil (AA) i ndáil le Tuarascáil Tionchair Natura, de bhun Airteagal 6 den Treoir um Ghnáthóga 92/43/CEE.

Leagtar amach sa Dréachtphlean an chaoi ar féidir leis an údarás áitiúil raon bearta maolaithe, bearta oiriúnaithe agus bearta aeráide eile a chur chun cinn, chun cabhrú le hoibleagáidí náisiúnta aeráide agus Ollchuspóir Náisiúnta Aeráide an Rialtais a chomhlíonadh, a fhéachann le haistriú go geilleagar atá athléimeach ó thaobh na haeráide de, saibhir ó thaobh na bithéagsúlachta de, inbhuanaithe ó thaobh an chomhshaoil de agus neodrach ó thaobh carbóin de a lorg agus a bhaint amach.

### Comhairliúcháin Poiblí

Beidh Dréachtphlean Gníomhaithe ar son na hAeráide Chomhairle Contae Dhún Laoghaire-Ráth an Dúin, an Tuarascáil Chomhshaoil MSC agus an Mheasúnacht Chúil i ndáil le Tuarascáil Tionchair Natura ar taispeántóir Dé Céadaoin, an 20 Meán Fómhair go dtí Dé hAoine, an 3 Samhain 2023 ag na láithreacha seo a leanas:

- ar líne ag [www.dlrco.ie](http://www.dlrco.ie)
- ag Comhairle Contae Dhún Laoghaire-Ráth an Dúin, Áras an Chontae, Bóthar na Mara, Dún Laoghaire, A96 K6C9, ó Luan go hAoine (seachas Laethanta Saoire Bainc), idir 09:00 agus 17:00 (Luan go Déardaoin) agus idir 09:00 agus 16:30 (ar an Aoine).
- Comhairle Contae Dhún Laoghaire-Ráth an Dúin, Páirc Oifige Dhún Droma, an Phríomhshráid, Dún Droma, D14 YY00, ó luan go hAoine (seachas Laethanta Saoire Bainc) idir 09:30 agus 12:30 agus idir 13:30 agus 16:30.
- Gach brainte de Leabharlanna Dhún Laoghaire-Ráth an Dúin le linn uaireanta oscailte an bhrainte.

### Seisiúin Eolais don Phobal

Tá sraith seisiúin eolais don phobal ar an Dréachtphlean Gníomhaithe ar son na hAeráide beartaithe mar atá leagtha amach thíos:

- Ionad Tréadach an Pharóiste, Séipéal na Croise Naofa, an Phríomhshráid, Dún Droma, Co. Bhaile Átha Cliath, D14 K820 – Dé Máirt, an 3 Deireadh Fómhair ó 15:00 go 19:00.
- An Halla Tionóil, Áras an Chontae, Comhairle Contae Dhún Laoghaire-Ráth an Dúin, Bóthar na Mara, Dún Laoghaire, Co. Bhaile Átha Cliath, A96 K6C9 – Dé Máirt, an 10 Deireadh Fómhair ó 15:00 go 19:00.
- An Seomra Cruinn, Teach an Ard-Mhéara, Sráid Dhásain, Baile Átha Cliath 2 – Dé Máirt, an 17 Deireadh Fómhair ó 15:00 go 19:00.

Fógrófar aon imeachtaí comhairliúcháin poiblí eile le linn na tréimhse comhairliúcháin ar [www.dlrco.ie](http://www.dlrco.ie).

### Aighneachtaí/Tuairimí

Fáilteofar roimh aighneachtaí nó tuairimí i scríbhinn ón bpobal agus ó pháirtithe leasmhara eile maidir leis an Dréachtphlean Gníomhaithe ar son na hAeráide, an Tuarascáil Chomhshaoil MSC agus an Mheasúnacht Chúil. Is féidir aighneacht a dhéanamh nó tuairim a chur isteach idir Dé Céadaoin, an 20 Meán Fómhair 2023 agus 23:59 ar an 3 Samhain 2023 ar na bealaí seo a leanas amháin: Is féidir aighneacht i scríbhinn a dhéanamh:

Go leictreonach trí Thairseach Comhairliúcháin Poiblí na Comhairle, atá ar fáil ag <https://dlrco.citizenspace.com/infrastructure-climate-change/climate-action-plan-2024-to-2029>, ón 20 Meán Fómhair 2023 go dtí 23:59 ar an 3 Samhain 2023;

nó

Mar chóip chrua

Tríd an bpost chuig an seoladh seo a leanas:

Comhairliúcháin maidir leis an Dréachtphlean Gníomhaithe ar son na hAeráide, 2024-2029, Comhairle Contae Dhún Laoghaire-Ráth an Dúin, Áras an Chontae, Bóthar na Mara, Dún Laoghaire, Co. Bhaile Átha Cliath, A96 K6C9.

nó

de láimh ag ceann de na láithreacha a bhfuil an Dréachtphlean ar taispeántóir.

nó

Tríd an ríomhphost chuig: [climate@dlrco.ie](mailto:climate@dlrco.ie)

### Dé hAoine, an 3 Samhain 2023 an spríodhata le haighneachtaí agus tuairimí a fháil.

Iarrtar ort gan d'aighneacht a dhéanamh ná do thuairimí a chur isteach ach ar aon bhealach amháin, i.e. ar líne, tríd an ríomhphost nó mar chóip chrua.

Ba cheart d'ainm agus do sheoladh a bheith san áireamh in aighneachtaí nó tuairimí agus, nuair is cuí, sonraí aon eagraíochta, grúpa pobail nó cuideachta srl. a bhfuil tú ag déanamh ionadaíochta dóibh. Spreagtar leanaí, nó grúpaí nó cumainn a dhéanamh ionadaíocht ar leasanna leanaí go háirithe, aighneachtaí a dhéanamh nó tuairimí a chur isteach maidir leis an méid sin thuas.

Na haighneachtaí agus na tuairimí i scríbhinn maidir leis an Dréachtphlean a gheofar laistigh den tréimhse luaithe, cuirfear san áireamh iad sula ndéanfar an Plean deiridh.

Tabhair faoi deara **nach ndéanfar plé** le haighneachtaí ná le tuairimí **DÉANACHA**. Moltar go láidir duit d'aighneacht a dhéanamh nó do thuairim a chur isteach chomh luath agus is féidir.

### Cosaint Sonraí

Gach aighneacht a gheofar ina mbeidh toiliú tugtha, foilseofar i ar láithreán gréasáin na Comhairle, chomh maith le hainm an duine nó ainm na heagraíochta a ndéanadh an aighneacht thar a ceann. Déanfar ainm na ndaoine agus na n-eagraíochtaí sin a lua i dTuarascáil an Príomhfhéidhmeannaigh, a foilseofar ar láithreán gréasáin na Comhairle.

I gcás nach mbeidh toiliú tugtha, ní foilseofar ainm na ndaoine aonair ar láithreán gréasáin na Comhairle, ach foilseofar ábhar a n-aighneachta ar láithreán gréasáin na Comhairle mar sin féin. Déanfar ainm na ndaoine agus na n-eagraíochtaí sin a lua i dTuarascáil an Príomhfhéidhmeannaigh, a foilseofar ar láithreán gréasáin na Comhairle.

Ar fáil ar láithreán gréasáin na Comhairle ag <https://www.dlrco.ie/climate-action-plan-2024> tá an ráiteas iomlán príobháideachta a bhaineann le próiseál do chuid sonraí i ndáil le haighneacht ar an Dréachtphlean Gníomhaithe ar son na hAeráide, 2024-2029.

### Paul Kennedy

Stiúrthóir Seirbhíse

Bonneagar agus Athrú Aeráide

(lena n-áirítear Cothabháil Bóithre agus Trácht ar Bhóithre)

Arna dhátú: Dé Céadaoin, an 20 Meán Fómhair 2023



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

### **SEA Screening Conclusion and Determination**

#### **Modifications to the Draft Local Authority Climate Action Plan 2024 - 2029 for the Dún Laoghaire-Rathdown County Council functional area**

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

Dún Laoghaire-Rathdown County Council has prepared a Draft Local Authority Climate Action Plan (LACAP) for the Dún Laoghaire-Rathdown County Council functional area for the years 2024 - 2029 under Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021,

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

The Modifications to the Draft LACAP have been made following a review of the issues raised during the prescribed public consultation period for the Draft LACAP from Wednesday 22<sup>nd</sup> September 2023 to Friday 3<sup>rd</sup> November 2023 and subsequent consideration by Dún Laoghaire-Rathdown County Council.

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

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

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

- The modifications are only intended to provide clarification on existing Climate Actions defined in the Draft LACAP and make the LACAP more operative and focussed.
- The modification are not material and will not result in any additional, likely significant environmental effects not already considered in the SEA Environmental Report for the Draft LACAP.

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

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

Signed by:



Paul Kennedy

Director of Services - Infrastructure and Climate Change

Date: 12<sup>th</sup> January 2024

## **AA Screening Conclusion and Determination**

### **Modifications to the Draft Local Authority Climate Action Plan 2024 – 2028 for the Dún Laoghaire-Rathdown County Council functional area**

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

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

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

The Modifications to the Draft LACAP have been made following a review of the issues raised during the prescribed public consultation period for the Draft LACAP from Wednesday 22<sup>nd</sup> September 2023 to Friday 3<sup>rd</sup> November 2023 and subsequent consideration by Dún Laoghaire-Rathdown County Council.

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

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

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

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

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

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

Signed by: 

Paul Kennedy

Director of Services – Infrastructure and Climate Change

Date: 12<sup>th</sup> January 2024

