



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

January 2024

**Environment, Climate Action, Active Travel and
Sports Department, Fingal County Council**

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1. Introduction

1.1 Purpose of the Report

Fingal 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 & Buildings, Transport, Flood Resilience, Nature Based Solutions, Circular Economy & Resource Management and Community Engagement.

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

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

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

This Chief Executive's Report on Submissions Received is hereby submitted to the Elected Members of the Local Authority, for their consideration. An update on the Draft Climate Action Plan was given at Climate Action, Biodiversity, Environment Strategic Policy Committee on 20th June 2023, and elected members were briefed on the Draft Plan and on planned public consultation events at a Councillor briefing on the 25th of September 2023. Elected Members will also be briefed at a special sitting of the Climate Action, Biodiversity, Environment Strategic Policy Committee on the 31st of January 2024 and will be provided an overview of the Chief Executive's Report.

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

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

The Minister for the Environment, Climate and Communications formally instructed local authorities on 24th 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 Fingal County Council Climate Action Plan 2024-2029 is 23rd February 2024.

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

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

An Environmental Report accompanies the Draft Climate Action Plan. The Environmental Report contains a detailed analysis of the Draft Climate Action Plan and how the implementation of the Plan would impact on its receiving environment. The Chief Executive's recommendations as set out in this report (including recommendations on the Environmental Authorities submissions detailed in Section 4.16), have been assessed to determine whether they would have any significant impact on the environment. Taking into account the mitigation measures which have already been integrated into the Draft Plan, it is considered that the modifications proposed on foot of recommendations in this Chief Executive's Report, will not have any significant adverse effect on the environment.

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

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

1.3 Background to the Climate Action Plan

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

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

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

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

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

This is necessary to ensure that the environmental, social and economic benefits 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 citizen and stakeholder engagement, all supported by a progressive policy framework.

2 The Public Consultation Process

2.1 Outline of the Public Consultation Process

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

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

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

The Climate Action and Low Carbon Development (Amendment) Act 2021 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 Elements of the Public Consultation Process

Before the Draft Climate Action Plan was published, pre-draft engagement activities were carried out to develop the Draft Plan, as follows:

- Local Authority Climate Action Plan (LACAP) requirements highlighted at the Climate Action, Biodiversity, Environment SPC meeting in December 2022 and at CPG meeting in January 2023.
- LACAP requirements highlighted to the Executive Management Team in April 2023 and plans for engagement workshops discussed.
- LACAP requirements highlighted to the senior team in April 2023 and plans for engagement workshops discussed.
- Numerous cross department engagement workshops held in June 2023.

- Regular updates and engagement at each bimonthly energy team meetings through 2023.
- Regular updates provided through the Chief Executive Monthly Report.
- An update on the Draft Climate Action Plan was given at each of the Climate Action, Biodiversity, Environment SPC Meetings in 2023 including a presentation in June.
- Monthly coordination and collaboration meetings with the Dublin Climate Action Regional Office (CARO), Codema – Dublin’s Energy Agency, and the Dublin Local Authorities (DLA) on the preparation of the Draft Plans.
- Meeting with adjoining Dublin local authorities, Meath, Wicklow and Kildare local authorities held on Friday 28th July 2023.

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

The draft plan, with accompanying SEA and AA reports were physically on display at the following locations:

- County Hall, Swords
- Blanchardstown Civic Office
- Balbriggan Library
- Baldoyle Library
- Blanchardstown Library
- Donabate Portrane Library
- Garristown Library
- Howth Library
- Malahide Library
- Rush Library
- Skerries Library
- Swords Library

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

- Electronically through the Council’s Public Consultation Portal <https://consult.fingal.ie/>
- In writing to the Climate Action Coordinator - Environment, Climate Action and Active Travel Department, Fingal County Council, County Hall, Main St, Swords, Co. Dublin (Postcode K67X8Y2).

Media:

- A social media campaign over X, Instagram and Facebook was carried out over the six-week public consultation period using the #ThisIsClimateAction, proving to be effective. Total impressions of posts by Fingal County Council’s Communications Unit amounted to over 44,000.

Platform	Number of Posts	Impressions
Instagram	24	>10,000
X	22	9,809
Facebook	22	>25,000

Table 2.1 Social Media Post Interactions

- A notice of the public consultation was advertised in the Irish Times on the 20th of September with details on how to make submissions, including viewing availability of hard copies of the Draft Plan, SEA and AA.
- A notice of the public consultation was published on the Fingal County Council website on the 19th of September with details on how to make submissions, including viewing availability of hard copies of the Draft Plan, SEA and AA. <https://www.fingal.ie/news/draft-fingal-climate-action-plan-2024-2029-have-your-say>
- A short video detailing the draft Climate Action Plan was produced and played at all consultation events and made available to the public on the Fingal County Council YouTube Channel and Fingal County Council social media platforms. This video aimed to provide an overview of the draft plan in a concise manner. This video can be viewed here: <https://www.youtube.com/watch?v=RMTCTLR1QoE>
- A regional publicity event took place on the 17th of October 2023 in the Mansion House in conjunction with the four Dublin local authorities and the CARO.
- A joint DLA Radio campaign ran on News Talk, FM104, Radio Na Life, Q102, Spin 103 from 14/10/23 to 28/10/23.

Engagement with Stakeholders:

The following groups and stakeholders were engaged with and notified of the opening of the public consultation. Each group was encouraged to place a submission.

- Elected Members
- PPN
- Local Primary and Secondary Schools
- Chomhairle na N'Óg
- Age Friendly
- Local Enterprise Office (LEO)
- Fingal Chamber
- The Fingal Sports Partnership

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

2.3 Briefings and Public Information Events

A briefing for elected members on the draft Plan took place on September 25th, 2023.

During the public consultation period, three local public information events were held. These events took place in the evening time in County Hall, Swords, Civic Offices Blanchardstown, and the Marine Hotel, Sutton. These events were fully staffed, with staff from the climate action team, relevant departments from Fingal County Council as well as Codema and CARO in attendance to answer the public's queries.

Venue	Date	Time
County Hall, Swords	5th October	5:30pm-8pm
Civic Offices, Blanchardstown	12th October	5:30pm-8pm
Marine Hotel, Sutton	24th October	5:30pm-8pm

Table 2.2. Details of Public Consultation Events

In addition, two further public information sessions were delivered with staff from the Climate Action Team in attendance to answer the public's queries as follows:

Venue	Date	Time
Balbriggan Library	19th October	2:30pm-7:30pm
Rush Library	26th October	2:30pm-7:30pm

Table 2.3 Details of Public Consultation Library Events

An information stand was also set up at the Balbriggan LS Lowry Street Party Climate Action Event. This event was hosted in partnership with Smart Balbriggan, Sustainable Fingal, Our Balbriggan and Recreate.



Figure 1 Four Dublin Local Authorities' public consultation event, at the Mansion House 17th October, 2023

3 Details of the Submissions

3.1 Introduction

A total of 75 valid submissions and observations were received, the breakdown of which is as follows:

Submission Type	Number
Online Portal Submissions	74
Posted / Handed Submissions	1
Total Submissions	75

Table 3.1 Details of Submission Types

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

Note: The headings relating to the categorisation and summary of issues raised, together with the Chief Executive's response and recommendations, follows that of the headings of the Draft Climate Action Plan document.

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

Appendix 1 lists the persons, organisations and bodies that made written submissions. Each submission has been assigned an independent reference. A link to each full submission is also available in Appendix I.

3.3 Summary of Issues Raised in Submissions

There were 75 valid submissions and observations received for the Fingal County Council Draft Climate Action Plan; these were read, analysed and summarised. A total of **441** broad issues / comments were identified from the submissions and observations received. Full summaries of all of the issues raised in the submissions and observations are set out in Section 4, together with the responses and recommendations of the Chief Executive. Issues have been summarised under the relevant chapter, subsection or appendix heading in Section 4 of this report.

Table 3.2 sets out the number and percentage of broad issues that were raised according to the relevant section, subsection or appendix heading of the Draft Climate Action Plan.

Submission Heading	No. of Issues Raised	% of Issues Raised
Department of the Environment, Climate and Communications	3	0.6%
Department of Transport	6	1%
Section 1 Introduction	10	2%
Section 2 The Climate Action Plan Process	3	0.6%
Section 3 Evidence-based Climate Action	7	2%
Section 4 Responding to Risks- Emergency Response Planning	3	0.6%
Section 5.1 Energy and Buildings	52	12%
Section 5.2 Transport	104	24%
Section 5.3 Flood Resilience	30	7%
Section 5.4 Nature Based Solutions	41	9%
Section 5.5 Circular Economy and Resource Management	51	12%
Section 5.6 Community Engagement	50	11%
Section 6 Decarbonising Zone	14	3%
Section 7 Implementing and Reporting	33	7%
Section 8 Other Comments	27	6%
Strategic Environmental Assessment (SEA) and Appropriate Assessment	7	2%
Total	441	100%

Table 3.2: Submission Issue Breakdown

3.4 Chief Executive's Responses and Recommendations

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

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

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

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

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

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

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

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).

Amendments to the text of the Draft Climate Action Plan are identified by their location within the Draft Plan i.e., Section 1 Introduction

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

Action N16 will be reworded as follows: Continue supporting the use of public allotments **and community gardens** as a way for communities to grow their own food, and lower food miles and food waste.

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

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

4 Categorisation, Summary and Responses to Issues Raised

All 75 valid submissions and observations were read, analysed and summarised. The report takes the following format to address issues raised in the submissions and observations received.

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

Submission Reference Number	Submission Summary	CE Response
FIN-C629-77	<ul style="list-style-type: none"> • The submission states that 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. • In making the plan, a local authority shall consult and co-operate with adjoining local authorities, consult with the Public Participation Network in the administrative area. • 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>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 Plan has been developed in accordance with the Local Authority Climate Action Plan Guidelines, as published by the Department of the Environment, Climate and Communications. In developing the Draft Plan the Council was cognisant of the relevant climate strategies, sectoral adaptation plans and government policies.</p> <p>As stated in the Draft Plan, Fingal County Council works closely with the other Dublin local authorities (Dublin City Council, South Dublin County Council, and Dún Laoghaire-Rathdown County Council) and is supported in the delivery of climate action by the Dublin Climate Action Regional Office (CARO) and Codema – Dublin’s Energy Agency.</p> <p>As outlined in Section 6 of the Draft Plan, Fingal County Council has selected an area of Balbriggan, in which to establish a Decarbonising Zone (DZ).</p>

	<ul style="list-style-type: none"> • Each local authority is required to identify a Decarbonising Zone (DZ) in their jurisdiction within their LA CAP. • A monitoring and reporting system to support the LA CAPs will be developed by DECC in collaboration with the local government sector. • The Department funds the Local Authority Climate Action Training Programme to ensure ongoing upskilling for local authority staff and elected members. 	
		CE Recommendation: No change to draft plan.

4.2 Submission from the Department of Transport

<p>The submission outlines at a high level without specific reference to actions within the draft Plan. The submission discusses the Department of Transport's policies under the various categories.</p>		
<p>Active Travel Schemes and Infrastructure</p>		
Submission Reference Number	Submission Summary	CE Response
<p>FIN-C629-14</p>	<p>Active Travel Infrastructure: The provision of safe and accessible walking and cycling infrastructure is key to encouraging modal shift away from private car use and towards walking and cycling. It is important that this capacity remains within the Local Authorities to continue the high level of delivery going forward, and the Department of Transport will work with the Department of Housing, Local Government and Heritage to provide the necessary supports to Local Authorities to ensure this remains the case.</p> <p>It is critical that active travel infrastructure is implemented in a considered manner that has been informed by multi-criteria analyses that consider a range of factors including potential demand, safety, and social benefits.</p> <p>Two cycling strategies are due to be published in the coming months that set out a cohesive cycling infrastructure network. The National Cycle Network (NCN) and CycleConnects. These two strategies will inform future investment by Local Authorities in the coming years.</p>	<p>Fingal County Council welcomes the submission by the Department of Transport and in particular, the positive support the Department has given for the continued delivery of Active travel infrastructure by the Council.</p> <p>Fingal County Council has a large programme of Active Travel initiatives underway at various stages across the county.</p> <p>The development and construction of greenways and the reallocation of existing road space are guided by Planning and Construction Guidelines & Project Appraisal Guidelines produced by both the National Transport Authority (NTA) or Transport Infrastructure Ireland (TII). The guidelines ensure robust multi-criteria analysis is undertaken in determining the optimum route selection for a particular greenway. All cycling infrastructure is designed in accordance with the Cycle Design Manual 2023 or its predecessor the National Cycle Manual. Greenways located in rural areas would in addition take cognisance of the TII standard for Rural Cycleway Design.</p>

Road Space allocation & DMURS		
FIN-C629-14	<p>Decades of focus on dispersal of residential settlements, commercial zones, and workplaces in peripheral areas, instead of concentrating on central areas and locations served by public transport, has led to an over-reliance on the private car... Accessibility requires the creation of permeable paths and street networks that allow users to move through an area directly and via many different routes.</p> <p>Road Space Reallocation</p> <p>This can apply to both Urban and Rural roads and does not just relate to re-allocation for other transport use.</p> <ul style="list-style-type: none"> • From an urban perspective this can relate to the re-allocation to other uses such as for road safety, other uses such as cycling, walking etc or for public realm. <p>DMURS is the principal design standard for all Urban Roads and is to be used in all cases except where a formal derogation has been granted by an oversight body such as TII, NTA or DoT (Regional and Local Roads Division).</p> <ul style="list-style-type: none"> • From a rural perspective it can relate to Quiet Lanes, e.g., using hard shoulders to support road safety or other uses such as cycling, walking etc. Specific guidelines are in development in relation to these, however designers should consider the tools in the TII Standards. 	<p>The Fingal draft Climate Action Plan and the Fingal County Development Plan recognises the need to address over reliance on the private car and the need to reduce transport emissions.</p> <p>The range of Active Travel actions contained in the Draft Plan will progress opportunities to make walking and cycling more attractive and viable. Segregated cycling and walking routes are considered as part of Active Travel schemes, as appropriate.</p> <p>All schemes are designed having regard to the Design Manual for Urban Road and Streets (DMURS) and the national Cycle Design Manual. Accessibility, permeability and connectivity in both new and existing developments is being actively implemented in accordance with the objectives of the CDP and the CDP development management standards.</p>
FIN-C629-14	<p>The importance and role of integrated land use and transport planning in meeting our climate commitments should be addressed in the LA Climate Action Plan.</p>	<p>With regard to development across the County, climate action and transport are core policy objectives of the County Development Plan. The promotion of a compact urban form of development, is a central part of mitigating climate change. The range of policies and objectives of the CDP seek to provide for a consolidated urban form within existing settlements, that are integrated with existing and planned</p>

		public transport and the delivery of social and physical infrastructure. To ensure that the population and employment growth projected for Fingal occurs in a sustainable manner, it is essential that land-use and transport planning continues to be closely aligned. Integrating new housing, employment and services with high-capacity public transport corridors in conjunction with attractive walking and cycling networks and permeable links to rail and bus stations can reduce the need to travel and support the functioning of a connected and sustainable transport system. Land-use policy within Fingal supports development along its identified high-capacity public transport corridors.
FIN-C629-14	Local Authorities and designers need to be aware that it is a legal requirement that all new road related infrastructure should be fully accessible to all users. Measures to ensure this, should be embedded into designs from the outset.	Accessibility in transport is a cornerstone of government policy, guidance and best industry practice. This underpins all works in sustainable transport and is adequately covered in the Climate Action Plan.
EV's		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-14	The submission states that Fleet Electrification is the single biggest mitigation action across all CAP Sectors- 4.72MT CO2 abatement and that the installation of EV infrastructure to facilitate the transition to EVs is an essential component of this transition and that Local Authorities will be developing their EV Infrastructure Strategies for 2025 to 2030 in the coming months which will be carried out in accordance with the: <ul style="list-style-type: none"> • National EV Infrastructure Strategy 2022- 2025 • National EV Charging Network Plan- En Route which was released for public consultation September 2023 • National EV Charging Network Plan - Residential and 	Fingal County Council, in conjunction with the three Dublin Local Authorities, CARO and Smart Dublin, have developed the Dublin Local Authority Electric Vehicle Charging Strategy (2022-2030) to support the transition to Electric vehicles. It sets out the Local Authorities roll in facilitating a coordinated approach to the deployment of EV charging infrastructure. Work has begun on implementing the strategy and will continue under the draft Plan. The Dublin local authorities continue to engage with Zero Emissions Vehicles Ireland (ZEVI), on implementing the strategy and will have regard for the National network plans referenced.

	Destination (for public consultation Q1 2024) • Alternative Fuel Industry Regulations	
Car Parking		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-14	For Local Authorities, one of the measures that they have the ability to affect the most in the short to medium term is on-street and non-residential parking. The national CAP23 encourages the removal of free workplace parking, the increasing of public parking prices to align with market rates, and where it complements measures that prioritise pedestrianisation, active travel and public transport, the removal of on-street parking spaces. Local Authorities should, where possible, align their climate action plans to support delivery of the above objectives as well as paired objectives relating to clean air.	Parking is managed throughout the county in accordance with the Fingal County Council Parking Control Bye-Laws 2020. These Bye-Laws provide for On-street and car park fees. It also provides for prohibited parking and parking restrictions. All the fees are set as per the adopted bye-laws. The Bye-Laws were reviewed and adopted in 2020 with an increase fee for parking. On Street Parking Fees provide for Short Stay Areas, Long Stay Areas, Residents & Visitor Parking, Commercial Parking , Age Friendly Parking, Electric Vehicle Charging Bay, Car Club Licences and Car Parking Fees at Quay Street, Balbriggan, Bridgefield Car Park. A number of on-street Parking Bays used for outdoor dining during and following covid will not be returned to on-street parking. These spaces will be built out to provide for street furniture and bikes. The existing Bye-Laws provides for paid parking across the county which discourages work place parking in all the towns and villages in the county. There is no provision for congestion charges in Fingal. This, alongside the increase in fees for on street and non-resident parking can be considered in the next review of the Bye-Laws.

4.3 Submissions on Section 1 Introduction

Introduction		
Vision/Mission of Draft Plan		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-64	The EHS suggests a vision and/or mission that aims to deliver a healthier Fingal, protecting and promoting health to help deliver the vision of a Healthy Ireland.	Fingal County Council notes this comment made by the HSE in relation to the vision and mission of the Draft Local Authority Climate Action Plan (LACAP) and the increased emphasis on health. The vision and mission of the Draft Climate Action Plan (CAP) encompasses and reflects the national transition objective as outlined in the Climate Action and Low Carbon Development (Amendment) Act 2021 <i>"to pursue and achieve, the transition to a low carbon, climate resilient and environmentally sustainable economy by the end of 2050"</i> . Health and well-being is a key co-benefit of climate action, and this is adequately highlighted in the draft Plan.
		CE Recommendation: No change to draft plan.

Introduction		
Co-Benefits		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-64	The EHS suggest the list of co-benefits for health could be substantially expanded. Just one example might be how climate action can help deliver more sustainable diets for the citizens of Fingal through the promotion of allotments/community gardens.	Fingal County Council notes comments made by the HSE in relation to the co-benefits of climate action to health. The Council acknowledges the significance of health and well-being as a co-benefit of climate action. The list of co-benefits acknowledged within the draft cap is non-exhaustive and balanced.
		CE Recommendation: No change to draft plan.

Introduction		
Targets		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-64	A plan that adapts to climate change and builds resilience for the residents of Fingal.	Comments noted and adequately addressed in the draft Plan as one of the four targets of the draft Fingal County Council Climate Action Plan 2024-2029 is ' <i>To make Dublin a Climate Resilient Region by reducing the impacts of future climate change related events</i> '.
FIN-C629-16	Specific targets could be added, such as “Supporting a 51% (or higher) reduction in Fingal’s overall greenhouse gas emissions by 2030 relative to a 2018 baseline”, and “Reduce the costs of extreme weather events for Fingal by x% over 2024 – 2029 relative to a 2023 baseline” (or similar). It is important that targets refer to the baseline year where applicable, e.g., “51% reduction in the Council’s greenhouse gas emissions by 2030 relative to a 2018 baseline”.	The draft CAP has been drafted in collaboration with the Dublin Local Authorities (DLA) and CARO, the Council will continue to collaborate with the DLA through the implementation of the CAP’s. The draft plan focuses on both mitigation and adaptation actions but is also outward focused and includes a range of actions for which the Council can ‘Influence’, ‘Co-ordinate and Facilitate’ and ‘Advocate’ for other sectors, in meeting their own climate and energy targets thereby reflecting the ‘National Climate Objective’ and an all of society reduction in greenhouse gas emissions of 51% by 2030. Baseline years are listed on page 25 of the draft Plan.
FIN-C629-16	We would like to highlight the requirement to focus on both mitigation and adaptation equally. Adaptation actions should not detract from the need to continue to urgently focus on mitigation. We feel that being climate neutral by 2050 is too low a target (albeit in keeping with the Low Carbon Development (Amendment) Act 2021) and suggest changing that to 2040 at least, as others have done.	The targets and actions in the draft CAP are in accordance with the National Climate Objective which aims to pursue and achieve climate neutrality by no later than 2050. The National CAP 2023 has set a pathway to achieve this objective. The Draft CAP is in keeping with this national objective and the National CAP 2023 and associated public sector targets. National Funding provision will also be in accordance with the national objective.
FIN-C629-18	Fingal has played a leadership role as a Local Authority in many of the relevant areas, and can continue that role. However, we recommend that Fingal sets more ambitious goals, for instance by moving the target for	

	<p>climate neutrality from 2050 to 2040, if not sooner - as other local authorities have done. GAP welcomes the fact that the Action Plan is situated explicitly in the wider policy context, as set out on page 14. At the same time, it would have been helpful to have included clear references to an overall strategy for the entire Dublin region (even if some of the targets on page 16 do refer to Dublin as a whole). The document is also good on setting out the wider context of climate change and the climate action required in response.</p>	
FIN-C629-5	<p>Plan Introduction: Targets do not include a target for Fingal to play its part in the national plan for carbon reduction, specifically by promoting the generation of clean electricity.</p>	<p>The targets in the draft plan will play a part in the National Objective by aiming to achieve the energy efficiency improvements and carbon emission reduction targets set for public sector organisations under the National CAP 2023. The Council will promote the generation of clean electricity through the implementation of actions in the Energy & Building (E12, E25, E26, E27, E28) and community engagement sections (C1, C10) of the draft Plan and through existing Council Policies.</p>
FIN-C629-64	<p>The EHS suggests that target 3 seeks to make Dublin a region resilient to climate threats that affect health but also seeks to deliver on the opportunities for health gain presented by climate action. For example, more active travel should deliver healthier people in terms of addressing physical inactivity and cleaner air. Target 4 should make the healthy choice for people the easy choice...</p>	<p>The targets are in keeping with the National Climate Objective and the National Climate Action Plan 2023. The draft CAP emphasises the associated health benefits of climate action throughout – including on page 18 and in each of the six thematic action areas. The draft CAP strives to empower individuals and communities to make sustainable behavioural and lifestyle changes through the actions across the six thematic areas and in particular through the provision of active travel infrastructure and through actions in the Community Engagement section.</p>
		<p>CE Recommendation: No change to draft plan.</p>

Introduction		
Just Transition		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-18	The submission acknowledges the importance of Just Transition and suggests that the cost of the transition as well as the benefits of the change are spread equitably across society.	Fingal County Council welcomes comments in relation to inclusivity. As stated in the targets of the Draft Fingal County Council Climate Action Plan 2024-2029, this plan aims to facilitate a just transition across the County. This ensures that the transition towards meeting the National Climate Objective happens in a way that leaves no one behind. This is reflected in the actions in the draft Plan from energy efficiency retrofits of social housing to the provision of active travel infrastructure for all and the provision of services, facilities, training and empowerment actions.
FIN-C629-64	In the context of SDG 3 – Health for All of All Ages the EHS wishes to stress the importance of finalising a Climate Action Plan that is inclusive and leaves no one behind.	
		CE Recommendation: No change to draft plan.

4.4 Submissions on Section 2 The Climate Action Process

Climate Action Plan Process		
Engagement and Consultation with Stakeholders		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-57	Extensive collaboration with all neighbouring local authorities is required. If lower standards are allowed in one county, it makes it more difficult for neighbouring local authorities to apply higher standards (e.g., for car parking spaces). In simple terms, collaboration and consistency are critical.	Fingal County Council notes and agrees with comments made by the Irish Green Building Council in relation to collaboration with neighbouring local authorities. In preparation for the draft Local Authority Climate Action Plan, Fingal County Council engaged with the Dublin Local Authorities, Meath County Council and Kildare County Council.
FIN-C629-64	It's not clear if state agencies with responsibility for public health were consulted or participated in the development of the draft plan. The EHS suggests a list of agencies who participated or were consulted in the development of the plan is included as an appendix to the final plan. Health relevant documents such as the Healthy Ireland Framework and the Dept. of Health Adaptation Plan 2019 – 2024 could also be included in the list of references for example.	The draft Fingal County Council Climate Action Plan has been developed in line with the requirements stated in the Climate Action and Low Carbon Development (Amendment) Act 2021. As such the Council consulted with statutory consultees and with neighbouring local authorities. The public consultation was open to all and all bodies who engaged with Fingal County Council during the public consultation process are listed within the appendices of this report.
FIN-C629-22	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. 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	As detailed in Section 1 Introduction, the draft Fingal County Council Climate Action Plan has been prepared having regard to a broad range of international, national, sectoral, regional and local plans, policies and legislation. The implementation of the Draft CAP and any variation or revision to the Plan, will have regard to all relevant plans and legislation, including those noted in the EPA submission.

	<p>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>CE Recommendation: No change to draft plan.</p>

4.5 Submissions on Section 3 Evidenced Based Climate Action

Evidenced Based Climate Action		
Climate Change Risk Assessment		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-51	Refer to the fact that climate change is a significant driver of biodiversity loss and that the two issues are intertwined. Treat the climate and biodiversity crises as an ongoing emergency situation and major public health risk.	Fingal County Council notes this comment and agrees that both climate change and biodiversity are interlinked. The draft Fingal County Council Climate Action plan has been prepared in line with Fingal County Council strategies and plans that support biodiversity such as the Fingal Biodiversity Action Plan and The Tree Strategy-Forest of Fingal. Through the implementation of climate adaptation and mitigation actions in this Plan, the Council is working to improve the resilience of the County, to increase the carbon sequestration potential within the County, and to protect and enhance valuable ecosystems which will result in benefits to biodiversity.
FIN-C629-70	Simple & updated Risk Assessment Advice & information & advice given regularly to individual villages & towns in Fingal.	The Major Emergency Management Unit, supported by the Council's operational teams are continually improving the Council's understanding and response to current climate related risks. As part of the Council's response, risk assessments are undertaken to determine the most appropriate actions to mitigate against the effects of the climate emergency. For each event, the Council develops a communication plan which informs all stakeholders including members of the public, of the current situation and any actions that need to be taken. The draft Plan under the theme of Community Engagement, includes actions C2, C3, C4 & C5 which will provide information and deliver awareness events in relation to climate action.

FIN-C629-64	The EHS recommends an expanded Climate Change Risk Assessment is undertaken to assess risks other than those associated with severe weather, which tend to be acute and sudden onset in nature, and assess some of the more gradual, slow onset effects. This may include the effect on asthma rates during a longer growing season as well as gradual changes in infectious disease trends such as the threats posed by vectors such as rats, cockroaches and mosquitos for example.	Fingal County Council notes this comment made by the HSE in relation to the Climate Change Risk Assessment. The Climate Change Risk Assessment was prepared in line with guidance issued by the Department of Environment, Climate and Communications. It is considered that asthma and infectious diseases are outside the scope of the local authority climate action plans.
		CE Recommendation: No change to draft plan.

Evidenced Based Climate Action		
Baseline Emissions Inventory		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-16	<p>P.29 of the draft plan states that “Data centres represent 13.1% of the commercial sector’s emissions”. It is not clear if this is 13.1% out of the 31% for the sector (i.e., 4.06% of the total for Fingal) or 13.1% of the total for Fingal. Please can you clarify which applies in the final version of the document.</p> <p>Finally, for this section, we acknowledge that this is a draft document, however, it has been made accessible to the public and regrettably, most of the figures on p.28 are not fully legible, as they appear to have been cut and pasted from the original reference material. It is important that all key figures, tables, graphs etc. are fully legible in the final document.</p>	<p>To clarify the point regarding data centre emissions, they account for an estimated 13.1% of all emissions produced in County Fingal. The emissions in the pie chart shown on p.28 are categorised under commercial emissions (i.e., 13.1% data centres + 17.9% other commercial emissions). For the purposes of emissions quantification in the Local Authority Climate Action Plans 2024-2029, a baseline year must be set, and emissions quantified from it. Data was taken from the year 2018 as a baseline as mandated by the National Climate Action Plan 2023 (Baseline set as 2016-2018) and the Department of Environment, Climate and Communications guidelines for Local Authority Climate Action Plans.</p> <p>The Council will improve the legibility of the figures on page 28. See CE Recommendation below.</p>

FIN-C629-64	<p>The emissions profile data for Fingal itself and emissions within the county makes for very interesting reading. One question to ask is if the council needs to include emissions from staff getting to and from work in its profile? The same question applies to suppliers and sub-contractors used by Fingal CC?</p> <p>The EHS recommends that indirect or scope 2 and 3 emissions be considered in the emissions profile for Fingal CC and actions include ways to reduce those emissions. Blended working arrangements for some staff is an example of a potential solution in this area.</p>	<p>The draft Plan considers the Scope 1 and Scope 2 (indirect GHG emissions associated with the purchase of electricity, or heat) emissions of the Council and the County as per the Department of Environment, Climate and Communications LACAP Guidance. The emissions produced by staff coming to and from work in this instance would fall under the category of Scope 3.</p> <p>Blended working arrangements will assist in the reduction of Scope 3 emission as there would be less staff commuting, however home working would then need to be considered.</p> <p>The draft Plan includes six actions which will reduce staff travel and the need for staff travel under the Transport theme and staff travel section, actions T30-T35.</p>
		<p>CE Recommendation: The Council will improve the legibility of the figures on page 28 of the draft Plan.</p>

Evidenced Based Climate Action		
Adaptation		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-64	<p>Be wary of Maladaptation. Some adaptation measures can be harmful (unintended and negative impact) and the plan must assess the potential harmful effect on population health. For example, some efforts to enhance biodiversity may support the proliferation of disease transmitting vectors or take away informal play spaces for children.</p>	<p>Fingal County Council notes this comment made by the HSE.</p>
FIN-C629-64	<p>Reference should be made to the Dept. of Health Adaptation Plan 2019 – 2024 which is to be updated in 2025 to help determine actions that affect public health.</p>	<p>Fingal County Council's draft Climate Action Plan is prepared in line with the National Adaptation Framework as stated in the Climate Action and Low Carbon Development (Amendment) Act 2021 and guidelines provided by the Department of Environment, Climate and</p>

		Communications "A local authority climate action plan shall, in so far as practicable, be consistent with the most recent approved climate action plan and national adaptation framework".
		CE Recommendation: No change to draft plan.

4.6 Submissions on Section 4 Responding to Risks- Emergency Response Planning

Responding to Risks-Emergency Response Planning		
Scenario Planning		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-16	This section of the plan is very high-level. Does the Council carry out scenario planning to detail how it would respond to different types of emergencies specific to Fingal? Does it carry out lessons-learned exercises following major incidents and use these to improve future responses?	<p>The Major Emergency Management Unit and supporting Operational teams are continually improving the Councils response to emergencies and have learned from each event.</p> <p>Scenario planning is carried out by these teams to ensure preparedness and improve future responses to Major Emergency Events. In relation to severe weather events, Fingal County Council's Severe Weather Assessment Team carried out a review of procedures following Storm Debi to ensure improvements were in place for subsequent severe weather events. Fingal County Council is involved in various training and exercise events in conjunction with Major Emergency Management East Region Working Group. For example, Fingal County Council has been involved in tabletop and live exercises in relation to 'Control of Major Accident Hazards'(COMAH) regulated sites within the Fingal administrative area. Fingal has also carried out training at various levels in relation to the MEM framework structures and organised multi agency tabletop exercises for crowd events within the Fingal administrative area.</p>
		CE Recommendation: No change to draft plan.

Responding to Risks-Emergency Response Planning

Responding to Risks

Submission Reference Number	Submission Summary	CE Response
FIN-C629-64	<p>This section refers to a Major Emergency Management Unit and the development of a Major Emergency Management Plan. Its unit utilises the Emergency Management Framework. While not captured on the Fingal Plan it is graphically represented in the South Dublin CC Plan and is understood to include hazard analysis, mitigation, planning and preparedness, response, and recovery. While not defined a Major Emergency is understood to be severe weather event and sudden onset related which appears too narrow in the context of climate change.</p> <p>As stated earlier the Climate Change Risk Assessment should be expanded to assess all risks to life and property in Fingal linked to climate change. Infectious disease risks should be assessed, and these can be waterborne, foodborne and vector borne. One also needs to be mindful of the regional and global climate perspective and one can expect climate “migrants” to arrive in Fingal if not already doing so...</p> <p>The EHS recommends a Rapid Response to the existing Climate and Biodiversity emergency. This rapid response should expand upon the existing Emergency Management Framework to include Prevention (after the hazard analysis and before mitigation) and in Recovery to stress the importance of Building Back Better, Safer and Stronger.... Prevention in relation to the risk of flooding for example goes beyond</p>	<p>The draft Plan sets out the Councils approach to Emergency Management at a high level and sets out that as part of the Emergency Management East Region, Fingal County Council liaises with the Dublin local authorities, the HSE, An Garda Síochána and others in relation to emergency management. Risk assessment of infectious diseases is out of scope of a Local Authority Climate Action Plan. Flood prevention is dealt with in the Flood Resilience theme of the draft Plan.</p>

	engineering or nature-based solutions but also includes building capacity in communities and reducing their vulnerability.	
		CE Recommendation: No change to draft plan.

Responding to Risks-Emergency Response Planning		
Community Training & Aid		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-71	Community training for dealing with emergency situation should be carried out also financial aid plans should be developed for known and potential impacts.	Where an emergency weather warning is issued trained Council personnel provide a response. It's important that only trained personnel with the proper PPE should be involved in such work. As with the recent flooding events in Cork and Louth, the State through a number of Government Departments provides financial aid packages to those impacted.
		CE Recommendation: No change to draft plan.

4.7 Submission on Section 5 Energy and Buildings

Energy and Buildings		
Housing Retrofits		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-64	The EHS recommends that cooling is 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.	Fingal County Council are carrying out ongoing overheating assessments and as part of the HPI assessments being introduced on all new social housing (action E20). Cooling typically uses significant energy and does not usually form part of a comfort and energy efficiency strategy for social housing. Fingal County Council will review in the context of the overheating studies.
FIN-C629-66	European funding for home retrofits is set to increase in the years to come. DCC must prepare for this by scaling up its capacity to retrofit its own housing stock to at least a B2 energy rating.	Increased funding is welcome, and we will review our targets in line with funding.
FIN-C629-72	The Fingal Green Councillors want Fingal County Council to develop a plan to retrofit all stock by 2030 for a number of important reasons. Firstly, it serves as a crucial element in our collective efforts to combat climate change. By enhancing energy efficiency and reducing carbon emissions in residential buildings, we make substantial progress toward environmental sustainability. Additionally, this initiative acts as an economic driver, stimulating growth in the green technology and construction sectors, and generating employment opportunities. Homeowners stand to benefit from increased comfort, improved safety, and reduced utility	<p>The draft Plan includes action E17: <i>'Continue to make energy efficiency retrofits to social housing under the DHLGH-supported Energy Retrofit Programme. Ensure that all of FCC's social housing stock has a B2 or cost optimal energy rating by 2030'</i>. Through the implementation of this action – the Council will aim to ensure all stock is retrofitted to B2 by 2030.</p> <p>Fingal County Council recognise the challenges of co-owned developments but also multi-tenant buildings or terraces. This can present challenges for retrofit.</p>

	<p>expenses.</p> <p>There is potentially a particular role as regards the retrofitting of multi-unit developments. This is a particular challenge from co-owners of such developments. It is likely that the institutional knowledge in Councils, plus in some cases ownership of units, means that the Council is in a particular position to help. We recommend an action to explore this possibility.</p> <p>Establishing a target of 2030 provides a clear roadmap, aligning with the national CAP it ensures all residents in Fingal fully understand the work needed to meet our climate targets and decarbonise their energy. It also provides FCC staff with clear objectives and goals.</p> <p>We should showcase the best practice in our retrofitting projects for the benefit of multi unit developments, Sustainable Energy Communities and individual homeowners</p> <p>We should rely on embodied carbon analysis tool in our retrofitting and publicise the results achieved.</p>	<p>The Council will consider further showcasing of retrofitting projects to the wider community.</p> <p>Agreed</p> <p>Agreed</p> <p>Fingal County Council have begun whole life costings (WLC) calculations and investigations on projects. This will also form part of the home performance index (HPI) assessment process on new social housing per action E20.</p>
		<p>CE Recommendation: No change to draft plan.</p>

Energy and Buildings		
Building Assessment Accreditation		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-50	Please include a commitment to engage with independent BREEAM assessor and utilise Building Assessment Methodology throughout delivery of the Our Balbriggan project.	Fingal County Council will apply indicators from both BREEAM and the Build Upon Energy Renovation Framework to the Our Balbriggan projects along with assessing any new social housing elements to schemes under the Home Performance Index assessment method, a method equivalent to BREEAM tailored to housing in Ireland. The Council will consider independent assessors where suitable.
FIN-C629-72	Action E8 about the Council's use of BREEAM and our consideration of the climate impact of materials used by the Council and by bodies which we support with grants, should relate to all relevant building projects, not just the Swords Cultural Quarter.	Fingal County Council are assessing all new social housing using the Home Performance Index assessment method, a method equivalent to BREEAM tailored to housing in Ireland. Fingal County Council will extend the assessments under the various indicators from BREEAM and the Build Upon Energy Renovation Framework to Public Buildings as learned in the pilot Swords Cultural Quarter project. See CE Recommendation below.
FIN-C629-52	Under Energy Efficiency Improvements & Upgrades E10 BER Audits to be carried out on corporate buildings and libraries to determine BER ratings # of BER Audits carried out. What will be done with these BER ratings? Simply identifying the BER of a building it not enough. This should be used to establish areas of effective and feasible improvement.	Fingal County Council is currently in the procurement stage of a broad BER and Audit programme, which will capture all its corporate facilities and libraries on a phased basis (Action E10). The details of the BER reports and energy audits will form the basis of a targeted energy improvements programme, under schemes such as DeliverEE and Pathfinder (Actions E12, E15), which are aimed at increasing the facilities' energy performance and working towards the decarbonisation goals of the Council.
FIN-C629-57	The inclusion of recommendation E20 is positive as fully aligned with climate targets and local authorities' objective of leading by example.	We look forward to progressing projects assessed using the HPI.
FIN-C629-66	Biodiversity-inclusive designs for social housing could leverage the city's response to the housing crisis to promote ecological sustainability.	The Council notes this comment. Biodiversity net gain forms part of the design process on new build projects and as assessed under the HPI process.

FIN-C629-57	<p>On tracking progress, while the suggested reporting frames are good, we would like to encourage Fingal CoCo to use the Build Upon Energy Renovation Framework to capture data on the impact of its renovation programme. The framework was developed in close collaboration with Dublin City Council (Cork City, Laois and Offaly County Councils), and includes 15 environmental, social and economic indicators...</p>	<p>Fingal County Council will review pilot schemes using indicators from the Build Upon² Energy Renovation Framework with the intention of applying to further stock post the initial projects and welcome the generous assistance from the IGBC in providing the relevant tools.</p>
FIN-C629-57	<p>The carbon modelling report commissioned by the IGBC to a group of researchers at UCD, shows that Ireland cannot reach its climate targets without addressing embodied carbon emissions in construction and the built environment*. Consequently, and given that local authorities must lead by example, the IGBC would like to encourage FingalCoCo to take actions to address whole life carbon (WLC) emissions in the built environment -e.g., by measuring the WLC impact of new projects... The IGBC, with support from SEAI, is working on the development of a national methodology to measure WLC that is aligned with the European Framework for Sustainable Buildings – Level(s) and would be happy to collaborate with Fingal CoCo on same...</p>	<p>Fingal County Council have begun WLC calculations and investigations on projects. This will also form part of the HPI assessment process on new social housing per action E20. The Council welcome the work developing a national methodology to measure WLC that is aligned with EU Levels and will review as it emerges.</p>
		<p>CE Recommendation: It is recommended that the following action is amended - Action E8 will be reworded: Engage with independent BREEAM assessor and utilise Building Assessment Methodology throughout delivery of Swords Cultural Quarter flagship project; and extend the assessments under the various indicators from BREEAM and the Build Upon Energy Renovation Framework to Public</p>

Buildings. BREEAM is a leading validation and certification system for sustainable built environment.

Energy and Buildings		
Reusing Building Stock		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-57	Introducing actions to support a greater re-use/use of the existing building stock, and to bring as many vacant/underused properties back into use through high quality renovations we can tackle several challenges at once. As highlighted in the carbon modelling report commissioned by the IGBC to UCD, The carbon cost of a home deep retrofit is approximately ~0.25 of that of new build, and as many of these homes are located in central locations, people would be less reliant on cars, which in turn would reduce our fastest growing source of carbon emissions, transport.	Fingal County Council recognises the advantages highlighted.
FIN-C629-57	Explore how Fingal CoCo could better use its existing building stock*. This would be fully aligned with the concept of “sufficiency” introduced in the proposed revision of the EPBD and would support a reduction in embodied carbon and waste emissions. * Could public buildings be used for longer hours and for different use?	Council building stock is generally very well utilised. The Community Centres are already used extensively, especially during extended evening hours, to accommodate local clubs, societies, meet-up groups, and sports activities, which is the primary purpose of these facilities. Several community facilities are utilised for classes (teaching), dance & religious (cultural) use along with sports, exercise and much more.
FIN-C629-57	Introducing financial incentives to support reuse and low carbon developments. This may include increasing levies on vacant properties, applying an additional planning levy (or increased rates) to new construction	The present government approach levies has been to waiver them and not increase levies for new residential developments, under the Government’s Housing for All Action Plan, to speed up the construction of new homes by reducing building costs for developers.

	where major demolition is involved, or reducing planning levies for buildings of low carbon intensity (i.e., with 3rd party validated low carbon intensity as defined by benchmarks in RIAI climate challenge)	Under the Climate Action Plan 2024. The government is committed to having in place a taxation framework that plays its part in incentivising, along with other available policy levers, the necessary actions to reduce our emissions and are committed to regularly reviewing key direct and indirect environmental tax measures to assess their potential to further support our decarbonisation objectives, including assessing the role for taxation measures, in meeting our building retrofit targets set out in this plan.
		CE Recommendation: No change to draft plan.

Energy and Buildings		
Renewable Energy		
Submission Reference Number	Submission Summary	CE Response
Solar Power		
FIN-C629-6	Consider Solar farms, example in Meath off the Ratoath Road	Fingal County Council notes this comment. The Council has committed to identify opportunities to develop renewable energy projects. This work is accounted for in the draft plan under action E26 'Assess potential for viable renewable energy projects on a temporary/permanent basis on council-controlled lands'.
FIN-C629-6	Streetlights should all be changed to LEDS. Easing the Planning rules around solar panels on residential roofs and also to allow for panels to be fitted in rear gardens where roofs are not considered suitable. Make planning easier for the provision of bike stores to front gardens, simplify the process for this application.	There is an exemption from planning permission for solar panels on residential roofs, where the development complies with the criteria outlined in the Planning & Development Regulations, as amended. Any planning application for, whether for bike storage or similar, would be considered on its own merits.
FIN-C629-56	daa supports the actions of the council in relation to energy reduction. However, we would welcome opportunities to work with Fingal on the following: E27 – solar PV panels. daa understand the importance	Noted.

	of maximising opportunities for on-site renewable energy generation to support energy independence and energy security. We would welcome the opportunity to further explore ways for solar PV energy generated to be shared or work in partnership to investigate the potential to store the energy for distribution.	
Offshore Wind		
FIN-C629-56	E28 – daa supports the potential for offshore wind energy. We would welcome the opportunity to work with Fingal to identify suitable sites for wind farms in the vicinity of the airport or work on all wind farm locations both on and offshore. We would like to note that we would need to be consulted regarding any third-party wind turbines in proximity to the airport, to safeguard against interference with radar and equipment, or create an obstacle.	Noted.
FIN-C629-52	Under Energy Planning & Renewables E28 “Develop Wind Energy Strategy” It is noted that this will be developed by 2028. However, the CLIMATE ACTION PLAN 2023 CAP23 envisages many actions within 2023 and 2024 to Accelerate Renewables. Eg Offshore Wind Delivery Taskforce: Publish a system-wide plan for the delivery of ORE in Ireland EL/23/9 page 142 It should be envisioned that the timelines of individual local actions should align and feed into the national plans.	It is appropriate that the National CAP will prioritise enabling renewable energy actions. Timeframes in the draft CAP are for completion of actions and the Wind Energy Strategy will be completed before 2028.
Anaerobic Digestion		
FIN-C629-56	While not included within the Draft Climate Action Plan, daa see a significant opportunity to work with Fingal and other partners to find collective solutions	The Council supports anaerobic digestion through existing policies. The draft plan includes actions to assess potential for viable renewable energy

	for the generation of energy from waste through anaerobic digestion. This technology is only viable where there is adequate volume of feedstock, requiring collective action to achieve this.	projects on a temporary/permanent basis, on council-controlled lands (E26).
Electricity		
FIN-C629-5	There is no mention under "Green Infrastructure" of what Fingal itself could do to pro-actively to facilitate the green generation of electricity.	The draft CAP and the Fingal County Development Plan 2023 - 2029 has significant support for renewable electricity generation. The term Green Infrastructure is well described in the draft CAP and doesn't generally include green electricity
FIN-C629-19	Energy efficiency improvement is a key sustainability measure to help ensure water and wastewater services are resilient to climate change and for developing a low greenhouse gas emitting water and wastewater service. Uisce Éireann accounts for 21% of public sector electricity consumption and is by far the largest consumer of electricity in the public sector. We are therefore focused on improving energy efficiency in asset design, upgrades, lighting and heating, transport and process, as well as on renewables such as PV, wind and biogas, and focusing on reducing demand (Use Less), particularly in the context of the current energy crisis. We have made significant progress on our journey to become an energy efficient, low carbon, sustainable water utility. We have achieved over a 34% improvement in our energy efficiency. We are developing plans to try and move towards net zero carbon, including further development of renewable energy sources on our assets, delinking energy use from greenhouse gas emissions.	Eliminating emissions from Irelands water and wastewater services will be a significant component of the net zero transition. As a public utility, Uisce Éireann's collaboration with local authorities will be an important part of achieving the targets of the LACAP's. In addition to water and wastewater treatment infrastructure, Codema will look into district heating to recovering waste heat from wastewater network.

	We welcome the commitment in the plan to district heating schemes and we would welcome the opportunity to explore potential 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.	
FIN-C629-55	Encourage adoption of renewable energy sources, including incentives	The Economic Development and Property Services Sections of the Council will encourage and promote renewable energy sources, including research & development into renewable energy. The Economic Development Section has objectives in this regard in the Draft LECP 2023 - 2028 which will be adopted by the Council in Q1 2024. Financial incentives are currently provided through other bodies including SEAI and LEADER. The Council will seek to identify and promote alternative funding streams to promote the adoption of renewable energy sources and the associated delivery of required infrastructure.
		CE Recommendation: No change to the draft Plan.

Energy and Buildings		
Energy Sources and Use		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-35	The Government have set an ambitious target for biomethane production in Ireland of up to 5.7 TWh by 2030, which equates to approximately 10% of current gas usage in Ireland. The Government also recently published the National Hydrogen Strategy, setting out the strategic vision on the role that hydrogen will play in Ireland's energy system.. Gas Networks Ireland suggest that the new Fingal County Council's Climate Action Plan references both. In addition, Compressed	<p>The draft Plan addresses the Councils approach to the electrification of the Council fleet. The Fingal County Development Plan 2023-2029 supports biomethane production.</p> <p>Fingal County Councils Energy Agency, Codema agree that green hydrogen can potentially be used as a green fuel to produce power when renewable electricity from wind or solar is not available or to fuel heavy transport. Codema believes green hydrogen should only be supported for use in certain applications where the heat supply cannot already be supplied</p>

	<p>Natural Gas (CNG) can play a key role in the decarbonisation of Heavy Goods Vehicles (HGV), particularly when combined with biomethane (bio-CNG), and contribute to air quality improvement.</p>	<p>more efficiently and more cost-effectively through renewable and waste heat sources (e.g., through district heating and heat pumps). Thus, in terms of green hydrogen and biomethane, their use will be mainly for high-energy applications where lower cost alternative do not already exist. (e.g., dispatchable power generation). The use cases where green hydrogen may be supported include industry (where it is used as a feedstock), shipping, long-haul aviation, and seasonal power storage. Green hydrogen is highly unlikely to be viable for domestic or commercial heating.</p> <p>In recent times, the potential to use existing gas networks to transport green hydrogen (hydrogen produced by electrolysis using green electricity) has been discussed as a possible solution for decarbonising space heating and hot water preparation (<100°C). There are a number of factors that will not make this possible in the short to medium term and makes adopting in the long-term challenging. The reason for Codema’s position on green hydrogen when it comes to lower temperature heating is that better alternatives already exist for providing heat at this temperature, which are not subject to the same uncertainties around viability that green hydrogen is.</p>
FIN-C629-47	<p>Fossil Fuel Infrastructure</p> <ul style="list-style-type: none"> •Phase out fossil fuels including gas. •Include planned phasing out of existing connections to the gas grid. •Ban fracked gas in the energy mix. •Rule out any new fossil fuel infrastructure projects. <p>Specific attention was brought toward the need to prevent any new liquefied natural gas plants. New gas infrastructure is not required for energy security. Ireland should also not be complicit in importing fracked gas.</p>	<p>With regards to fossil fuels, at a local level, local authorities have to meet a number of legal climate action obligations and targets, and Fingal County Council is working towards meeting both EU and national targets. On the Road to a Carbon Neutral 2050, reducing fossil fuel demand is a critical priority for Ireland. Significant progress has been achieved in driving energy efficiency and retrofit policies needed to decrease demand and the use of fossil fuels. In line with this, Ireland is updating its heating policy by phasing out fossil fuel use in the heating sector and transitioning to a renewable-led system. Under annual climate action planning processes, the Government and regional authorities continue to drive policies that reduce Ireland’s dependency on fossil fuels, including natural gas for heat generation, and this in turn will be a significant contributor to greater energy security in Ireland.</p>

		<p>Actions in Energy Security in Ireland to 2030 address the gas grid and the need to identify ways for the grid to support Ireland's pathway to carbon neutrality. Action 16 in the Energy Security in Ireland to 2030 report states that 'To ensure a fit-for-purpose gas grid, that supports Ireland's energy and climate ambition the role of natural gas will decrease so the review will look to identify where the gas network can be repurposed, or decommissioned, promoting cost effective energy system integration where possible in achieving our decarbonisation and security objectives.'</p> <p>Overall gas demand is forecast to reduce between 2021/22 and 2030/31. With a growing population and a growing economy, Government policy prioritises a reduction in demand for fossil fuels. The National Retrofit Plan (NRP) sets out how the Government will deliver on Ireland's retrofit targets. Ireland has implemented standards for energy performance in buildings including requirements for Nearly Zero Energy Buildings (NZEB) were introduced for buildings other than dwellings in 2017 and dwellings in 2019. As a result of these NZEB performance requirements, heat pumps are installed in 88% of new dwellings and it is expected that all fossil fuel boilers will be fully phased out of new dwellings by the end of 2024.</p> <p>As for fracked gas, the Energy Security in Ireland to 2030 report includes a Major Policy Statement on the Importation of Fracked Gas:</p> <ul style="list-style-type: none"> • This Policy Statement was published pending the outcome of the review of the security of energy supply of Ireland's electricity and natural gas systems. • It stated that it would not be appropriate to permit or proceed with the development of any Liquefied Natural Gas (LNG) terminals in Ireland. • It also highlighted that in the context of European Union treaties and the laws governing the internal energy market, it is considered that a legal ban on the importation of fracked gas could not be put in place.
FIN-C629-47	<p>The Climate Action Plan should include actions which incentivise community energy projects...</p> <p>The Climate Action Plan should prioritise safeguarding against Energy Poverty..</p>	<p>Under the draft Plan, the Council aims to incentivise community energy projects through the administration of the Community Climate Action Fund. The Council is retrofitting social housing under the draft Plan and</p>

	<p>The Climate Action Plan should contain measures to ensure that energy demand is managed responsibly and sustainably..</p> <p>We must reimagine and rebalance energy ownership, transitioning away from the current developer-led for-profit approach. Energy democracy includes both state and community ownership....</p> <p>Community energy consists of community based projects, organisations and social enterprises involved in the energy sector, owned and operated by local people and local authorities in the community...</p>	<p>helping to safeguard against energy poverty. The draft Plan contains various actions around energy efficiency improvements.</p> <p>In relation to Public and Community Ownership of Energy. The Council is not an energy provider. Public Ownership of Largescale Renewable Energy is for consideration by Government under the National CAP. The Council facilitates local communities and organisations to invest in renewable energy infrastructure through actions in the Draft CAP and through supporting County Development Plan Policies and Objectives.</p>
FIN-C629-69	This submission is the same as above, FIN-C629-47 which was submitted first.	
		CE Recommendation: No change to draft plan.

Energy and Buildings		
District Heating		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-56	E25 - daa would also welcome the opportunity to work with Fingal to investigate the potential for the offtake of waste heat and the creation of a District Heating Scheme at Dublin Airport.	Noted
FIN-C629-66	While I welcome the initiative to introduce district heating for residential buildings, more ambition would be welcomed here, and plans to use district heating to heat public buildings too.	Public Sector Buildings are the anchor tenants for the district heating scheme in Dublin 15.

FIN-C629-19	We welcome the commitment in the plan to district heating schemes and we would welcome the opportunity to explore potential 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.	Eliminating emissions from Irelands water and wastewater services will be a significant component of the net zero transition. As a public utility, Uisce Éireann's collaboration with local authorities will be an important part of achieving the targets of the LACAP's. In addition to water and wastewater treatment infrastructure, Codema will look into district heating to recover waste heat from wastewater network.
		CE Recommendation: No change to draft plan.

Energy and Buildings		
Data Centres and High Energy Users		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-5	Fingal's Actions are contrary to national carbon reduction aims and contrary also to its own stated aims in its Climate action Plan Fingal has recently approved three new data centres for amazon. Experts have warned these could consume 30% of Ireland's electricity by 2030 and demand up to 80Mw of electricity. Given that more than half of Ireland's electricity is generated by oil and gas, Fingal is making demands on electricity generation that cannot be met by green generation within the timeframe set by Ireland's commitments to reduce carbon output.	As Eirgrid operate and manage the electricity grid they are best placed to assess whether a data centre or any other large electricity user should be granted a grid connection. Eirgrid's primary objectives are to ensure the grid operates well and to "Lead the island's electricity sector on sustainability and decarbonisation" and have all the relevant information to make a well-informed decision on connections to ensure "a safe, secure and reliable supply of electricity on the island of Ireland" as stated in their Group Strategy. This would include assessing any potential risks brought about by connecting large electricity users. Eirgrid use a 2-stage engagement procedure before granting connections and the first of these occurs before the data centre applies for planning permission. As a result, Eirgrid are best placed to decide on whether data centres should go ahead or not. The CRU published on 23 November 2021 the "CRU Direction to the System Operators related to Data Centre grid connection processing". This decision allows the data centre industry to continue to connect to the electricity grid, subject to certain conditions. New data centre connections
FIN-C629-5	There is no mention of imposing a requirement on new industries that have high electricity demands on being obliged to generate their own electricity using clean technology, eg solar panels.	

		are required to have on-site generation (and/or battery storage) that is sufficient to meet their own demand and, to assist in full decarbonisation of the power system, this generation should also be capable of running on renewably sourced fuels (such as renewable gas or hydrogen) when supplies become more readily available.
FIN-C629-16	We welcome the Council leading by example as evidenced by the large number of actions concerning the buildings it controls. As per the comment under “Baseline Emissions Inventory”, there are currently no actions targeting emissions reductions for large industrial energy users such as data centres. Actions should be added, such as engaging with the SEAI and large industrial users to discuss e.g., renewable energy or other solutions, attaching emissions-related conditions to planning permission applications etc.	At both national and regional level, policy and objectives set out in both the NPF and RSES promote and support communications networks and digital infrastructure at appropriate locations. Having regard to the foregoing, the Fingal Development Plan 2023 – 2029 seeks to provide a level of control on data centres proposals and importantly locational controls to ensure that such a use is located within appropriate locations which do not compromise labour intensive opportunities on zoned lands, adjacent to high quality public transport corridors or within existing built-up compact growth areas. In recognising that data centres and other industries have particular needs which, if left uncontrolled, could have undue negative environmental impacts, objectives EEO4 and DMSO92 of the Development Plan contain strong criteria which must be addressed by space extensive developments such as Data Centres through the Development Management process. As such, the provisions of the Plan are sufficiently robust to guide and inform any future proposals for Data Centres within the County. The CRU published on 23 November 2021 the “CRU Direction to the System Operators related to Data Centre grid connection processing”. This decision allows the data centre industry to continue to connect to the electricity grid, subject to certain conditions.
FIN-C629-23	The Plan notes that over 13 percent of GHG emissions by the commercial sector in Fingal is accounted for by data centres. It further notes that data centres and other large industrial sites should meet their energy requirements through on site renewables and renewable power purchase agreements. It is unclear from the plan whether Fingal will make this a condition in any new planning	The CRU published on 23 November 2021 the “CRU Direction to the System Operators related to Data Centre grid connection processing”. This decision allows the data centre industry to continue to connect to the electricity grid, subject to certain conditions. As there is continued support for Data Centres within Government policy documents, an outright ban on their development, runs contrary to government policy at this time. In recognising that data centres and other industries have particular needs which, if left uncontrolled, could have undue negative environmental

	permission that is given for such facilities. We would be grateful if that could also be clarified in the Plan.	impacts, objectives EEO4 and DMSO92 of the Fingal Development Plan contain strong criteria which must be addressed by space extensive developments such as Data Centres through the Development Management process. As such, the provisions of the Development Plan are sufficiently robust to guide and inform any future proposals for Data Centres within the County.
FIN-C629-50	We call on the Council to adopt a moratorium of data centres until a cap can be set based on climate targets and they can run entirely on renewables. No new fossil fuel infrastructure should be built for data centres.	
FIN-C629-51	The role of data centres under 'Emissions Reduction Pathways for Fingal County Area' needs further consideration. Fingal County Council should not approve planning permission for more data centres given their link to GHG emissions and heavy energy use. Noteworthy analysis December 2022: As the State tightens up on grid connections, more data centres are looking to switch to gas, with Gas Networks Ireland estimating that connected data centres account for 6% of projected gas demand in 2030.	
FIN-C629-51	We call on the Council to adopt a moratorium of data centres until a cap can be set based on climate targets and they can run entirely on renewables. No new fossil fuel infrastructure should be built for data centres.	
FIN-C629-60	It is well known that Data Centres consume large amounts of energy, and no further data centre planning permission should be given. For a large majority of our clean energy generated to go to a data centres is counterproductive to the Climate Goal.	

FIN-C629-47	<ul style="list-style-type: none"> • The Climate Action Plan should add as an action the setting of an overall cap on the level of data centre energy demand that can be accommodated by the electricity grid in the county. • The Climate Action Plan should specify that new and existing data centres are required to provide flexibility to the grid at times of day and times of year when wind and solar energy on the grid is low relative to demand - and not allowing data centres to use fossil fuel generation as the means of providing this flexibility (they can use other means e.g. energy storage, time-shifting of data processing services). • The Climate Action Plan should specify that new data centres are required to be powered entirely by one of the following, and existing centres should be required to transition rapidly to: <ul style="list-style-type: none"> ○ On site direct renewable power source generation combined with energy storage, or ○ Off site renewable power source and energy storage with dedicated grid connection (avoiding Renewable Energy Certificates). ○ Any renewable energy infrastructure must comply with best practice public participation. • New data centres should have infrastructure in place to enable heat generated from them to be utilised for district heating systems. 	
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CE Recommendation: No change to draft plan.

Energy and Buildings		
Awareness Raising and Education		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-52	We would advocate that Energy awareness initiatives aimed at the individuals and communities should be included in this section.	Fingal County Council notes the importance of promoting energy awareness with individuals and communities. This work is accounted for in the Community Engagement theme including under action C9 'Provide an annual energy awareness event in partnership with Codema, SEAI and other stakeholders', action C10: Promote and support SEAI's Better Energy Communities and Sustainable Energy Communities'. The Council actively works in partnership with Codema and SEAI to identify further opportunities to support communities in reducing energy use.
FIN-C629-57	The IGBC welcomes the actions listed under this section - in particular E18 and would like to encourage the council to share key learnings with the industry. In addition to the use of the "Build Upon Energy Renovation Framework" to capture better data on the impact of energy renovation works and engage with local communities (see comments on the Energy Management/ Reporting to SEAI section), the IGBC suggests the council use the "energy efficiency training clause" as part of the tendering programme to improve quality assurance, and incentivise upskilling (hence contributing to building capacity within the industry)... The inclusion of recommendation E20 is positive as fully aligned with climate targets and local authorities' objective of leading by example.	Fingal County Council will consider applying relevant indicators from Build Upon ² Energy Renovation Framework to this or a similar project along with our previous comment on piloting the process. Fingal County Council assess design team energy efficiency training in evaluations as part of our Green Public Procurement processes. Fingal County Council are reviewing means of including energy efficiency training clauses in contractor tender evaluations and welcome the assistance provided by the IGBC on this and POE.

FIN-C629-70	<p>The Diagrams in this Draft Plan in this section are very helpful-suggest they are displayed in key public realms so language describing expected positive progress for individuals & communities become familiar to the ordinary citizen.</p>	<p>Fingal County Council notes this comment. Action C5 'Develop a library of climate material including webinars, books, articles and digital training resources covering climate science, climate action, just transition, the LACAP, National and Local Climate Action Plans and make available to the public through Fingal's social media channels and Fingal libraries'. This action will provide the public with practical resources that will enhance climate literacy and assist in better understanding the progress the Council is making in relation to climate action.</p>
FIN-C629-72	<p>We believe that in order to encourage and promote retrofitting of homes, Fingal County Council must host one stop shop information drop in days in the main villages for residents to learn more about retrofit options for their homes.</p> <p>Hosting information sessions on retrofitting homes is crucial for several reasons. First and foremost, retrofitting plays a vital role in promoting sustainability and reducing our environmental footprint. By educating people on how to make their homes more energy-efficient, we empower them to take tangible steps towards combating climate change and reducing energy consumption. Additionally, these sessions provide homeowners with the knowledge and resources to improve the comfort and safety of their homes, potentially saving them money on energy bills and enhancing their overall quality of life. These information sessions serve as a valuable platform for individuals to learn about the latest technologies, financial incentives, and best practices for retrofitting, ultimately helping communities transition to a more sustainable and resilient future.</p>	<p>The Council has committed to action C9 in the draft Plan: <i>Provide an annual energy awareness event in partnership with Codema, SEAI and other stakeholders</i>. In addition, the Council has committed to supporting SEC's in action C10: <i>Promote and support SEAI's Better Energy Communities and Sustainable Energy Communities</i>. It is anticipated that SEC's will help drive the uptake in retrofitting nationally.</p>
		<p>CE Recommendation: No change to the draft Plan.</p>

Energy and Buildings		
Council Energy Efficiencies		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-23	We welcome the Plan's goal to reduce Fingal County Council's GHG emissions from 8,683,676 Kg CO2 per annum to just under 4,000,000 KgCO2 per annum by 2030. We note, however, that most of this planned reduction (just over 4,000,000 kgCO2 per annum) would appear to arise from and be dependent on, a transition by the national grid away from carbon intensive fuel sources to more renewable sources of energy. Although we note that Ireland's Climate Action Plan (2021-2030) has set a target for electricity generation from renewables at 70%, the proposed reduction in CO2 emission in the Plan is almost entirely outside of Fingal's control and is dependent on this target being met nationally. It is unclear to us from the Plan what concrete objectives and plans Fingal has to source its energy directly from direct investments in renewable energy sources. Perhaps further consideration could be given in the Plan to this critical issue.	The electricity mix in Ireland contributes significantly to the emissions that Fingal County Council and all energy users are responsible for. While the anticipated reduction of fossil fuels in the National grid energy mix is out of the Council's immediate influence, the Council will nonetheless drive for the national targets to become local achievements through energy upgrades and engagement with public bodies and through the use, support and promotion of renewable energies. Fingal County Council will continue to work to reduce energy demand within its own buildings, and through energy retrofits of the social housing stock, electrification of the Council's fleet and work within the community to influence and be leaders in the energy transition.
FIN-C629-54	Action E5: We would encourage the commitment to an energy performance contract for Balbriggan Town Hall and Library.	Fingal County Council is currently engaged with energy partners such as Codema in the project scoping for a complete mechanical and electrical energy performance upgrade of the Balbriggan Town Hall and Library. The project aims to complete a full low-energy lighting upgrade, a new BMS system, and a heat pump installation. Further technologies, including fabric upgrades, Solar PV and other energy performance upgrades, are currently

		under review and may also be completed in addition to the planned mechanical and electrical works.
		CE Recommendation: No change to draft plan.

Energy and Buildings		
Action Suggestions		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-64	Suggested Example Action: A plan that builds better, to Zero Emission Building (ZEB) standard in all new construction and supports retro-fitting of all other building stock.	Fingal County Council notes this comment made by the HSE in relation to Zero Emission Buildings (ZEB). As stated in the Energy and Buildings chapter in the draft Fingal County Council Climate Action Plan 'All new social houses are developed to Near Zero Energy Building Standard'. This work is reflected within the actions included in the Energy and Buildings theme.
FIN-C629-64	Suggested Example Action: A plan that delivers healthier housing, healthier workplaces and healthier communities through effective urban planning, design, and construction. In other words, Healthy Place making.	This draft Climate Action Plan includes several climate actions which support healthier living and placemaking as mentioned in the HSE Environmental Health submission. The draft Plan is balanced and highlights co-benefits to these climate actions.
FIN-C629-64	Suggested Example Action: A plan that facilitates the large-scale deployment of renewable energy technologies to help deliver Ireland's emission reduction targets. This should include the utilisation of public buildings for the generation of solar power.	Fingal County Council notes this comment from the HSE. The FCC County Development Plan facilitates the large-scale deployment of renewable energy technologies. The Council has committed to identify opportunities to develop renewable energy projects. This work is accounted for in the draft plan under action E26 'Assess potential for viable renewable energy projects on a temporary/permanent basis on council-controlled lands'.
FIN-C629-57	The Council may also want to look at the recommendations of the Healthy Homes Ireland	Fingal County Council are reviewing the recommendations provided to inform the Post Occupancy Evaluation strategies.

	initiative which looks at improving IAQ post-renovation and includes a full section on social housing.	
		CE Recommendation: No change to draft plan.

Energy and Buildings		
Supports Schemes		
Submission Reference Number	Submission Summary	CE Response
Small Medium Enterprises		
FIN-C629-52	<p>Under Energy Efficiency Improvements & Upgrades E 30/31 “Work with SMEs in partnership with SEAI to promote energy efficient adaptations” “Work with SMEs to promote energy efficient adaptations through the energy efficiency grant from LEO”</p> <p>Measured through # of SMEs availing of funding from SEAI. How does this inform of the impact of carbon reductions? It does not inform what proportion are availing of these grants. How does Fingal intend on assisting SME's in identifying and implementing energy upgrades through the various structures.</p>	<p>These are actions where the Council intends to facilitate and assist through the Local Enterprise Office. The Council will engage with small to medium sized businesses to reduce their carbon footprint and enhance their sustainability. This will be achieved through rolling out sustainability initiatives including Green for Business and the Energy Efficiency Grant scheme.</p>
Community Sector and Non-Profits		
FIN-C629-72	<p>Fingal County Council must develop a comprehensive support scheme for not for profits, the community sector, and sports clubs in the County to effectively manage their energy usage and carry out retrofitting projects.</p>	<p>The draft CAP includes Actions C1: Promote & Administer Community Climate Action grants for 2023 – 2026 – to approve grants to communities to deliver climate action projects across the thematic areas as per grant guidelines. It is anticipated that this scheme will support not for profits, the</p>

<p>These entities often operate with limited financial resources, and yet they play a crucial role in community development. Therefore, we must help educate them and provide them with the necessary tools for making sustainable energy choices.</p> <p>A key focus of this support scheme should be educating these organisations about available grants and benefits specifically geared towards energy efficiency projects.</p> <p>FCC must allocate a budget to provide small grants dedicated to energy assessments - a practical step to facilitate energy-saving efforts. These assessments serve as a starting point for identifying areas where energy efficiency improvements can be made. Offering financial assistance for these assessments helps not for profits and community organisations in Fingal to pinpoint the most effective retrofitting opportunities, leading to long-term energy and cost savings. This benefits not only the organisations themselves but also contributes to broader energy conservation and environmental sustainability goals in the County as a whole.</p> <p>In addition, the support scheme should encourage a spirit of community and collaboration. Encouraging non-profits, community organisations, and sports clubs in Fingal to exchange experiences and best practices in energy management and retrofitting can create a support network that allows them to learn from each other and streamline efforts. By fostering partnerships and resource sharing, these</p>	<p>community sector, and sports clubs to carry out retrofitting projects. A significant promotional campaign is underway.</p> <p>In relation to the provision of a budget for small grants dedicated to energy assessments the Council would consider this to be within the remit of the SEAI and national government.</p> <p>The draft plan also includes action C10: Promote and support SEAI's Better Energy Communities and Sustainable Energy Communities (SEC). The SEC Scheme is built around encouraging a spirit of community and collaboration. Codema is the regional co-ordinator for the SEC network in the Dublin / Mid-East Region. This region is made up of almost 200 Sustainable Energy Communities in Dublin City, Dún Laoghaire-Rathdown, Fingal, South Dublin, Wicklow, Kildare and Meath, and in Fingal there are over 20 SECs</p> <p>The Sustainable Energy Authority of Ireland is the national co-ordinator for the SEC programme, which currently consists of over 800 communities around Ireland who are interested in community energy. Each SEC in the Dublin / Mid-East Region is provided with a coordinated mentor to guide them through the 3-step process of 'Learn-Plan-Do'. This planned approach will help the SECs to be energy-efficient, use renewable energy and consider smart energy solutions. The SEC initiative is a funding and support programme, which helps communities to work together to become energy-smart and more sustainable. In doing so, Sustainable Energy Communities aim to use less energy by improving efficiency within the community (e.g., upgrading insulation, improved lighting, and heating systems), incorporating renewable energy (e.g., by installing solar panels, generating community energy) and adopting smart energy technologies, such as smart controls.</p>
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	organisations can collectively make a more significant impact on energy efficiency and sustainability, strengthening their role in community development and promoting a greener future for Fingal.	
		CE Recommendation: No change to the draft Plan

Energy and Buildings		
Miscellaneous Energy and Buildings		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-52	<p>Under Energy Planning & Renewables E24 Continue to develop a strategic approach to town centre regeneration through Town Centre First: A Policy Approach for Irish Towns and by utilising existing buildings and unused lands for new development, promote residential occupancy in our rural towns and villages and provide for a mix of uses within these areas.</p> <p>We welcome this initiative in particular in relation to Main Street Rush and its proposed developments. We would encourage that Fingal County Council prioritises an imminent completion of this as a regenerated Main Street will positively contribute to many other actions outlined within this plan...</p>	Support for this action and request to focus on Rush is noted. The draft CAP and action E24 is a strategic plan and action for the whole County. The Council is working through the Fingal County Development Plan 2023-2029 on the regeneration of Rush and other main streets across the County.
FIN-C629-68	<p>There are plans to refurbish and/or rebuild St. Finian's Community College hopefully in the near future...</p> <p>Could Fingal County Council's Planning Department double down on its sustainable Conditions of</p>	Promoting the use of low embodied energy materials, sustainable building technologies, and reduced resource use in the construction of buildings is an important consideration in the planning and construction of new developments. Objective CIO20 of the Fingal County Development Plan 2023-2029 specifically requires that new schools and other education

	<p>Planning, to ensure that all future school builds are as sustainable as possible. In addition, could green space around the school be prioritised? A school campus that encourages engagement with nature and lends itself to students who walk/cycle/bus to school and electric vehicles rather than the school grounds being dominated by extensive space for car parking.</p>	<p>centres to meet the Council's standards regarding quality of design with an emphasis on contemporary design, landscaping and vehicular movement and vehicular parking. Design of schools and other educational centres should also take account of sustainable building practices, water and energy conservation as well as air quality and climate change. Such standards are to be considered and demonstrated in any application for an educational centre.</p>
		<p>CE Recommendation: No change to draft plan.</p>

4.8 Submissions on Section 5 Transport

Transport		
Active Travel Schemes and Infrastructure		
Submission Reference Number	Submission Summary	CE Response
Pedestrians		
FIN-C629-39	T4 - The installation of zebra crossings transforms the pedestrian's crossing experience. If the Department of Transport approves crossings without flashing lights it will make it cheaper and quicker to roll out more.	A small number of such were subject to trial by the Dept of Transport at different locations across Ireland in 2022-23 which required new temporary legislation. When the trials are completed and we receive guidance from the Dept of Transport and when the necessary permanent legislation is in place, the Council will be considering these as an alternative to lit Pedestrian crossings.
FIN-C629-51	Note the business case for pedestrianisation. Increased footfall translates to increased turnover for local businesses and an improved local economy.	Comment noted and agreed.
FIN-C629-72	We recommend an action to 'Improve pedestrian safety by widening footpaths, building out kerbs at junctions, providing raised continuous footpaths, zebra crossings, etc. '	Fingal County Council Active Travel unit promote active travel through the delivery of high-quality infrastructure and initiatives in accordance with DMURS and industry best practice. This includes the widening of footpaths, building our kerbs at junction, providing raised continuous footpaths, zebra crossings etc. Adequately covered in the draft CAP actions T1, T3, T4, T5
FIN-C629-73	We welcome the fact that Balrothery will be getting an Active travel Plan and we look forward to engaging with the appointed consultants as we have a lot of issues with traffic in our Village, poor pedestrian infrastructure and no cycling infrastructure. In the meantime, can we request that the speed cushions on eth mano war road and darcystown road	Consultants have been appointed to prepare an Active Travel Plan for Balrothery. Balrothery has to-date received significant funding and upgrades to traffic calming which were the subject of public consultation prior to implementation. Fingal County Council will be happy to receive further requests in the context of on-going works programmes and budget availability. It should be noted that traffic calming is subject to the

	are changed to full width ramps to slow down vehicles and help protect pedestrians.	provisions of the Road Traffic Act. Adequately covered in the draft CAP, T1, T2, T3, T4, T5, T6, T7.
FIN-C629-68	<p>Fingal County Council have already put in some excellent cycle lanes in the Swords area. However, they are not ubiquitous, and students would welcome more pedestrianized areas, particularly in towns, like Main Street in Swords for example, with heavy traffic congestion.</p> <p>In addition, could Fingal County Council make sure that 30k slow zones are in operation outside all primary and secondary schools during school hours? Furthermore, if cars are prevented from idling in front of or in close proximity of a school entrance/exit, this would improve air quality and traffic congestion and be safer for students cycling or walking in and out of school.</p>	<p>Fingal County Council has a broad range of projects which have improved and will continue to improve the opportunities for active travel in the county. This programme of projects will ultimately cover the county. Fingal County Council is guided by the Transport Users' Hierarchy which prioritises transports users in terms of their vulnerability and their carbon emissions i.e. pedestrians, those on bicycles, public transport, electric vehicles, non-electric vehicles, aviation. This is in accordance with Government policy and current industry best practice. The Safe Routes to School programme is currently being delivered across the County. It is funded by NTA, administered by An Taisce and delivered by Fingal County Council. This programme comprised front of school's treatments, including removing parking from the schools' gates, reducing speeds limits and improving the active travel access to the schools. This will minimise idling outside school, which will in turn improve air quality. This has been demonstrated by data in a similar project delivered in 2019. This is adequately covered in the draft CAP, Actions T18, T19</p>
Walking and Cycling Routes		
FIN-C629-28	The bike lanes in Balbriggan, Skerries, and between the two are sub-par to non-existent. I think we should give these much higher priority if we want to encourage people to use more sustainable modes of transportation.	A number of Fingal County Council Departments such as Economic Development, P&SI and Active Travel are progressing projects in Balbriggan and Skerries Town to enhance Active Travel measures by providing high-quality infrastructure for walking and cycling. The Fingal Coastal Way will also serve the two towns. Adequately covered in draft Plan actions T1 – T5.
FIN-C629-26	The respondent has asked for a cycle lane to be developed from Eurospar to the train station in Skerries. The respondent has also asked that the coast road from Harrison's cove entrance to junction of new Barnageeragh road be made one way and have a cycle path / walkway down to the town.	The Active Travel Unit is currently progressing an Active Travel Plan for Skerries to identify where improvements to walking and cycling could be implemented to encourage more sustainable modes of travel.

FIN-C629-6	<p>Cycling and Walking routes will significantly reduce climate damage. Providing these will eliminate short unnecessary car journeys taking daily through Swords. A prime example of this is Knocksedan. Built 20 years ago and there is still no link to Swords. The major schemes like The Broadmeadow Greenway needs to be linked to Swords, with local routes linking into it. It can be used for commuting, tourism and leisure.</p>	<p>There is ongoing collaboration between relevant Council Departments such as Active Travel, Planning & Strategic Infrastructure, Operations and Parks to ensure consistent approach to designing Active Travel infrastructure and linking with existing infrastructure, communities and facilities throughout Swords. A significant array of projects is being delivered by Fingal County Council and the aim is ultimately to provide a cohesive cycling network throughout Swords.</p>
FIN-C629-56	<p>daa supports Fingal's key action areas for transport-related emissions. Under the Governments New National Demand Management Strategy, Dublin Airport is considered a 'demand generator' of transport, as passengers must travel to Dublin Airport to access their flights. Dublin Airport would welcome the opportunity to work with Fingal on the following:</p> <p>T1 – daa supports the increase in walkways and would suggest that safe and sustainable routeways should be prioritised to Dublin Airport given its strategic importance within the county and the large number of people accessing the campus and would suggest that this is coupled with native hedgerows to increase biodiversity.</p>	<p>Fingal County Council welcomes the opportunity to work with daa to achieve the objectives set out in the draft CAP, Fingal County Development plan, the Dublin Airport Local Area plan and the Sustainable Swords Strategy, all of which support the provision of improved active travel infrastructure and increased public transport capacity to the Airport.</p>
FIN-C629-56	<p>We support the increase in km of cycle lanes, in particular for cycle lanes towards the airport as this could benefit staff travel to the airport. We are actively working with Fingal on the opportunity on the development of routes between Swords and Dublin Airport. We would welcome development of further cycle connectivity to the connect towards Santry to the south of the airport.</p>	<p>Fingal's Pathfinder Project from Pinnock Hill Roundabout to the south of Dublin Airport will assess linking existing cycle infrastructure south of Dublin Airport to provide greater connectivity between Santry and back to the Airport and Swords. Fingal County Council welcomes the opportunity to work with daa to achieve the objectives set out in the draft CAP, Fingal County Development plan, the Dublin Airport Local Area plan and the Sustainable Swords Strategy, all of which support the provision of improved active travel infrastructure and increased public transport capacity to/from Dublin Airport.</p>

FIN-C629-39	T16 Programmes - I am developing a map of lesser-known safe routes in Dublin 15, using quiet and modal filter-based routes. Expanding this for the entire Fingal area could help those choosing to change to walking or cycling find safe (and sometimes short) routes. https://umap.openstreetmap.fr/en/map/dublin-15-lowno-traffic-quiet-routes_977480	We note the reference to mapping of safe routes. Data prepared in accordance with Government guidance and standards will be used for mapping on Fingal Open data.
Greenways		
FIN-C629-51	Action T2: Greenways are often located in ecologically sensitive areas and an ecological survey should always precede their construction. Greenways should be considered as basic cycling infrastructure rather than as a tourism initiative.	The development and construction of Greenways are guided by Planning and Construction Guidelines & Project Appraisal Guidelines produced by both the National Transport Authority (NTA) or Transport Infrastructure Ireland (TII). The guidelines ensure robust environmental analysis is undertaken in determining the optimum route selection for a particular Greenway. Ecological surveys would proceed the route selection and planning stages and, in some instances, would be required in addition prior to construction.
FIN-C629-54	Action T2: Greenways are often located in ecologically sensitive areas and an ecological survey should always precede their construction. Greenways should be considered as basic cycling infrastructure rather than only a tourism initiative. Existing cycle ways are often left in poor condition and a commitment to regular maintenance and upgrades should be included in this plan.	
FIN-C629-76	The Fingal active travel group welcomes the provision of funding for active travel infrastructure to councils across the country including priority 'Pathfinder projects' under the Programme for Government. We strongly support the need for construction on the following projects needs to commence as soon as possible: 1. The Fingal Pathfinder (R132) Swords Connectivity Project 2. Fingal Coastal Way	Fingal's Pathfinder Project from Pinnock Hill Roundabout to the south of Dublin Airport will assess linking existing cycle infrastructure south of Dublin Airport to provide greater connectivity between Santry and back to the Airport and Swords. This project aims to provide improved active travel infrastructure to/from Dublin Airport. The Following greenways are currently at various stages of development within the planning & Strategic infrastructure department: - Fingal Coastal Way - Sutton to Malahide Cycleway

	<p>3. Sutton to Malahide Cycleway 4. Broadmeadow Way 5. Royal Canal Urban Greenway</p> <p>The four greenways mentioned above were identified in the 2019-2023 Climate Action Plan and whilst we note that consultation/preparatory/planning work has commenced none have started construction.</p> <p>We would strongly encourage the prioritisation of primary route 5 of the Greater Dublin Area Cycle Network , which would directly connect Dublin 15 (a population of 150,000) with Dublin City. CBC05 Blanchardstown BusConnects fails to deliver the vital cycling link from Blanchardstown shopping centre to Castleknock. This direct route should be prioritised rather than the indirect route of “FCC Castleknock to Blanchardstown via Farmleigh.”</p>	<p>- Broadmeadow Way - Royal Canal Urban Greenway</p> <p>It is the intention of the P&SI Department to continue to progress the Greenways above in accordance with the relevant stages of both the Planning and Construction Guidelines & Project Appraisal Guidelines produced by both the National Transport Authority (NTA) or Transport Infrastructure Ireland (TII).</p> <p>The route Castleknock to Blanchardstown via Farmleigh is a primary route on the Greater Dublin Area Cycle Network Plan and will cater for residents of Carpenterstown and Riverwood.</p>
Connectivity		
FIN-C629-15	R132 cycle network	The Active Travel unit is currently managing a number of projects along the R132 Road and around the Swords area that will improve sustainable travel around Swords, Dublin Airport, Lusk and towards the Broadmeadow Estuary.
FIN-C629-72	The references in the draft plan to connectivity/permeability to promote active travel should be clear that this is filtered permeability.	<p>'Filtered permeability' relates to roadways. Filtered permeability is an urban planning concept that “filters out” through car traffic on selected streets to create a more attractive environment for walking and cycling, while maintaining accessibility for local inhabitants, deliveries or emergencies.</p> <p>'Connectivity and Permeability' refers generally to locations where improvements can be made for pedestrians, cyclists, users of mobility aids, wheelchairs and buggies and the likes, that may not currently be available. These barriers may include a boundary wall/fence, hedge line, kissing gates, and the likes, that may not be on road, other examples may include</p>

		but not limited to; tactile paving, dished pavements, new segments of footpath/cycleway links to connect/improve existing infrastructure.
FIN-C629-39	Connectivity and removal of barriers to cycling.	This is adequately covered in the CAP under action T3.
Infrastructure Design and Maintenance		
FIN-C629-72	There should be an action around roads projects being climate-proofed (new and increased capacity). It's possible for the Emissions savings which would result from the positive transport actions in this plan to be wiped out if some of the proposals for extra road capacity for cars are implemented.	Climate targets for the transport sector are set at a national level. The national Climate Action Plan 2023 sets out that the ambitious target for the transport sector to reduce emissions by 50% by 2023 and sets a roadmap of action to deliver same. Any proposed new roads in Fingal will have regard to The TII standard 'Climate Assessment of Proposed National Roads - Standard PE-ENV-01105' and to the measures regarding Climate Action management set out in the GDA strategy 2022-2024. Climate change is also assessed as part of Environmental Impact Assessment (EIA) requirements and is considered as one of the environmental factors to be assessed as part of the Council's planning and development of new roads.
FIN-C629-16	Given the increased likelihood of flooding (section 3 of the plan), actions on infrastructure developments for active travel should be considered in conjunction with actions on flood resilience, as these are interconnected. Actions F12 - F14 on surface water management and action F17 on sustainable drainage systems for new developments are important here. Active travel routes should incorporate "green infrastructure" features, such as trees.	The Active Travel unit engages across all local authority functions in the design and delivery of active travel initiatives and infrastructure. To date numerous examples are in place of new green infrastructure delivery as part of new/improvement cycleway and/or walkways. This is government policy and industry best practice. Further, the development and construction of greenways are guided by Planning and Construction Guidelines & Project Appraisal Guidelines produced by both the National transport Authority (NTA) or Transport Infrastructure Ireland (TII). The guidelines ensure robust environmental analysis is undertaken in determining the optimum route selection for a particular greenway. Flood risk is one of the criteria under which proposed active travel infrastructure is assessed. SUDs features and the delivery of high-quality public realm, including the additional planting or replacement of trees are included in the planning & design of active travel infrastructure and greenways.
FIN-C629-72	Given the increased likelihood of flooding (section 3 of the plan), actions on infrastructure developments for active travel should be considered in conjunction with actions on flood resilience, as these are interconnected. Active travel routes should incorporate "green infrastructure" features, such as trees, see A framework for assessing the quality of	

	green infrastructure in the built environment in the UK - ScienceDirect	
FIN-C629-52	<p>Priority must be given to upgrade roads and paths that connect major arteries of built-up areas and urban centres. (T12) Enhancement / reallocation of roads & street space to promote active travel and improve public space. Implement in all 3 LEAs</p> <p>(T28) Maintenance and upgrade of public footpath network and regional and local roads to encourage modal shift to walking and cycling Km of footpaths and roads maintained that facilitates modal shift</p>	Ongoing maintenance of the existing local and regional roads and footpaths is a priority across the county in all areas. When refurbishment works are being carried out on the existing roads network, provision for cycle lanes and footpaths are made where feasible and where sufficient space is available on land in the ownership of the Council.
FIN-C629-76	<p>Cycling in poor weather conditions such as rain and icy conditions can be hazardous particularly when cycle paths are not clean and ill maintained. The gritting of active travel infrastructure and paths with a salt and gravel mix should be prioritised with the same emphasis on gritting and cleaning roads for private vehicle use. This would also benefit walkers who use shared active travel infrastructure.</p> <p>During Autumn and winter, and in particular after strong winds and storm events leaves can pose a hazard for walkers and cycling as they build up and degrade on paths and bike lanes, creating a slippery surface. These leaves can in turn block drains providing a flood risk for roads.</p>	Extensive sweepers are deployed Countywide for leaf fall. Cycle paths are maintained using specially adapted sweepers. This deals with the leaf fall. In addition, attachment for these sweepers for gritting is available.
FIN-C629-76	As a permanent climate adaptation action, it is important that gullies and drains are maintained and kept clear from debris to allow rainfall to be diverted	Cycle infrastructure is maintained using specially adapted small sweepers. It is not intended to install the smart gully sensors at this time however the council crews are proactive in gully maintenance.

	<p>from roads that are shared by vehicles and active travel users.</p> <p>We note the use of 'smart gulley sensors' by Dublin City Council in conjunction with Smart Dublin. Such sensors should also be used by Fingal to allow the efficient allocation of personnel and plant resources to unblock drains and gullies.</p> <p>The Fingal Active Travel Group and Dublin Cycling campaign welcome the recent publication of the NTAs Cycle Design Manual in September this year. In particular we note section 4.2.3 of the manual; where 'double drainage' is required, a side-entry drainage system on the cycle track is preferred so that the entire track surface is available for cycling and not interrupted by gullies,</p> <p>Proposed CCAP Action: Maintain a cleaning schedule of all active travel infrastructure</p> <p>Proposed CCAP Action: Install Smart Gulley sensors in conjunction with Smart Dublin to communicate blocked drains to operations and drainage crews.</p>	
FIN-C629-76	<p>On a similar note, cold weather conditions can be a hazard to active travel due to frozen surfaces and black ice etc. Fingal CC operations crews undertake regular and effective gritting of road surfaces to keep main traffic routes navigable and safe. The Fingal Active Travel Group would like to see the same emphasis placed on paths and active travel infrastructure.</p> <p>Proposed CCAP Action: Ensure the gritting of all active travel routes during cold weather conditions</p>	<p>The Council currently salts over 40% of the local and regional road network during the winter maintenance season. The salting of footpaths is undertaken in severe weather events only and there are no plans for a change to this. The Council is rolling out salt boxes in estates for use by resident's associations.</p>

FIN-C629-72	<p>Ongoing collaboration between Ops & AT teams to ensure consistency of approach and using opportunities within the Ops programmes to implement Active Travel infrastructure.</p>	<p>This is adequately covered in the draft CAP under actions in the Transport section, as they are shared actions. There is ongoing collaboration between Ops & AT teams to ensure consistency of approach and using opportunities within the Ops programmes to implement active travel infrastructure. For example, a new section of footpath and cycle path has been installed connecting the R108 and the Old Ballymun Road. This was carried out on top of road repairs at the same location. New footpaths and connections have been installed around St Helens SNS through collaboration between Operations and Active Travel units and new cycling infrastructure has been installed on Station Road Portmarnock to connect the train station to the village. There are many other examples, and we will continue to collaborate between departments and actively engage when works programmes are at proposal stage.</p>
FIN-C629-76	<p>The Fingal Active travel group have made previous submissions to the FCC active travel strategy as well as individual active projects. In particular we reiterate the need for a strong focus on the following areas;</p> <ul style="list-style-type: none"> ● Cleaning of current cycling infrastructure (particular during autumn and winter season when there are likely to be leaves and sediment on bike lanes ● Upgrading and resurfacing current cycle lanes as many are degraded in Fingal ● More bicycle counters to collect data and monitor progress ● Bicycle upcycling scheme similar to bike to work scheme but promoted and supported by FCC such as the Rediscovery Centre to help disadvantaged groups and refugees ● Kissing gates. It's should be stated quite clearly that they are to be removed from all regions within FCC including greenways 	<p>This is adequately covered in the CAP. Cleaning of current cycling infrastructure is covered under T28 and legal definition of a public road. Maintenance of this infrastructure is also covered under T28. Data collection is carried out on infrastructure projects pre/post construction. Access constraints, such as kissing gates, are not compliant with current Government policy and a recent Government circular prohibits their use within future development and recommends removal from their current locations to ensure universal access (including for people with disabilities and those pushing prams) and the free flow of cycling. This follows from NGS (National Guidelines and Standards Group) (Infrastructure) Circular 4 of 2022 which was issued to each Local Authority on 26th July 2022 by The Department of Transport. The Fingal County Development Plan 2023-2029 has a chapter on Connectivity and Movement with an objective CM019 - Optimising Accessibility for All where the removal of barriers to active movement, improve connectivity and permeability and optimise accessibility for all users shall be prioritised. The capture of km's of cycle lane constructed is adequately covered in the CAP under action T1 & T2, no changes required. The Pavement Management System (PMS) is used to capture all active travel infrastructure.</p>

	<ul style="list-style-type: none"> • Publication of Kms of cycle lanes completed annually (as per T2 action in plan) 	
FIN-C629-76	Remove all kissing gates in FCC area.	
FIN-C629-52	<p>The delivery of active travel infrastructure should be implemented in a considered manner that has been informed by multi -criteria analyses that consider a range of factors including potential demand, safety, and social benefits to achieve a shift from private car use to sustainable travel. There are a number of key actions outlined in the plan that will need to carefully consider the above in order to maximise the impact of any investment in infrastructure...</p> <p>Additional protected cycle lanes must be delivered in the short term that will address providing connectivity between major arteries and supplement the Coastal Way.</p> <p>This links with the "Safe Routes to School programme". Delivery of this programme should prioritise areas where there is already a strong use of walking and cycling but that is hindered due to the condition of the routes.</p>	<p>Significant and robust decision making goes into the preparation of active travel programmes in Fingal County Council, both from funding bodies and internally. Significant decision making, and public engagement resulted in the Greater Dublin Cycle Network Plan which informs the active travel programme. The Fingal Active Travel section plans and delivers infrastructure which connects and supports existing/proposed strategic greenways to key points of residential, educational, amenity, economic centres. This is adequately covered in the CAP, T3, T4, T5.</p>
FIN-C629-56	T3 - daa understands the importance of promoting active travel and would welcome any opportunities to explore solutions on how to integrate existing infrastructure with active travel schemes.	<p>Fingal County Council welcomes the opportunity to work with daa to achieve the objectives set out in the draft CAP, Fingal County Development plan, the Dublin Airport Local Area plan and the Sustainable Swords strategy, all of which support the provision of improved active travel infrastructure and increased public transport capacity to the Airport.</p>
FIN-C629-76	An area of concern for the Fingal active travel group is the damage being caused to active travel	<p>Street trees are removed strictly in line with the Council's Tree Strategy following assessment by the appropriate professional. It is unfortunately</p>

	<p>infrastructure due to root damage by trees in the immediate vicinity.</p> <p>Section 5.3.1 'Design for Maintenance section' of the new NTA Cycle Manual states; Planting: Sympathetic and appropriate planning should be designed to incorporate slow-growing vegetation where overgrowth can be addressed at frequent intervals that are not excessive. »</p> <p>Trees: The design and construction of a new route should address trees that are likely to cause problems in the future. This could include removal or where appropriate, the installation of root barriers.</p> <p>For biodiversity and climate reasons we would rather not see the removal of mature or semi mature trees in such situations where tree damage is being caused but rather remedial/retrofit measures such as movement joints, the installation of root barriers and flexible resin seals in kerbing areas where necessary. Resurfacing of damaged areas should also be prioritised. Proposed CCAP Action: Identify and repair all damaged active travel infrastructure including root damage, subsidence or general wear.</p>	<p>not always possible to maintain street trees however, their removal will only be considered when all other options have been exhausted. Active travel infrastructure is and will be repaired as appropriate.</p>
FIN-C629-52	<p>Any new developments should consider their linkages to main arteries in the town and should include the provision of adequate and appropriate walking and cycle ways.</p> <p>Eg: Particular to Rush, while the Fingal Coastal way is underdevelopment, the proposed routes do not provide increased / improved connectivity to the train station, to schools and to major clubs like the GAA or Rush Athletic. In particular, with the proposed</p>	<p>The Fingal Coastal Way is primarily a leisure route and is identified in the Greater Dublin Area Cycle Network Plan as such. However, local commuters and school children will benefit from the facility being provided and ultimately a larger network of active travel facilities will be provided to connect educational and sports facilities with public transport links.</p> <p>The emerging preferred route for The Fingal Coastal Way was published in October 2022. It is envisaged that the need for other active travel facilities will be assessed in the area and will be developed to link into the Fingal Coastal Way.</p>

	<p>educational complex under planning that will serve both St Joseph's Secondary School and Gaelscoil Ros Eo adequate and safe path and cycle ways should be prioritised.</p>	<p>Fingal County Council is actively working on a project to improve accessibility to Rogerstown Park, which involves the provision of a new route connecting Lusk and Rush Train Station and the Park. The Coastal Way will also directly serve the park and so there will ultimately be a high-quality linkage from the Fingal Coastal Way to Lusk.</p>
FIN-C629-57	<p>The IGBC support the Avoid-Shift-Improve approach taken by Fingal CoCo and welcome actions listed under this section (in particular T1, T2, T3, T4, T11, T12, T20 and T22).</p> <p>Density has a key role to play in facilitating a more effective use of both existing and any new transport infrastructure and would contribute to a reduction in transport emissions....</p> <p>The IGBC, is currently involved in a project called Viable Homes which aims at developing practical guidance for planners and developers for carbon optimisation of constructions and developments. This will be available by the end of 2023. As part of this process, we will also create a handbook of low-rise typologies that optimise density, cost, adaptability, operational and embodied carbon... A next step in the project will be to look at the transport emissions associated with various types of developments. The IGBC would be delighted to share the findings of these study with Fingal CoCo.</p>	<p>The Council will welcome the opportunity to avail of the report findings.</p>
FIN-C629-57	<p>In relation to T29, we encourage the Council to look at PAS2080 as it looks at the whole life carbon impact of infrastructure (including impact on transport). See: https://www.bsigroup.com/en-GB/our-</p>	<p>The Council will consider the PAS2080 through the implementation of the action.</p>

	services/product-certification/product-certification-schemes/pas-2080-carbon-management-in-infrastructure-verification/	
Bike Sharing, Parking and Storage		
FIN-C629-16	One barrier to using bikes to get to the train station is the real danger of theft; individual bike boxes are too small for any non-standard bike and expensive to the user. An action could be added to introduce multi-bike parking facilities like the ones in use in Australia About Parkiteer - Parkiteer.	Noted. Bicycle Parking at train stations is managed by Irish Rail as a subsidiary of Córas Iompair Éireann (CIE). On public land Active Travel will continue to expand different types of bicycle parking equipment throughout Fingal and at various transport hubs to meet demand. This is adequately dealt with in the CAP, actions T6, T7, T8, T10
FIN-C629-72	An obstacle frequently encountered when using bicycles for commuting to train stations is the persistent risk of theft. Individual bike storage lockers are often inadequate for accommodating non-standard bicycles, and they can pose a financial burden for users. Therefore, it is prudent to consider implementing multi-bike parking facilities as a viable solution to enhance bike commuting safety and convenience.	
FIN-C629-39	T16 - It might be possible to reduce the carbon footprint of Council supported events with supervised bike parking. The San Francisco Bike Coalition provides Valet Bike Parking at events. San Francisco city regulations requires monitored bike parking for large events. https://sfbike.org/resources/bike-parking/valet-bicycle-parking/	All mass gathering events provide secure additional bike parking with the aim of providing ample bike racks in towns and villages where events take place.
FIN-C629-54	Action T8: Bike sharing schemes are great additions but education and management to ensure better care of bikes is needed.	Fingal County Council's Active Travel Section are committed to providing quality and impactful bike share schemes across the County. We will continue to work with our providers on adequate parking facilities, fleet management logistics and quality of service while working with our

		community stakeholders to ensure there is guidance and education around the need for safe use and proper parking.
FIN-C629-56	T6 - daa has existing bicycle parking facilities available; however, we would welcome the opportunity to support the increase of bicycle parking to support the future increase of active travel usage in the county. In the near future, Dublin Airport will implement shared onsite cycle lockers and increased number of stands.	Fingal County Council will continue to engage and support all stakeholders in relation to the expansion of quality bike parking facilities across the county. This is managed by the Active Travel Unit who consult, assess, and implement the bike parking infrastructure through mainly a small works contract. Bike parking is further expanded through a number of other Active Travel schemes such as Safe Routes to School projects, Protected Cycle Lane projects and callouts to schools' clubs and community groups.
FIN-C629-56	T8 - daa would welcome the opportunity to work further with Fingal County Council on their forthcoming bike sharing scheme.	Fingal County Council are committed to providing Bike Share Schemes around the County. This will involve working with key stakeholders to ensure that the service is impactful and beneficial for the residents and businesses around Fingal. This will include semi state bodies like the daa and other public transport operators.
FIN-C629-72	As well as public bike parking, we should have an action around providing supports for bike parking in residential developments under certain conditions.	Noted. As part of our continued rollout of bike share schemes in the County, the Active Travel Unit is working in conjunction with the bike share providers to identify potential bike parking locations in residential areas that will help with the utilisation of the schemes. These suburban hubs have been trialled in various locations across Dublin and have proved successful.
FIN-C629-76	Fingal Active travel group members have noticed numerous examples of bikes from shared bike schemes being left randomly on footpaths, locked to trees, lamp posts, gates etc. Whilst such parking is poor (or ill informed) behaviour by people using the service rather than the provider, the proliferation of bikes in inappropriate locations where they may block paths etc. is not acceptable to the wider public. Proposed CCAP Action: Ensure shared bike operators manage the storage and parking of bikes in designated areas to prevent the blocking of paths and public areas.	Fingal County Council provide bike sharing schemes under pilot contracts. Issues such as parking and storage are dealt with on an ongoing basis in accordance with our contract. This learning process will inform a more long-term contract which will be put in place shortly. Adequately covered in draft CAP, T8, T9, T10

Travelling to School		
FIN-C629-7	Improving public transport and parking restrictions near schools	The Active Travel unit is working with schools where new infrastructure is planned or has recently been constructed to encourage greater number of parents and school children to use more sustainable modes when travelling to school. The Active Travel team include Walking and Cycling Officers who engage with schools and support them when introducing new initiatives to encourage more active travel trips.
FIN-C629-54	Action T18: The introduction of a “no car idling” policy at schools should be included to help improve air quality there.	The Safe Routes to School programme comprises front of school’s treatments, including removing parking from the schools’ gates, reducing speeds limits and improving the active travel access to the schools. This will minimise idling outside school, which will in turn improve air quality. This has been demonstrated by data in a similar project delivered in 2019.
FIN-C629-72	We recommend that the plan includes a list of the current Safe School projects. Similarly, it should have a list of all current active travel projects. There should be a target for all schools to be made accessible and safe for children walking to school. One of the actions should be a communications exercise highlighting the new safe routes to school, the new segregated cycles ways etc, with maps.	<p>Regarding the Safe Routes to School programme, the Active Travel unit is currently delivering interventions at 14 schools through Round 1 and 2 of An Taisce/NTA’s programme. The Active Travel unit is engaging with Fingal schools to provide information on active travel, to help set up walking/cycling buses, and to encourage schools to participate in the Fresh Air Friday initiative. There is a particular focus on this following delivery of Safe Routes to School projects. The capture of the number of protected cycle lane schemes completed and km’s of cycle lane constructed is covered in the CAP under action T1 & T2. The Pavement Management System (PMS) is used to capture all active travel infrastructure. The Active Travel unit prepares a works programme each year in conjunction with our funding bodies, which is presented to the elected representatives.</p> <p>As with all cycling and walking infrastructure projects, individual communications plans are prepared and executed for each school. These plans include communications to local residents and to the school community before delivery, during delivery and following completion. Information on the Safe Routes to School programme on the Fingal County</p>

		Council website can be expanded so that those not currently involved in a school project can learn more about it and maps can be prepared to highlight Safe Routes to School locations, and other schools given similar treatments, around the county.
Comfort and Safety		
FIN-C629-32	Cycling and Walking routes will significantly reduce climate damage. Many of our parks and open spaces are no go areas for residents of Fingal once it gets dark. I would welcome more lighting in our public realm to encourage walking and cycling, rather than car use, as public transport is not an option in many areas in Fingal at the moment.	Public lighting within parks and natural habitats will be assessed on a case-by-case basis. Provision of lighting to link routes to public transport are a priority for installation in a number of locations across the County.
E Scooters		
FIN-C629-56	T9 – We support the provision of E-scooters and would like to work with Fingal to understand whether there is an opportunity to implement this at the airport.	The Road Traffic and Roads Act 2023 caters for the legislation around a new vehicle category, PPTs, which includes eScooters. That act is currently going through the TRIS process and once it has been enacted Fingal County Council will consider the options in this regard across the County. Adequately covered in the draft CAP, Action T9.
FIN-C629-3	The action plan mentions E-scooters a number of times. One aspect that is missing is E-scooter training. Speak to any A&E nurse and they will tell you that E-scooter-related accidents are getting out of hand. End users must be trained to safely use the public road network and avoid conflict with other road users.... Roadcraft education is needed if the action plan wants to ensure public safety. It should be mandatory! And so too should helmets, which are not mentioned once in the action plan!	The Road Traffic and Roads Act 2023 caters for the legislation around a new vehicle category, PPTs, which includes eScooters. That act is currently going through the TRIS process and once it has been enacted Fingal County Council will consider the options in this regard across the County. Adequately covered in the draft CAP, Action T9.

Fingal County Council Events		
FIN-C629-76	<p>We congratulate Fingal on the events and concerts being held at Fingal venues such as Malahide castle. However, we feel that there is more that can be done to promote active travel to and from these events to reduce traffic congestion and resulting air pollution and emissions at these events.</p> <p>Proposed CCAP Action: Prioritise active travel including convenient bike parking at all Fingal Events.</p>	<p>The events section has provided free and low-cost bus transfers to events and promoted and encouraged active travel to events including the provision of ample bike parking and aims to build on this year on year.</p>
		CE Recommendation: No change to draft plan.

Transport		
Public Transport Services		
Submission Reference Number	Submission Summary	CE Response
Comfort, Safety and Availability		
FIN-C629-3	<p>Increased use of public transport is a viable solution, but missing from the list of proposals is a safer and cleaner network...</p> <p>While our transport network is generally modern and clean, mobile data and Wi-Fi signals tend to be poor. Investment is needed here.</p> <p>And equally as important, those commuting to and</p>	<p>The Council welcomes this submissions and points made. The Council will continue to work with the relevant transportation bodies, including the National Transport Authority, Transport Infrastructure Ireland and others, to facilitate and support the delivery of improvements to the public transport network, to achieve a modal shift across the County. The draft CAP lists current projects such as MetroLink serving Dublin Airport, Dart Expansion, and Bus Connects; and the Councils support for these projects through action T20.</p>

	<p>from work would be more incentivised if public transport accommodated their work. For example, adding seats with fold-out tables and power sockets to charge devices. quiet carriages.</p> <p>Our trains and buses are overcrowded. Peak capacity needs to be massively increased,</p> <p>Scheduling reliability needs to be improved... unreliable service, causes the majority of commuters to rely on their cars instead because traffic congestion is far more predictable.</p> <p>Most important: Don't force people into walking, cycling, or public transport until viable and useable solutions are in place. Likewise with emission-free zones. Don't restrict access until viable transportation options are in place for the majority of commuters. Not everyone can afford EV's.</p>	<p>The provision of bus and rail services, and their comfort, capacity, frequency, and scheduling is beyond the scope of the local authority Draft Climate Action Plan and are primarily issues for bodies such as the National Transport Authority, Dublin Bus, Irish Rail and others. However, the Council will continue to advocate for improvements in public transport service levels through its continued support for the Transport Strategy for the Greater Dublin Area 2022-2042.</p>
FIN-C629-23	<p>Ireland is the second most car dependent country in Europe. As the Plan points out transport is the biggest contributor to GHG emissions in Fingal accounting for a total of 45% of all emissions. The 2022 census revealed that in Fingal approximately 50% of journeys to work, school or college were made either as a car driver or as a passenger in a car. We note Fingal's emphasis in the Plan on a conversion to active travel in order to address this problem. We particularly welcome the recent commencement of the work on the Broadmeadow Greenway that will connect our communities with those in Malahide... Active travel is not the solution for the many people in our</p>	

	<p>communities who have to journey into the City Centre or along the M50 corridor in order to attend their workplaces. Their choices reduce to public transport or a car journey. Unfortunately, too often the experience of commuters with public transport in our communities (where it is even available) is that it is not reliable, not clean and furthermore does not always feel safe. Pope Francis notes in Laudato Si' that "Many specialists agree on the need to give priority to public transportation.". Whilst we appreciate that Fingal is not responsible for public transport, we encourage Fingal to continue to emphasise the importance of advocating for and facilitating key strategic public transport initiatives as well as advocating for the improvement of the existing public transport experience for our commuters who all deserve better.</p>	
FIN-C629-55	<p>Infrastructure and Transport: we would like to emphasise the urgent need for improved public transport options within Fingal as a fundamental component of the Climate Action Plan. The further development of sustainable transport infrastructure, cycling paths, and public transportation option should be a priority...</p>	
FIN-C629-70	<p>We look forward to receiving reports back on our community on The Howth Peninsula which is experiencing many challenges due to overdevelopment in density & number of residences & the threat to our local direct Dart Service. We need serious support from Fingal in the latter 2 issues.</p>	

FIN-C629-16	The emphasis should be on reducing traffic first (by improving active and public transport), then on moving towards low-carbon / no-carbon transport.	The Council strongly promotes the transport users' hierarchy, which is Government policy. This hierarchy puts the most vulnerable users and those that produce the least carbon at the top of the priority list when designing and implementing infrastructure i.e., pedestrians, those on bicycles, public transport, electric motor cars, non-electric motor cars, aviation etc. This prioritisation is covered in the CAP, Action T1-T28
FIN-C629-72	The primary emphasis should lie in the initial reduction of traffic, mainly achieved through the enhancement of active and public transportation options, followed by the gradual transition towards low-carbon or zero-carbon transportation alternatives.	Agreed
Train Services		
FIN-C629-60	It is widely known that many people drive from Drogheda to get the train from Balbriggan as it is much cheaper. This is unacceptable, and Fingal must engage and influence the RTA to change the leap card zone to Drogheda. The air pollution in Balbriggan is bad enough according to an air quality test in 2016.	Though the Council is not responsible for the ticketing or rail travel, the Council will engage with Irish rail in relation to extending the leap card zone in the implementation of Action T20: Support the development and expansion of existing public transport services including MetroLink, BusConnects and DART expansion to Balbriggan.
FIN-C629-54	Action T20 (and DZ Balbriggan): Encourage Irish Rail to extend Short Hop zone to Gormanston or further north. Would reduce some traffic to Balbriggan train station and relieve parking space.	The Council will engage with Irish rail in relation to this suggestion in the implementation of Action T20: Support the development and expansion of existing public transport services including MetroLink, BusConnects and DART expansion to Balbriggan.
Bus Services		
FIN-C629-17	There is no decent bus service in Skerries, especially for those of us in Barnageeragh Cove, Kelly's Bay and Hamilton Hill. Due to time constraints, weather and early/late starts in work, the tedious 20 mins walk to the train station is not always possible and there is no other option in case of emergency. I was stunned to	The provision of high-quality public transport land transport links lies within the remit of the National Transport authority (NTA). Notwithstanding this, it is the objective of the Council to facilitate and support the provision of high-quality public transport in Fingal County Council and to that end, to work collaboratively with the NTA, Irish Rail and TII to achieve this objective. It is the vision of the Council, as set out in the CDP to provide an

	<p>see a bus station but no bus option off the train and a random 33 that doesn't even service the full town. I've had to walk that road at all hours alone as a vulnerable woman as impossible to get public transport... In addition, I think a link or feeder bus that loops Skerries, Balbriggan, Lusk/Rush would be a much-needed addition....</p>	<p>integrated approach to align housing with public transport provision. This is adequately covered in the draft CAP action T20. Further - the Active Travel unit is currently preparing an Active Travel Plan for Skerries with the objective of enhancing the active travel offerings in this town and encouraging a modal shift.</p>
<p>FIN-C629-20</p>	<p>In order to get people out of cars and onto public transport in Skerries, we urgently require a much better bus service, especially to and from the train station. This must include the newer housing estates of Kelly's Bay, Barnageeragh Cove and Hamilton Hill...</p> <p>When will the new route proposed by TFI be operational? Any new route must include the Barnageeragh Road.</p> <p>On the Barnageeragh Road the bicycle lane ends abruptly, requiring cyclists to either dismount, for safety reasons, or join motorists on the road. For this reason, few cyclists use the already existing bicycle lane. A bicycle lane the full length of Barnageeragh Road is required.</p>	
<p>FIN-C629-21</p>	<p>The situation regarding the buses in Skerries is ludicrous. The bus depot is at the train station but there is no bus stop there. The buses leave and arrive at the station empty... As a result of having no bus service, more than sixty cars drive up and down the Barnageeragh Road morning and evening and park all along the road and in the train station in order to get the train...</p>	

FIN-C629-24	There is no connectivity between buses & trains.	
FIN-C629-26	<p>1. It's bonkers that the buses don't pick up at train station (Skerries)</p> <p>2. A bus needs to come straight up the Barnageeragh road and serve Kelly's Bay Barnageeragh cove and Hamilton hill.</p>	
FIN-C629-27	<p>Skerries has a good train service but inadequate parking at the station. As a result, there are cars parked along the access roads. A local bus service is required to provide transport to the station.</p> <p>The new estates like Hamilton Hill, Barnageeragh Cove and Kelly's Bay have no bus service at all. This is inexplicable in an era where we are all encouraged to take public transport.</p>	
FIN-C629-28	There should be a more frequent and reliable connection between Skerries and Balbriggan. The 33 stops very far from the train station, for example, or it does not go far enough into the town (I think it should go all the way to Bremore Castle, if not further).	
FIN-C629-31	Can anything be done about the chaos at Skerries Train Station? There are dozens of cars dropping and picking up train passengers. Alongside this there are either 1,2 or 3 buses which are neither picking up nor dropping passengers - as this is not an official bus stop.	

	On wet evenings the situation is actually dangerous for pedestrians alighting from the trains.	
FIN-C629-25	<p>I have a disability and cannot currently access my gp surgery in Skerries Main Street, my local library or train station, without using my car. The nearest bus stops to my home in Barnageeragh Cove are not accessible to me as I can only walk limited distances. The nearest bus stop is on the Balbriggan Road, via an extremely narrow, poorly maintained path, totally unsuitable for anyone dependent on mobility aids, or indeed anyone wheeling a pram. The bus stop on one side -the route towards Balbriggan- requires passengers to disembark at a junction of two roads, with no footpath. Crossing to the narrow footpath opposite is hazardous, especially for people who cannot cross the road quickly. Traffic to and from Balbriggan is constant, and traffic from Ardgillan direction comes from under a bridge and around a bend, making it difficult to see, while simultaneously looking for a break in traffic on the Balbriggan/ Skerries road. In spite of being a car owner I was a regular public transport user when I lived in various other locations. Public transport in this area is so inadequate it does not enable, let alone incentivise, people to curtail their use of cars.</p>	<p>The provision of high-quality Public Transport land transport links lies within the remit of the National Transport Authority (NTA). Notwithstanding this, it is the objective of the Council to facilitate and support the provision of high-quality public transport in Fingal County Council and to that end, to work collaboratively with the NTA, Irish Rail and TII to achieve this objective. It is the vision of the Council, as set out in the CDP to provide an integrated approach to align housing with public transport provision. This is adequately covered in the draft CAP action T20. Further - the Active Travel unit is currently preparing an Active Travel Plan for Skerries with the objective of enhancing the active travel offerings in this town and encouraging a modal shift. The needs of people with disabilities are a cornerstone on the active travel programme delivery, the focus of which is to encourage modal shift in accordance with the transport users' hierarchy. We do this predominantly by reallocating existing road space for more vulnerable users. In addition, all maintenance works on existing infrastructure takes cognisance of government policy in this regard.</p>
FIN-C629-48	Upgrade of our public transport system with a direct bus route to Lusk train station & a direct bus route to Dublin City centre, in addition to include improving school bus options.	<p>The provision of high-quality public transport land transport links lies within the remit of the National Transport Authority (NTA). Notwithstanding this, it is the objective of the Council to facilitate and support the provision of high-quality public transport in Fingal County Council and to that end, to work collaboratively with the NTA, Irish Rail and TII to achieve this objective. It is the vision of the Council, as set out in the</p>

		CDP to provide an integrated approach to align housing with public transport provision. This is adequately covered in the draft CAP action T20.
FIN-C629-52	The climate action plan should prioritise the shift from private car to public transport for longer journeys. In order to do so significant improvements are required to assure connectivity and frequency of services. The action T20 Support the development and expansion of existing public transport services including MetroLink, BusConnects and DART expansion to Balbriggan should not be limited to the mentioned projects but should also target towns that are inadequately serviced, such as Rush. In recent years we have experienced a high influx of residents due to numerous housing developments, but this has not been reflected in the public transport services.	The Council notes these comments. The draft CAP prioritises a shift from private car to public transport. The Council will continue to work with the relevant transportation bodies in support of the Transport Strategy for the Greater Dublin Area (including the NTA, Transport Infrastructure Ireland (TII), Dublin Bus, Luas, Irish Rail, Bus Éireann, and Road Safety Authority) to facilitate and provide support in delivering major improvements to the public transport network, and measures to achieve modal shift.
FIN-C629-60	A one-way system would work and cut emissions in half (Balbriggan). This would allow for a new tree line in the centre of the town, and a scooter and bike lane.	Fingal County Council is progressing a number of projects in Balbriggan that aim to improve active travel infrastructure and initiatives throughout the town. Fingal's Active Travel unit will continue to promote and encourage people to choose walking and cycling as their first choice of travel for short journeys. This work is adequately covered in actions in the draft Plan. We note the reference to transport links.
Park and Ride Facilities		
FIN-C629-56	T21 Park and ride facilities – we would welcome opportunities for these to connect to Dublin Airport.	Connection to Dublin Airport would be considered in proposals for any applicable project under action T21.
		CE Recommendation: No change to draft plan.

Transport		
EV's		
Submission Reference Number	Submission Summary	CE Response
EV Charging Strategy		
FIN-C629-72	The Plan should have an action to implement the EV Charging Strategy 2022-2030	The draft CAP includes action T24: Implement the DLA EVCP strategy through delivery of sufficient EVCP's.
EV Chargers and Infrastructure		
FIN-C629-48	Electric vehicle chargers are required in Ballyboughal, we don't have any and should be able to accommodate ev charging which in turn assists us in the promotion of safer climate action options.	The draft CAP includes action T24: Implement the DLA EVCP strategy through delivery of sufficient EVCP's.
FIN-C629-56	T24 - daa would welcome the opportunity to work with Fingal County Council in terms of provision of EV infrastructure at the airport, including the supporting infrastructure required to support public charging...	The Council notes this comment in relation to the implementation of action T24.
EV Charger Cables and Pathways		
FIN-C629-51	An action relating to EV charging options for residents lacking a driveway and with shared parking should be a priority.	The Council will work with the DLA and ZEVl and advocate for enabling policy and regulatory solutions through the delivery of action T24.
FIN-C629-76	We welcome the work that Fingal CC has undertaken with other partners in developing the Dublin electric vehicle charging strategy. We note with concern the creeping practice of EV charging cables crossing footpaths either unprotected or with makeshift covers over them. We believe that this practice has the significant potential to act as a trip hazard for citizens in particular young children and older people and people with mobility issues who need to use unobstructed footpaths. We would like to see an	

	<p>action included in the FCC CCAP to tackle this bad practice through working with estate management companies and through the amendment of local Fingal bye-laws to make this practice illegal. An awareness campaign to communicate to people that this practice is dangerous and illegal should also be undertaken by Zero Emission Vehicle Ireland (ZEVl) in conjunction with Local Authorities.</p> <p>Proposed CCAP Action: Implement bye laws to restrict ad hoc EV charging in public places including footpaths</p> <p>Proposed CCAP Action: Undertake awareness campaign on EV charge points as part of Dublin EVCP strategy implementation.</p>	
EV's		
FIN-C629-3	<p>I generally accept that EVs emit fewer greenhouse gases (GHGs) while in use, but the action plan should not make the bold claim that over "the full vehicle lifecycle, EVs generate much less CO2 emissions than Internal Combustion Engine [ICE] vehicles". It depends on the number of miles driven by the vehicle owner. Someone who travels c. 5,000 kilometres per year is better off driving an ICE vehicle - or ideally, maintaining whatever vehicle they currently own. This is because the production and recycling of EVs produces more GHGs than that of an ICE vehicle.</p> <p>Furthermore, the average CO2 emissions of diesel-powered cars cited in the action plan is outdated. Most modern diesel cars emit far less CO2 than the figures cited (i.e., 30%-40% less). As the current fleet of privately owned vehicles is upgraded in favour of post-</p>	<p>It is widely accepted that on a lifecycle basis, BEVs emit far fewer GHG emissions than equivalent Internal Combustion Engine (ICE) vehicles, and particularly in Europe where the carbon intensity of electricity generation is relatively low. This has been evidenced by research from the IEA [https://www.iea.org/reports/the-role-of-critical-minerals-in-clean-energy-transitions], the ICCT [https://theicct.org/publication/a-global-comparison-of-the-life-cycle-greenhouse-gas-emissions-of-combustion-engine-and-electric-passenger-cars/], and BloombergNEF [https://about.bnef.com/blog/the-lifecycle-emissions-of-electric-vehicles/] amongst others. The BloombergNEF analysis suggests that the breakeven distance which an EV needs to be driven for equal lifecycle emissions to an ICE vehicle is 27,000 km in the US. In Ireland, cars remain on our roads for about 15 years, and cars owned in Dublin are driven on average 12,500 km per year [https://www.cso.ie/en/releasesandpublications/ep/p-tranom/transportomnibus2021/data/]. This breakeven point would therefore be reached about 3 years into the average car's life. It is highly unlikely that a car will be scrapped before reaching this breakeven point.</p>

	<p>2015 model-year vehicles, average CO2 figures will significantly fall. For example, a 2015 Mini Cooper diesel (a popular car in Ireland) emits 97g/km (34% less than the average figure cited). Or a 2015 1.6 diesel VW Passat emits 105 g/km. And so on. The averages cited for petrol cars should also be revised downward as the private fleet modernises, albeit to a lesser extent.</p> <p>Importantly, no reference to hybrid vehicles is made. This is a viable technology - whether plug-in hybrids or regular hybrids like the Toyota Corolla, which emits c. 100 g/km of CO2 (36% less than the average cited for petrol cars). The BMW 530e plug-in hybrid emits only 46 g/KM of CO2 - far less than the figures cited. Surely, hybrids should be encouraged as part of the transport mix!</p> <p>As for nitrogen oxides, again, 2015 and newer diesel cars emit almost as little NOx as petrol equivalents thanks to exhaust treatments such as AdBlue. And NOx was never a major issue on petrol engines thanks to the lower combustion temperatures. Particulate matter is also low in modern petrol and diesel cars thanks to the likes of diesel particulate filters (DPFs). So, the following wording should be updated on page 57 to at least remove the adjective 'big': "Petrol and diesel vehicles release particulate matter and gases such as nitrogen oxides, which are big contributors to air pollution."</p>	<p>The emissions factors quoted for ICE vehicles are for the average vehicle currently on the roads and the manufacturing emissions have already been created. As correctly pointed out, it is probably better to keep these cars running to their natural end of life rather than scrapping them early and replacing them with a new BEV. However, when they do need to be replaced, the focus should be on ensuring that all new vehicles registered are as clean and efficient as possible. Mild hybrid vehicles, such as the Toyota Corolla and emitting 100 gCO2/km, are not low-emission vehicles.</p> <p>While plug-in hybrids tend to achieve relatively low emission results (<50 gCO2/km in WLTP test cycles), this is not reflected in real-world usage. A study conducted by the ICCT found that real-world emissions from PHEVs are typically 3-5 times the values achieved in official WLTP tests [https://theicct.org/publication/real-world-phev-use-jun22/]. This is largely due to the fact that the test cycle assumes 70-85% of driving will be in fully electric mode, while real-world data suggest this is closer to 45-49% for private cars and just 11-15% for company cars. Separate tests on three new and popular PHEVs, commissioned by Transport & Environment, found that they emitted 3 times more CO2 than their official WLTP test values, had significantly lower electric range than expected, and could not guarantee electric-only operation, despite manufacturers' claims [https://www.transportenvironment.org/wp-content/uploads/2023/02/2023_02_TE_PHEV_Testing_Report_Final.pdf]. Based on the results of these and similar studies, the EU no longer counts PHEVs as "low-CO2" vehicles.</p> <p>The text on page 57 correctly notes that NOx and particulate matter are "big" contributors to air pollution, with transport being a major source [https://www.epa.ie/our-services/monitoring--assessment/assessment/irelands-environment/air/current-trends-air/].</p>
<p>CE Recommendation: No change to draft plan.</p>		

Transport		
Shared Mobility		
Submission Reference Number	Submission Summary	CE Response
Car Sharing Schemes		
FIN-C629-10	<p>As recently discussed, we would welcome the addition of peer-to-peer electric car sharing in the climate action plan, as a solution to reducing transport emissions.</p> <p>We welcome the inclusion of action T22: "Promote and facilitate additional car sharing schemes" in the draft plan. However, compared to regular car sharing schemes, peer-to-peer electric car sharing schemes would be far more effective at reducing transport emissions, due to the fact that no extra cars would need to be manufactured and sold in order to facilitate the scheme. It would instead make use of the existing under-utilised stock of cars sitting in people's driveways...</p>	Noted
FIN-C629-16	We welcome actions T22 and T23 on shared mobility, specifically, we believe that community car sharing for electric cars should be explicitly mentioned here.	The Councils Community Cars are electric.
		CE Recommendation: No change to draft plan

Transport		
Car Parking		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-48	Request for additional public parking in Ballyboughal.	No plans for further public parking in Ballyboughal.
FIN-C629-72	We recommend an action to target anti-social parking e.g., reduce illegal car parking on footpaths, on double yellow lines and in cycle ways, and a target for reduction of incidence of such parking.	Noted. This will require an increase in parking enforcement resources & budget - Reserved Function
FIN-C629-72	National policy in the Climate Action Plan 2023 requires the Council to transition to market pricing for all parking it provides, including on and off street, employee and visitor parking. Making this transition should be an action in the Plan.	Parking fees for the county are set out in the adopted Parking Bye-laws which are reviewed periodically.
FIN-C629-76	<p>We are aware though our members of the increasing number of vehicles in Fingal estates and bad parking behaviour by some residents. Examples include parking at or on corners which completely restricts visibility for active travel. The Fingal Active Travel group would like to see increased enforcement of illegal parking in housing estates where roads have been taken in charge by Fingal County council.</p> <p>Members have also noticed illegal parking on active travel infrastructure across the Fingal area including by organisers of events such as circuses as well as construction vehicles. Any permits or permission for events should specifically prohibit illegal parking on paths and bike lanes to promote active travel to the</p>	<p>Provision has been made for parking enforcement wardens who are assigned to patrol reported locations where illegal parking is ongoing and problematic requiring enforcement.</p> <p>One off incidents of illegal or dangerous parking should be referred directly to AGS as the council have limited parking enforcement resources.</p> <p>The Active Travel unit is currently delivering a programme of Safe Routes to School projects. This includes review of pre-intervention parking arrangements at schools, both legal and illegal.</p>

	<p>event and to ensure general road safety.</p> <p>We look forward to the enforcement of new road safety legislation regarding e-scooters and non ped elec e-bikes. Our members have seen many examples of dangerous behaviour from scooter and e-bikes here that are operating far in excess of safe speeds and violating road traffic laws by breaking red lights travelling on footpaths, public areas and on the wrong side of the roads.</p> <p>In some cases, legal parking along key access routes to schools have made active travel options hazardous. In Castleknock, for example, on-street parking along Old Navan Road leads to cars crossing the center line. Public right-of-way should be prioritised over private use and safe routes to schools established where space exists to do so.</p> <p>Proposed CCAP Action: Prohibit the parking of vehicles or blocking of bike paths and footpaths by event organisers and construction sites in order to promote active travel and ensure road safety</p> <p>Proposed CCAP Action: Increased enforcement of illegal parking at schools in the Fingal area in conjunction with An Garda Siochana.</p> <p>Proposed CCAP Action: Parking review of roads around schools where public right-of-way can be prioritised for safe active travel access to schools.</p>	
		CE Recommendation: No change to draft plan

Transport		
Traffic Management		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-51	Consider adding red light cameras to traffic lights near schools to enhance safety.	There is no provision in National Legislation for the deployment of red-light cameras.
FIN-C629-56	T31 - daa is working to reduce traffic congestion in and around the airport campus by promoting sustainable transport initiatives. Our Mobility Management Department's goal is to promote real sustainable transport alternatives for staff and passengers, including safe and secure cycle and walkways leading to the airport campus, and mass transport options that are available to staff that work on shifts. Therefore, we would welcome to discuss other opportunities with Fingal County Council to achieve this goal.	The Councils active travel team welcomes engagement from the daa in relation to the implementation of the Fingal Active Travel Strategy and the draft CAP.
		CE Recommendation: No change to draft plan.

Transport		
Smart and Sustainable Mobility		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-56	T10 - daa would welcome any opportunities to promote sustainable mobility. We are happy to work with Fingal County Council to discuss potential pilot schemes that could be implemented at the airport.	The Active Travel unit in Fingal County Council will continue to work and engage with stakeholders that are interested in developing pilot projects and schemes that help promote the adoption of more sustainable modes of transport. Adequately covered in the draft CAP. Action T10.
FIN-C629-56	Stakeholder engagement around the provision of sustainable travel in Fingal	The Active Travel Section in Fingal County Council will continue to work and engage with stakeholders that are interested in developing pilot projects

		and schemes that help promote the adoption of more sustainable modes of transport. Adequately covered in the draft CAP.
		CE Recommendation: No change to draft plan.

Transport		
Staff Travel		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-16	For T35 on mitigating the impact of the Council's own business travel, before considering carbon offsets we suggest prioritising a policy of reducing travel as much as possible e.g., meeting remotely rather than travelling (and particularly avoiding flights).	Through the draft CAP the Council is committing to a number of actions which will reduce the need for staff travel - actions T30 to T33. Fingal County Council's Walking and Cycling Officer have been delivering and will continue to deliver a significant programme of events and initiatives to encourage and incentivise Fingal County Council staff to make a transport modal shift from private cars. Examples of this are e-bike loan schemes (allowing staff to trial an ebike for getting to/from work in advance of purchase), staff cycles, staff bicycle maintenance programmes etc. The carbon offsetting action is listed after these as the Council is committing to consider appropriate offsetting programmes for residual business travel. The Council fully appreciates that offsetting does not equate to not raising emissions in the first place.
FIN-C629-51	Action T35: Carbon offsetting programmes do not work, and business travel emissions should be kept to a minimum.	
FIN-C629-72	For T35 on mitigating the impact of the Council's own business travel, before considering carbon offsets we suggest prioritising a policy of reducing travel as much as possible e.g., meeting remotely rather than travelling (and particularly avoiding flights).	
		CE Recommendation: No change to draft plan.

Transport		
Awareness Raising and Education		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-39	<p>With an Active Travel emphasis on trips under 5km, highlight to people what is within that distance. I think that MapAlerter.ie drew a circle around your home or work location - doing this with a 5km radius circle could show people what is within 5km of their home or work.</p> <p>The Safe Routes to School programme sounds great but seems to be very slow to be rolled out. How is its success measured? Are the number of students changing from being driven counted? Are these figures published?</p> <p>My family cycles most places - school, grocery shopping, sports training and social outings. Bringing our bikes on the train massively increases how far we can go without a car. Cycling and walking have great health, mental and social benefits and should be facilitated in every way possible. This means improving cycle infrastructure and pedestrian crossings and allocating more space to both, at the expense of motor vehicles if necessary.</p> <p>T3 Connectivity is very important. Removing discriminatory swing gates will help and also, during planning, ensure that modal filters are available to make walking and cycling the easier option. As an example, the Fernleigh/Annfield estate in Carpenterstown has excellent permeability within the estate.</p>	<p>The Safe Routes to School (SRTS) programme is funded by the NTA, administered by An Taisce and delivered by Fingal County Council. Schools were selected on the basis of shortlisting criteria following on from a call for expressions of interest. Data collection on pre/post-delivery will inform a monitoring and evaluation report for each school and will help develop and improve the overall programme over the next number of years. A number of other schools outside this programme have had SRTS works completed as part of other capital projects being delivered in Fingal. In addition, and following the delivery of the infrastructure, Walking and Cycling Officers are working with the schools to encourage use of the infrastructure. We note the reference to mapping of safe routes. Data prepared in accordance with government guidance and standard will be used for mapping on Fingal Open Data. Adequately covered in CAP, Action T18, T19. To date the Safe Routes to Schools (SRTS) programme has been completed at 5 schools across Fingal with another 3 due to go to construction in Q1 2024.</p>

	<p>T4 - The installation of zebra crossings transforms the pedestrian's crossing experience. If the Department of Transport approves crossings without flashing lights it will make it cheaper and quicker to roll out more.</p> <p>T16 Programmes - I am developing a map of lesser known safe routes in Dublin 15, using quiet and modal filter based routes. Expanding this for the entire Fingal area could help those choosing to change to walking or cycling find safe (and sometimes short) routes. https://umap.openstreetmap.fr/en/map/dublin-15-lowno-traffic-quiet-routes_977480</p> <p>T18 - The Safe Routes to School could also use the above map of safe routes that children (and their guardians) may not know about. A safe route may help guardians feel better about their children changing their mode to walking or cycling.</p> <p>For those with no access to the rear of their property, they should be allowed install bike storage at the front. The planning regulations or guidelines should be updated to avoid the comical situation like in St Lawrence Road in Clontarf where ABP overrode their inspector.</p>	
FIN-C629-39	Measuring success of Safe Routes to School programme.	
FIN-C629-64	<p>Under Transport that Fingal CC “will increase the provision of walking and cycling infrastructure”. The EHS recommends that the construction of walking and cycling infrastructure on its own is not necessarily enough to get move people actively travelling. Investment in understanding the</p>	<p>Fingal County Council's approach to promoting active travel is supported by the collaboration of colleagues in Active Travel, Sport, Active Cities, Community, Environment and Corporate Services to deliver awareness campaigns, promotional materials and events for the public that promote cycling and walking. The provision of new cycling and walking infrastructure is always accompanied by a detailed communications plan,</p>

	<p>behaviours of people, the barriers and enablers to active travel is essential to delivering on an objective to increase active travel.....</p> <p>It is noted how the transport actions include actions to support active travel by staff.</p>	<p>spanning pre-consultation, statutory/non-statutory consultation, project launch and post launch promotion. Separately, and in a manner which complements this work, Fingal County Council promote the adoption and increased use of active modes of travel in general. The Council provides and promotes access to affordable bikes and ebikes, works with schools to support walking and cycling buses and initiatives such as Fresh Air Friday and promotes the Bike To Work scheme to employers as well as our own staff. All of these activities are supported by regular online, podcast, print and radio communications created to support behavioural change. Fingal County Council also amplify government awareness and education campaigns in the region such as 'Your Journey Counts' (2023). Staff initiatives to promote the switch to active modes of travel are considered very important and include regular staff lunch time walks, cycle training for staff and the provision and promotion of showering and bike parking facilities in work locations. In addition to the above, Fingal County Council collaborates with active travel colleagues across the country and have fed into proactive and national communication campaigns being delivered by central government. All active travel infrastructure project includes pre/post-delivery evaluation which always includes transport modal shift. In addition, Fingal County Council feeds into and utilises national data reporting which NTA captures regularly across the walking and cycling public.</p>
FIN-C629-70	<p>Active Travel needs to be promoted more actively by Fingal to local Residents.</p> <p>Eg- schoolchildren of ALL ages can often walk to school.</p> <p>Fingal could in liaison with the HSE put forward the lifelong health benefits physical & mental, increasing independence of young people & social engagement with young people with each other, lowering of emissions etc by directly requesting of Principals to hold annual Parent School Meetings to recommend active travel/public transport to school & annually</p>	<p>Fingal County Council's Active Travel Section is committed to engaging with the Fingal community, to promote the benefits of active travel. This work includes communications and information provision and programmes such as 'Learn 2 Cycle' lessons. The Active Travel Section are working with schools, providing resources on the Fingal website, active travel talks for students, and inviting Fingal schools to participate in the Fresh Air Friday initiative. This is adequately covered in the draft CAP, T18, T19</p>

	report back noticeable positive changes at all levels on a yearly basis	
FIN-C629-72	We recommend an action, recognising that we are already doing this with some groups, to deliver or facilitate cycle training for particular groups through the sports partnership.	The Council Active Travel unit has been and will continue to facilitate cycle training across the county. For example, cycle training for people with additional needs, bicycle maintenance for Transition Year students, cycle training for older adults etc. Feedback has been excellent with a resulting increased demand. The Active Travel unit will continue to work in conjunction with the Sports Office of Fingal County Council in this regard.
		CE Recommendation: No change to the draft Plan.

Transport		
Fingal County Council Events		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-51	We encourage the Council to reconsider Joe Duffy BMW sponsorship of the Flavours of Fingal. The outdoor car show element currently undermines the effort to promote Active Travel at this well-attended public event.	Sponsorship is an essential part of this event; we will encourage more promotion of the EV classes of vehicles.
		CE Recommendation: No change to the draft Plan.

Transport		
Monitoring and Reporting		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-72	In line with the goal in the Climate Action Plan 2023, the Plan should "include specific actions and indicators	Targets for transport modal shifts are contained in the NTA's Greater Dublin Area Transport Strategy. Assessment of transport modal shift

	<p>in respect of accessibility, modal shift and active travel”</p> <p>The plan should Support the implementation of the Greater Dublin Area Demand Management Strategy currently being developed.</p> <p>The plan should support the implementation of the Clean Air Strategy.</p>	<p>across the county must be compared to baseline data on transport movements. There are a number of baselines to which we can compare which are scientifically collected, consistent in nature and will continue to be prepared in the future i.e., Central Statistics Office census data, NTA's Cycle and Walking Index (CaWI) and Fingal Citizen's Satisfaction Survey RedC poll. The draft CAP includes many actions with regard to transport modal shift. Adequately covered in draft CAP, T11 to T19</p>
FIN-C629-72	<p>Ireland's transport emissions continue to increase and there is an over-reliance on the increased use of electric vehicles to address this Transport Environmental Protection Agency (epa.ie). In that context, it is disappointing that some measures are only suggested for 2026 or even 2028 (e.g., T14, T15, T35.) This is inconsistent with the urgency required by the Climate Act.</p>	<p>The Council is taking on a substantial body of work in the draft CAP and it will be a five-year plan. Accordingly, all actions will not be complete in the first 1-2 years.</p>
FIN-C629-16	<p>Ireland's transport emissions continue to increase and there is an over-reliance on the increased use of electric vehicles to address this Transport Environmental Protection Agency (epa.ie). In that context, it is disappointing that some measures are only suggested for 2026 or even 2028 (e.g., T14, T15, T34, T35.)</p>	
		<p>CE Recommendation: No change to draft plan</p>

Transport		
Suggested Actions		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-64	Suggested Example Action: Development of a transport system that delivers on the principles of Shift – Avoid – Improve.	Fingal County Council supports the Avoid-Shift -Improve approach through its own Development Plan Policies and Objectives. The Fingal Development Plan 2023- 2029 has a focus on Connectivity & Movement in support of Climate Action and strengthening the integration of land-use and transport planning; with a priority focus on compact growth served by high quality public transport and increased provision of walking and cycling infrastructure. Actions in the draft Climate Action Plan further support this approach.
FIN-C629-64	Suggested Example Action: plan that through land use planning assists people to Reduce or Avoid the need for travel.	
FIN-C629-64	Suggested Example Action: A plan that enables people Shift to more environmentally friendly modes of transport such as walking, cycling or public transport.	Fingal County Council notes comments made by the HSE in relation to active travel. The Council is working to increase the number of people choosing Active Travel for everyday short journeys. This work is reflected in actions T1-T19 in the transport chapter of the draft plan.
FIN-C629-64	Suggested Example Action: A plan that Improves the energy efficiency of vehicle technology – for example perhaps only allowing car share that utilises hybrid or fully electric vehicles.	Fingal County Council notes this comment made by the HSE. Zero Emissions Vehicles Ireland (ZEVI) has been established to support the delivery of a national EV charging network and to further assist citizens, the public sector, and businesses to continue to make the switch to zero emission vehicles. This work is further supported under actions T22-T27.
FIN-C629-76	<p>The Fingal active travel group welcomes the installation of bike counters at different locations in Fingal and wider Dublin region however like any real-time display these counters need to be maintained for the data they collect to be of any use to show the number of cyclists on a given route...</p> <p>Proposed CAP Action: Implement a monthly inspection regime for all Active travel counters in FCC</p>	NTA are collating data from current data counters in Fingal (3no.) into a national data collection. All active travel projects implemented in Fingal County Council are assessed before and after to evaluate the project, as per industry best practice.

	<p>area and prepare annual report as part of Active Travel work programme.</p> <p>Proposed CAP Action: Expand the number of Active travel counters in the FCC area.</p> <p>Proposed CCAP Action: Ensure that all active travel counters are maintained and that active travel numbers are reported as part of annual Climate Action Plan updates</p>	
FIN-C629-76	<p>Fingal CC in conjunction with the EPA should install more real-time air quality monitors in the Fingal area to detect nitrogen dioxide (NO₂), Nitrogen oxides (NO_x) and particulate matter (PM). This information can be used to show the pollution caused by vehicles in urban areas as well as in school zones.</p> <p>Proposed CCAP Action: Include Air Quality pre and post monitoring as part of all active travel projects.</p> <p>Proposed CCAP Action: Increase the number of Air quality monitoring stations in the Fingal area in conjunction with the EPA.</p> <p>Proposed CCAP Action: Support schools in the Fingal area to implement 'no idling' zones or 'clean air zones' at schools</p>	<p>The EPA wish to expand the national air quality monitoring programme and have identified gaps in Fingal (Baldoyle and Balbriggan). The need for this action is independent of climate action.</p>
		CE Recommendation: No change to draft plan.

Transport		
Collaboration with Stakeholders		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-65	Encouraging people to move towards a higher uptake of public and active transport will be critical in reducing GHG emissions. A significant proportion of Meath's population, particularly along the M1, M2, M3 and M4 Motorway corridors, travel to and from Dublin each day for employment and education purposes. Meath County Council would welcome collaboration with Fingal County Council on Transportation and Active Travel projects of mutual interest proximate to or along our shared border.	Fingal County council welcomes the submission by Meath County council and would like to acknowledge the current ongoing collaboration between both Counties in the development of the M2 and M3 corridors.
		CE Recommendation: No change to draft plan.

4.9 Submissions on Section 5 Flood Resilience

Flood Resilience		
SuDS		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-27	Ensure drains are cleared of debris and leaves. This is especially necessary in Autumn before the onset of heavy Winter rain.	This activity is an on-going part of Operations & Maintenance with additional increased yearly revenue provision for the cleaning of Gullies and the carrying out of works to repair broken gullies.
FIN-C629-27	Ensure water flowing down R127 towards Skerries can enter Mill Stream. Fingal Co Co recently did an excellent job and the new wide cuttings prevented flooding under railway bridge during recent heavy rain.	Fingal County Council notes this comment.
FIN-C629-57	Some of the Home Performance Index indicators may support the Council with actions F17 and F18. E.g., EN 3.0 - HPI-Technical-Manual-v3.0.pdf (homeperformanceindex.ie)	Comment noted. The Home Performance Indicators quote reference to the CIRIA SuDS Guide which is aligned with FCC SuDS methodologies.
FIN-C629-57	Going further, the Council could also explore the concept of a “sponge city” as implemented in Copenhagen as a way to make Fingal more resilient.	Comment noted. Fingal County Council implements SuDS in alignment with Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document, Department of Housing, Local Government and Heritage. Many of the concepts of Sponge city are aligned with this.
FIN-C629-60	There is not enough natural seepage of rain, due to overuse of hard surface. Look for areas of hard concrete that could be part dug up to plant hedgerows and trees.	The Flood Resilience and Nature Based Solutions actions in the draft Plan set out the council’s approach in relation to SuDS.
FIN-C629-57	The IGBC support the strong focus on SUDSs and Green Infrastructure in that section. In particular, action F15 is highly welcomed. Private gardens	IGBC supportive comments are welcome and agreed.

	account for a significant part of green areas in Fingal Coco and more could be done to raise awareness about the role of these gardens as raingardens, and the issues associated with hard paving.	
FIN-C629-68	Most citizens aren't aware of sustainable drainage (SUDs) or the potential consequences of flooding in particular residential areas of Fingal in the future. With rainfall set to increase by 20% by 2050, we believe the public need to be made aware of this and how best to adapt.	Fingal County Council is currently working on a Domestic SuDS guide for householders under action F15, and intends to produce a similar document for schools in the future. These will be well communicated.
FIN-C629-19	<p>Widespread adoption of blue-green infrastructure in towns and cities would take pressure off the combined sewer and storm sewer networks, contribute to climate resilience and also generate capacity for compact growth as set out in the National Planning Framework. To maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted by UÉ. The removal of stormwater from combined sewers using Sustainable Urban Drainage Systems and Green-Blue Infrastructure in new developments, and retrofitted in existing developed areas, is strongly encouraged and is particularly relevant to the achievement of compact growth objectives.</p> <p>We welcome the commitments of Fingal County Council to sustainable urban drainage and surface water drainage on pages 69 and 70 and to nature-based solutions for sustainable urban drainage on page 76.</p>	The guidance referred to in the submission details how important sustainable drainage is and how it can both improve water quality by using SuDS and prevent flooding by attenuation of flood waters. The Fingal Green Blue Infrastructure Guidance has recently been updated to incorporate any new advancements in SuDS and includes most of the information available in the other documents referenced. All works going forward by Uisce Éireann must comply with the Water Framework Directive and the Floods Directive and in Fingal, that means the works must comply with the Green Blue Infrastructure Guidance to ensure that SuDS is implemented to ensure water quality and that there is attenuation to ensure that green field run-off is maintained or improved on.

	<p>We would also welcome consideration of the following recently published guidance:</p> <p>Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document National (Infrastructure) Guidelines and Standards Group recent NGS Circular 1 of 2023, and DMURS Advice Note 5 Road and Street Drainage using Nature Based Solutions Design Greening and Nature-based SuDS for Active Travel Schemes - National Transport Guidance for Urban watercourses by Inland Fisheries Ireland.</p>	
FIN-C629-21	<p>Allowing householders and builders to create hard surfaces (like cobble lock) from wall to wall in front of houses without leaving soft verges at the sides to absorb rainfall should not be allowed. When it rains the rain has nowhere to go except on to the paths and roads causing flooding.</p> <p>In relation to clearing of drains, I saw netting over metal drains in a city I visited. These nets collected the leaves and debris, and they did not then clog the drains.</p>	<p>The Fingal Development Plan 2023 - 2029 requires SuDS be incorporated into all parts of a development (open spaces, roads, footpaths, private areas) as per the FCC SuDs Guidance Document – Green/ Blue Infrastructure for Development, as amended (Appendix 11 refers).</p>
FIN-C629-72	<p>The increasing trend of removing grass and green spaces to provide concrete or tarmac for parking purposes, including bicycle parking, is a problem. Can all instances where planning permission is granted for new parking spaces within existing front gardens, be granted with a requirement to use permeable paving and include SUDS measures. An action should also be</p>	

	included where the Council should seek to have water permeable surface beneath any bicycle parking infrastructure it installs.	
FIN-C629-27	Require builders and homeowners to use permeable material where front gardens are to be used for parking cars. They should also be required to leave a narrow strip of vegetation in each garden to provide a corridor for wildlife.	
FIN-C629-39	F15 - If not currently required, changing domestic gardens to hard paving should require proper drainage facilities to compensate for the loss of natural drainage.	
FIN-C629-20	<p>Builders have been allowed to tarmac the front of houses with no area for trees or plants left. This facilitates cars but does not allow for any soakage of rainwater. The planning department should require builders and homeowners to:</p> <ol style="list-style-type: none"> 1) only use a permeable material for driveways 2) put in a channel to allow for run off of rainwater 3) allow a narrow strip in each house for vegetation (for soakage but also biodiversity). <p>Permission for the building of houses or commercial properties should NOT be allowed on flood plains. In this regard the land on the Dublin Road at the Milverton side of the railway bridge should be rezoned as a nature conservation area to allow for the preservation and re-emergence of wildlife.</p>	<p>The rezoning of land is a process undertaken during the making of a Development Plan. Fingal County Council recently completed this development plan process in February 2023.</p>
		CE Recommendation: No change to the draft plan

Flood Resilience		
Surface Water Management		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-52	<p>Under Surface Water Management, the actions F12 – F14 should not be limited to Council systems or those taken in charge by FCC. This should include all systems to identify all problematic areas that require attention and upgrade. FCC should work with those responsible for non-council systems to adequately maintain and update their systems as appropriate.</p> <p>The time frame for F12 Record on a GIS layer the council surface water system and make it available to all relevant staff from Operations & Planning. This must include all SuDS systems and flood embankments. Should be completed before the indicated completion date of 2027 as this is a key tool to other actions mentioned in the plan regarding identification and maintenance of infrastructure.</p>	<p>Fingal County Council must work within its statutory powers. It is not empowered to carry out works on private property unless provided for in law e.g., Water Pollution or Water Services Act. There are obligations on land/property owners to ensure they are not in breach of planning or legislation such as the Floods and Water Framework Directive. It is accepted that a comprehensive record system of all assets is a key requisite to having a registration and effective maintenance regime. To this end Fingal County Council will strive to have a comprehensive database of all public assets recorded on its GIS platform by the end of 2025. This should include private SuDS where appropriate and practical.</p>
		CE Recommendation: No change to the draft plan

Flood Resilience		
Flooding		
Submission Reference Number	Submission Summary	CE Response
Flood Defence		
FIN-C629-51	<p>We support the inclusion of urban greening proposals in Local Area Plans and recommend that these tie in with National, County and Local Biodiversity Action</p>	<p>Comments noted. The Council works with the OPW in the design of schemes.</p>

	<p>Plans</p> <p>In relation to Flood Defence, we recommend an action on upstream water retention solutions and a catchment-based approach to address fluvial flooding.</p>	
FIN-C629-61	<p>Thank you to all who were involved in the development of this plan as a considerable amount of work went into it. In my opinion this plan needs to be stronger in terms of planning flood defences, both along the coast and along rivers/streams. Particularly in the Howth Malahide operational area. If F6 contains more than Strand Road Sutton and Santry then this needs to be specified in the plan. F13 is welcome and I hope will be implemented soon.</p>	<p>Fingal County Council notes this comment. Fingal staff do contribute to the national flood plan, however the OPW is the body which decides those which are in the plan and the priority ranking of the schemes.</p>
FIN-C629-33	<p>The respondent expressed frustration at the lack of progress on the strand road Sutton flood defence scheme and said that sandbags placing need to be monitored to ensure they are effective and sealed in the case of sea surge with high tides; and a fear that displaced water from the Clontarf Bay scheme could end up in Sutton. Waiting till 2029 plus for adaption of a new scheme plan and for the OPW to co-ordinate and facilitate is way to slow and way behind Dublin City Council progress.</p>	<p>The OPW is the lead state agency for flood protection measures. The Council is engaged with the OPW.</p>
FIN-C629-16	<p>F5: Progress Flood Alleviation schemes in conjunction with the OPW - including Mill Stream Skerries, Bissett Strand and The Green Malahide Village, Portmarnock Bridge,"</p> <p>Ongoing ecological studies of the Mill stream area, Skerries, point to the potential for natural flood risk management, incorporating existing wetlands, in this small catchment. It is important that OPW engage</p>	<p>Fingal County Council notes this comment. All flood alleviation schemes address ecological issues, information is shared between Fingal County Council and the OPW including any ecological studies. A proposed scheme will be subject to public consultation and will take into account ecological concerns.</p>

	with the Fingal Biodiversity Team to deliver such an ecologically sensitive scheme. An Ecological report on the Skerries Millstream area is due shortly from the Fingal Biodiversity team. We would ask that this engagement is carried out as soon as possible, and not deferred until 2029+ as documented. This is particularly urgent considering the recent flooding in this area.	
FIN-C629-72	<p>“F5: Progress Flood Alleviation schemes in conjunction with the OPW - including Mill Stream Skerries, Bissett Strand and The Green Malahide Village, Portmarnock Bridge,”</p> <p>On this point, ongoing ecological studies of the Mill stream area, Skerries, point to the potential for natural flood risk management, incorporating existing wetlands, in this small catchment. It is important that OPW engage with the Fingal Biodiversity Team to deliver such an ecologically sensitive scheme. An Ecological report on the Skerries Millstream area is due shortly from the Fingal Biodiversity team. We would ask that this engagement is carried out as soon as possible, and not deferred until after 2029 as documented. This is particularly urgent considering the recent flooding in this area.</p>	
Resilience		
FIN-C629-55	Recent storms with heavy rainfalls causing flooding further highlights the urgent need for building climate resilience in the region to include flood defences, water management, and sustainable land use planning.	Fingal County Council notes and agrees with this comment. The DLA draft CAP's are a key part in building regional climate resilience.
CE Recommendation: No change to the draft plan		

Flood Resilience		
Coastal		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-52	<p>F8 Develop a coastal monitoring programme to measure coastal erosion along the Fingal coast. It is noted that this will be set up by 2026. This should be fast tracked and set up immediately. the impact of coastal erosion is visibly evident on both Rush South and North Beach and immediate action is required to protect our coast; therefore, this action should lead to a key Action not included which would include the identification and implementation of measures to protect our coasts. This would involve working with local groups and key strategic partners. Actions should be prioritised, and residents and businesses directly impacted by the coastal erosion should be supported to implement these measures.</p> <p>This monitoring programme should input into the development and implementation of a full coastal protection plan, not just for Portrane, as identified under F4 Develop and implement Coastal Protection Plan for Portrane. This would also input into other actions noted in this section such as F10 Identify sites where flood defence features can be removed or relocated to increase flood capacity of rivers and estuaries.</p>	<p>Fingal County Council is working with the OPW on a pilot Coastal Monitoring Project focused on the Rogerstown Outer Estuary. It is anticipated that the pilot project will be completed during 2024 and the OPW have advised that they plan to extend the coastal monitoring programme having regard to the findings of pilot. The data collected during the monitoring project is already benefiting the Council's plans to manage coastal change in the Rogerstown Outer Estuary including Rush South Beach and the Portrane Peninsula.</p>
FIN-C629-71	<p>Plans around flood management need to include plans for managed retreat from the areas we know will be worst impacted.</p>	<p>The Council is aligning it's approach to flood management with emerging government policies and legislation. In relation to coastal change, the issue of managed retreat has not to date been addressed in relevant legislation.</p>

	CE Recommendation: No change to draft plan.
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Flood Resilience		
Water Pollution		
Submission Reference Number	Submission Summary	CE Response
Section 4 Discharge Licenses		
FIN-C629-37	<p>Having read the plan I did not see mention of section 4 license reviews which will be crucial due to the changing weather patterns and the potential increased risk of pollution events. I would like to propose the inclusion of a review of all section 4 discharge licenses to take account of the changing river flows both high and low and the changing assimilative capacity due to the weather patterns associated with our changing climate. There is some suggested wording below from the LAWPRO proposed actions for inclusion in the Local Authority Climate Action Plan circulated by the CARO office.</p> <p>"Carry out a review of Section 4 Discharges to Water licences to determine if they are fit for purpose to meet projected climate change related risks such as hydrological changes and water temperature increases."</p>	<p>This concern is independent of the draft climate action plan. Section 4 licences are reviewed on a case-by-case basis, if the weather conditions do change, they may be reviewed, depending on the nature of the weather change and the section 4 licence e.g., a discharge to groundwater might not be affected by climate change.</p>
FIN-C629-62	<p>Please include a review of section 4 discharge licenses to take account of the changing river flows both high and low and the changing assimilative capacity due to the weather patterns associated with our changing</p>	

	climate. LAWPRO suggests specific wording in this regard..	
FIN-C629-72	<p>Fingal County Council will be dealing with increased in the coming years as the level of rainfall increases as a result of Climate Change. Managing this will become a challenge for the Council. We feel that the chapter in the Draft plan proposes a number of very positive actions to ensure as a county we are more resilient to flooding.</p> <p>In addition, we would like to see the following actions added to the final Plan.</p> <p>Actions on land to address storm sewer overflows and subsequent discharges into Balbriggan Harbour, the Delvin and many of the county rivers. While we understand the maintenance and operation of the sewer system is the responsibility of Uisce Éireann, the Council can and should play a role in reducing the volume of water that flows into the sewers during rainfall events. We would like to see targeted measures, such as rain gardens, swales and other SUDS systems built into the urban environment in places where storm sewer overflows are most frequent.</p> <p>These systems were designed to deal with infrequent overflow and are no longer fit for purpose in an environment that is so heavily dominated with concrete. The negative impacts on water quality, biodiversity and human health are too great to allow this system to continue as it is currently operating.</p>	<p>Prior to the 1950s sewers were generally combined or partially combined taking both foul and surface water. Since then, developments (and these constitute the vast majority of developments in Fingal) foul and surface water were kept separate. It has not worked out the way intended due to poor workmanship on site and subsequent development such as patios, extensions getting into the wrong pipe. This problem is independent of climate change, it would be relevant to the river basin management plan. Controlling surface water runoff through sustainable urban drainage systems is already a policy of the Fingal County Development Plan.</p>
FIN-C629-72	<p>We also strongly advocate that the Council challenges licenses granted by the EPA for the discharge of raw sewage by Irish Water into our natural water systems.</p>	<p>Wastewater discharge licence requires storm overflows to be compliant with the DECLG guidelines on stormwater overflows. However, this document is out of date and there is an action in the draft River Basin</p>

		District Plan to review and update this document. Any review is likely to take into account the costs and benefits of proposed new standards.
Domestic Misconnections		
FIN-C629-72	Domestic misconnections are a huge problem across the county, and very little is known among the public. An action to target communications to areas where domestic misconnections are a known problem, and offer advice on how to correct the problems, should be included in the draft. A recent example of where this was key, relates to the water quality issues in Balbriggan. A significant misconnection was identified by FCC but the work and subsequent impact was not communicated effectively.	This concern is independent of the draft climate action plan. Mass communications on their own are unlikely to address misconnections. Effectively dealing with misconnections will require significant staff resources on the ground to inspect and enforce rectification of misconnections.
		CE Recommendation: No change to the draft plan

Flood Resilience		
Draft River Basin Management Plan		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-75	The Draft River Basin Management Plan is still yet to be released, it seems pre-emptive for LA's to publish a Climate Action Plan in the absence of the RBMP. i.e. objectives are sought to ensure all rivers meet good status by 2027. In the absence of a published plan, it is hard to see how the FCAP could be in accordance with the water framework directive as the RBMP objectives should be incorporated.	Every Local Authority in the Country is required to prepare and adopt a Climate Action Plan 2024-2029 by February 2024 under the Climate Action and Low Carbon (Amendment) Act 2021.
		CE Recommendation: No change to draft plan.

Flood Resilience		
Misc.		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-64	As an action area Flood Resilience seems too narrow when one views the range of existing and future hazards faced in Fingal. Perhaps a phrase along the line of Disaster Risk Management would better capture the range of hazards from extreme weather to slow onsets events.	The Council considers the use of the six thematic action areas balanced and appropriate.
		CE Recommendation: No change to the draft Plan

Flood Resilience		
Heritage Assets		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-49	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; Including objectives to carry out climate change risk assessments, including condition assessments, for the historic structures and sites in its area; Including objectives to develop disaster-risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area; Including objectives to develop resilience and adaptation strategies for the built and archaeological heritage in its area; Developing the skills capacity within the local authority	Fingal County Council has committed to a series of Actions F24-F29 which address these recommendations from using the findings of the Fingal Cultural Heritage & Climate Change Risk Assessment to prioritise and pilot adaptative and palliative measures for heritage assets in Council ownership (Action F26) to developing maintenance and condition survey programmes for Council owned historic buildings and ancient monuments that are informed by climate change impacts (F24) and conducting research and develop case studies from the Council's historic building stock that undertake pre- and post- works energy performance assessments and devise of appropriate and sensitive retrofitting/energy upgrading of traditional buildings to inform works to other Council-owned properties and to guide private owners (Action E32). The ACOs, Heritage Officer/Archaeologist will be included on the local authority's Adaptation Steering Group.

	<p>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. Recommended that the Architectural Conservation Officer, Heritage Officer and Archaeologist should be included on the local authority's Adaptation Steering Group.</p>	
		<p>CE Recommendation: No change to draft plan.</p>

4.10 Submissions on Section 5 Nature Based Solutions

Nature Based Solutions		
Trees and Hedgerows		
Submission Reference Number	Submission Summary	CE Response
Tree Planting		
FIN-C629-54	Action N9: Better coordination with local groups to engage in tree planting projects. Trees are often distributed during tree week to individuals and groups but there should be a greater focus on identifying suitable areas where they can be planted and maintained.	Comments noted. Action N9 is aimed at targeted Strategic annual tree planting. Action C12 under the Community Engagement theme involves residents and community groups in the establishment of newly planted trees in their area and will aim to improve coordination of same.
FIN-C629-56	<p>daa supports the approach in preserving and restoring habitats. We welcome any partnership opportunities to support nature-based projects that either preserve or restore forests, peatlands and other landscapes to absorb and store atmospheric carbon.</p> <p>N10 – could Fingal share the prepared list of suitable tree species recommended for differing situations / functions and the tree valuation method for compensatory / replacement planting? daa need to be aware of any tree planting/woodland creation schemes around the airport as this may impact frequency of bird strikes.</p>	Under action N10 the Council will prepare a list of suitable tree species recommended for differing situations / functions and make available to developers and other stakeholders following the Guiding Principle of 'right tree in the right place'.
FIN-C629-68	Could the Tree Officer engage with local schools and community groups to involve citizens in tree mapping and tree planting? Young people are keen to help to fulfil the objectives of The Forest of Fingal tree	Under action C12 the Council will Involve residents and community groups in the establishment of newly planted trees in their area

	<p>strategy. As urbanization increases in Fingal and Dublin Airport expands, it is important to increase tree canopy cover, protect green spaces and improve air quality.</p> <p>In addition, a community garden for each housing estate would foster community cohesion, intergenerational links and climate action in a healthy, positive, active way. A dedicated horticulturist could work with the community groups. Food security is something that worries a lot of citizens particularly due to our huge reliance on imports and the impact of extreme weather events on the global food system, therefore growing food would teach citizens about the potential of the GIY movement, even on a small local scale.</p>	<p>Community gardens are managed by local communities and are provided in response to requests from local groups wishing to undertake this activity. A community garden for each estate is not feasible however the Council under action C14 will support community groups to develop climate awareness projects such as community gardens. Under action C8 the Council will also provide resources including funding to schools in Fingal as support to engage in resource management projects. Projects may include composting for schools, gardening and vegetable growing projects.</p>
FIN-C629-16	<p>“N9 – Initiate a programme of targeted Strategic Annual Tree Planting including identifying and mapping priority locations, to include sites suitable for woodland creation. Reviewed in an annual works programme, presenting what is planned for the coming year. Taking advantage of government funding programmes such as the New Woodland Creation Scheme on Public Lands”</p> <p>Identifying locations suitable to encourage the natural regeneration of woodlands should be included in the mapping study. Areas particularly suitable for woodland creation on private lands e.g., adjacent to potential seed sources, along river corridors or in areas with former woodland cover, could also be identified, and an information campaign implemented to inform the public of relevant private</p>	<p>The Council is continuing to upgrade and extend woodland planting with relevant actions in the adopted “Forest of Fingal – A Tree Strategy for Fingal” and the “Fingal Biodiversity Action Plan”. and specifically, Action Ref: N9 of the Fingal Draft Climate Action Plan 2024-2029. Works at a number of locations are already progressing and the Council will avail itself of relevant funding programmes as appropriate.</p> <p>Action N9 will initiate a programme of targeted Strategic Annual Tree Planting, reviewing annual works programme and availing of government funding programs.</p> <p>The Forest of Fingal, a tree strategy for Fingal includes the provision to manage our woodlands to encourage natural regeneration and supplement this with the planting of young native trees.</p>

	government funding schemes such as the new Native Tree Area Scheme, for which no licence is required.	
FIN-C629-16	p.74 – the important role of tree planting and ecosystem restoration in sequestering carbon over the long-term, given the appropriate species and climate conditions, should also be emphasised here, see Summary for Policymakers — Special Report on Climate Change and Land (ipcc.ch).	The important carbon sequestration potential of trees, forestry, and ecosystem restoration is adequately addressed within the Nature Based Solution section of the draft Plan.
FIN-C629-51	Action N10: The National Biodiversity Data Centre provides excellent guidance on planting the right tree in the right place.	Noted.
Trees and Woodlands		
FIN-C629-16	<p>“N2: Map and survey all significant/historic stands of woodland within the county e.g. in excess of 5ha, and review the effectiveness of the protection offered under the Green Infrastructure Network Zoning of woodlands in the County Development Plan”</p> <p>Given the lack of woodland in Fingal, and its fragmented nature, limiting this study to woodlands of more than 5ha would likely miss important small woods that have the potential to be restored and expanded.</p>	This action does not limit the mapping of woodland to 5 Ha. and may include smaller woodlands which have significance due to their antiquity, species composition and habitat considerations. Larger woodlands do however have greater potential for the implementation of protection measures due to their scale and integrity.
FIN-C629-52	<p>N2: Map and survey all significant/historic stands of woodland within the county e.g. in excess of 5ha, and review the effectiveness of the protection offered under the Green Infrastructure Network Zoning of woodlands in the County Development Plan”</p> <p>Why limit this study to 5 Ha. It is already evident of the lack of woodland in Fingal. This study should include smaller areas in order to identify its potential</p>	

	to be restored and expanded. This should also include a survey of habitat.	
FIN-C629-16	<p>"N6: Explore funding models for carbon offsetting to fund wetland and woodland development"</p> <p>It would also be prudent, as part of this study, to explore funding/legal arrangements for biodiversity offsets, to facilitate the achievement of biodiversity net gain for more developments</p>	Action N6 is primarily focused on identifying funding models. Action N3 will review measures to improve Biodiversity net gain on all projects, including biodiversity pilot programme on new build housing.
FIN-C629-16	<p>"N7 - Commission a study to report on the ecosystem services/nature-based solutions provided by Fingal's trees with reference to their economic/climate change adaptation benefits". As the ecosystem services (benefits to humans) of trees in both urban and rural environments are well researched, it is suggested that this study focuses on identifying areas in Fingal where tree planting/natural regeneration may be best targeted to provide optimal ecosystem services</p>	The study will make reference to where tree planting/natural regeneration may be best targeted to provide optimal ecosystem services. This relates to actions in the Fingal Biodiversity Action Plan and the development of the Ecological Network and Fingal County Development Plan objectives.
FIN-C629-16	<p>"N10 Prepare a list of suitable tree species recommended for differing situations/functions and make available to developers and other stakeholders following the Guiding Principle of 'right tree in the right place'"</p> <p>The guiding principle also includes 'the right management' and therefore suitable management regimes for different situations/functions need to be specified as part of this exercise, particularly where the aim is to create a woodland ecosystem. Advice for developers/stakeholders on planting approaches that best avoid tree vandalism would also be helpful.</p>	The "right tree right place "principle takes into consideration how the tree will be managed throughout its life span.

FIN-C629-63	<p>While the vision is clear and can build confidence, the words in the Plan are simply a modest first step to actions that deliver climate integrity. We can also open the new Development Plan and read well worded visions, in the case of Swords, for waves of new hard infrastructure. In Swords, to believe <i>that</i> is possible while an airport wants to relentlessly expand, a Metro is to be built over the next decade or so, and Green Belt land is under re-zoning pressure is a hard ask. (air travel and public transport serve the needs of the wider community while leaving a heavy impact on the resilience of Swords). If an area becomes an emissions hotspot, the consequences for resilience are dreadful.</p> <p>This highlights the value of trees. Some innovative afforestation options, suitable to Fingal and including Swords, are available in new funding schemes. For example, the native tree area scheme and under FT3 and FT4* in the new Forestry Programme.</p> <p>GIM33 has been added to the Development Plan. We need to protect environmental resilience in the Swords area. Enabling progress on GIM33 will preserve and enhance a threatened green resource: GB zoning in Swords. This map-based objective needs to be taken seriously by the people who will lead the CAP and the Swords LAP. The work of the Council to create resilience in the County has to reflect the transformation in approach that will be necessary.</p>	<p>The Councils Parks section will assess the new native tree area scheme and the new Forestry Programme (FT3 & FT4) and may seek to draw down funding as appropriate.</p> <p>Actions in the draft Climate Action Plan support and are supported by the Fingal Tree Strategy and the Fingal County Development Plan.</p>
FIN-C629-51	<p>Action N8: Some mature trees are priceless and should not be removed under any circumstance</p>	<p>Mature and long-established trees are not removed except under exceptional circumstances. However, there are circumstances under which</p>

		trees may be removed such as health & safety etc. In line with the provisions of the Council's tree strategy "Forest of Fingal – A Tree Strategy for Fingal".
FIN-C629-51	Action N6: This action to explore funding models for carbon off setting to fund wetland and woodland development is concerning. Rephrase to explore funding models to invest in the ecosystem services provided by woodlands and wetlands. The return can be seen in flood prevention and related savings.	The Council will aim to leverage funding from various sources to deliver improved climate and biodiversity outcomes.
Hedgerows		
FIN-C629-51	Please include hedgerows in addition to trees as a key nature-based solution, with co-benefits for water quality and biodiversity... Action N7: Include hedgerows in this study. Please include hedgerows alongside any reference to trees	Action N7 Commission a study to report on the ecosystem services/nature-based solutions provided by Fingal's trees with reference to their economic/climate change adaptation benefits. Note: As hedgerows are composed of trees their inclusion is implicit in the actions
FIN-C629-54	Action N7/N10: Include hedgerows in this study. Please include hedgerows alongside any reference to trees. Better standards of hedgerow management too.	
FIN-C629-52	Careful consideration must be given to new and future developments, and these should not be detrimental to the natural hedgerows, habitats etc. Rush has witnessed increased development in recent years and is adversely impacting on the biodiversity of the area. Illegal hedge cutting also needs to be eradicated not only in private lands but also by Fingal County Council. Each and every year the same strips of hedgerows are pruned and 'scalped' in the name of health and safety for road users but if we know these areas are going to cause a problem every year why can they not be cut before the March deadline?	The Council will continue to have a "Best Practice" approach to hedge maintenance in line with the provisions of the Fingal Biodiversity Action Plan and "Forest of Fingal – A Tree Strategy for Fingal".

FIN-C629-60	It would be extremely worthwhile to include hedgerows along with trees when creating new green infrastructure and ensure as much protection as possible for them in the planning process.	The adopted “Forest of Fingal, a Tree Strategy for Fingal”, “Fingal Biodiversity Action Plan” and Fingal Development Plan all include significant references to trees, woodlands and hedgerows, their protection and further expansion. The strategy focuses on tree and woodlands. And the benefits trees and woodlands provide to mitigate against climate change.
		CE Recommendation: No change to the draft plan

Nature Based Solutions		
Food and Agriculture		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-16	Actions N17 - N18: Agricultural Sector. These actions appear to be straightforward and should be accelerated sooner than the current timeframe of 2028.	The Council is taking on a substantial body of work in the draft Plan. These action will be substantially complete by 2028.
FIN-C629-13	Mapping agricultural land-N17- this action can be completed immediately; timeframe of 2028 is far too late.	The Council is taking on a substantial body of work in the draft Plan. This action will be substantially complete by 2028.
FIN-C629-13	N18- this needs to be prioritised, it’s a very simple action- again why is it pushed down the road to 2028- Fingal is avoiding it as evidenced in previous plan.	
FIN-C629-52	N17 – N19 These 3 actions related to the agriculture sector, with a current timeframe of 2028.. These actions should be concluded sooner.. This should include actions to protect and enhance native hedgerows.	The Council is taking on a substantial body of work in the draft Plan. These actions will be substantially complete by 2028. Climate initiatives under action N19 will be developed and agreed between the Council, farmers and other stakeholders. Potential projects include rewilding, wetland & pond creation (Hare’s Corner), alternative crops (Typha or Hemp for construction materials), river & floodplain restoration.

FIN-C629-13	N19- This action needs to be further explained in the plan- give an example of climate initiatives co-created with local farmers and other stakeholders.	Farmers will also be encouraged to submit ideas to the Council on what they can do on their farm for climate & biodiversity action.
		CE Recommendation: No change to the draft Plan

Nature Based Solutions		
River and Wetland Restoration		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-51	Action N14: Please ensure that all personnel working on the Our Balbriggan project are made aware of the wetland and river restoration project for the Bog of the Ring and the Matt/Bracken River in Balbriggan	Noted. The Councils Planning Dept is collaborating with Our Balbriggan team in relation to same.
FIN-C629-54	Action N14: We welcome the wetland and river restoration project for the Bog of the Ring and the Matt/Bracken River in Balbriggan. Greater consultation with all stakeholders needs to happen urgently as there will be works taking place downstream under the Our Balbriggan project which may impact plans for upstream.	Noted. The restoration project of the Bog of the Ring and Matt/Bracken River will be subject to significant consultation from the start of the project with the public, landowners and other Council Departments including the Our Balbriggan team.
FIN-C629-12	Bogs are massive carbon sinks and restoring / extending them should be a priority. In addition, bogs can be economically useful * feeding water buffalos (less CH4 than dairy cows). * Reed can be harvested and used in the building industry. * many other benefits	Wetland restoration projects are included in the Fingal Biodiversity Action Plan at the three estuaries, St Itas, Bog of the Ring and Garristown Bog. The Council wishes to work with landowners at these sites to explore alternative farming models such as farming Buffalo or paludiculture.

	This is called paludiculture, please include planning for this aspect in your framework.	
		CE Recommendation: No change to the draft plan

Nature Based Solutions		
Engagement with Stakeholders and Awareness Raising		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-60	An important part of the education will be to shift people's mind away from "manicured" to "natural beauty" In Balbriggan, there is currently a campaign to remove the marram grass from the beach, which shows a complete lack of education on why we need nature to support our future. This grass will hold together the sand and protect the beach. With the increasing number of storms, this grass will be vital to prevent sand loss..	A mindset shift from manicured to a more natural beauty is supported through the Environmental Awareness work Programme and through actions C1-C8 and C11-C12 in the draft Plan.
FIN-C629-65	Regarding Nature-Based solutions a number of NATURA 2000 sites cross the border between Fingal and Meath or are within 15km of the border and we would welcome collaboration on biodiversity projects and initiatives of mutual interest.	Noted. The Council will continue to engage with the relevant sections within Meath County Council regarding NATURA cross border sites and collaborate on relevant projects.

FIN-C629-57	Action N15 is welcomed, but more could be done with private gardens. Private gardens account for a significant part of green areas in Fingal Coco and more could be done to raise awareness about the role of these gardens as raingardens, and the issues associated with hard paving.	Fingal County Council notes this comment made by the Irish Green Buildings Council. Action C5 ' <i>Develop a library of climate material including webinars, books, articles and digital training resources covering climate science, climate action, just transition, the LACAP, national and local climate action plans and make available to the public through Fingal's social media channels and Fingal Libraries</i> ' will support householders in understanding the role their private gardens can play in supporting green infrastructure and biodiversity for example it will support the development of the guide ' <i>a Householders Guide to SuDS</i> ' as stated in the flood resilience section of the draft plan and other materials .
		CE Recommendation: No change to the draft plan

Nature Based Solutions		
Pesticides		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-23	It is unclear to us from the Plan how Fingal uses and plans to use pesticides and weed killers in its parks, golf courses and other public spaces. Both products can have severe implications for biodiversity, and we would welcome clarity on their current and future use in the Plan.	Fingal County Council is continuing to limit and phase out the use of pesticides and weedkillers in favour of environmentally friendly products and approaches to urban design and open space leading to increased areas of biodiversity and rewilding in our parks and open spaces e.g. No Mow May. These initiatives are also referenced in our open space strategy "Keeping It Green" and the Council's Biodiversity Action Plan.
FIN-C629-52	Use of sprays must stop.	
FIN-C629-66	Dún Laoghaire-Rathdown County Council banned the dangerous pesticide glyphosate in 2017, and the European Parliament are currently trying to ban its use EU-wide. As alternatives become more widely available (https://bit.ly/GreensGLY), Fingal County	

	Council should include a provision within this climate action plan to ban glyphosate, for its danger to biodiversity and mammals.	
		CE Recommendation: No change to the draft Plan

Nature Based Solutions		
Biodiversity		
Submission Reference Number	Submission Summary	CE Response
Pollinators		
FIN-C629-52	N15 Increase pollinator areas in public parks and open spaces. FCC should work closely with community groups and Residents Associations in the identification of suitable pollinator areas. This action should also include the identification of native hedgerows and any actions required to maintain and protect them.	Noted: This approach is continuing through our “Local Biodiversity Action Plans” which are being developed in collaboration with local stakeholders such as Tidy Towns groups.
FIN-C629-16	The council are to be commended on Actions N11 to N14, particularly regarding the planned implementation of restoration projects. More specific and ambitious targets for Action N15 should be set.	The extent of wildflower areas managed by the Council has increased in recent years and now measures in excess of 300 Acres.
Biodiversity and the Built Environment		
FIN-C629-57	Action N10 is highly welcomed and needed. The IGBC would be delighted to share the document with its members and the “Biodiversity & the Built Environment” community of practice when ready.	Noted. The Council will aim to make ‘The right tree in the right place’ recommendations available to developers and other stakeholders and will welcome the IGBC sharing same.

FIN-C629-57	<p>N3 action is highly welcome and aligned with recent development in the UK and Europe. Reviewing the Ecology indicator used as part of the Home Performance Index (HPI-Technical-Manual-v3.0.pdf (homeperformanceindex.ie)) – EN5.0 – may be helpful there.</p> <p>In May 2023, the IGBC launched its "Biodiversity & the Built Environment" Community of Practice. The group meet quarterly and are working on developing a comprehensive set of case studies on how to protect and enhance biodiversity in various building typologies (existing and new). We would be delighted to share our findings with Fingal CoCo when ready.</p>	<p>The Council will be happy to avail of these findings. The Fingal Biodiversity Plan also includes the development of several guidance documents for biodiversity and new developments: Action 31 relates to the preparation of guidance on how to incorporate Biodiversity in new developments and infrastructure projects. Action 33 relates to the preparation of planning and design guidance on nett biodiversity gain.</p>
FIN-C629-16	<p>p.18 "By providing networks of natural wildlife corridors through the urban environment we will help animal and plant species migrate through the changing landscape."</p> <p>"Changing landscape" should be clearly defined here. It is important that the trade-offs in multi-use corridors (e.g., greenways) intended for climate, people and biodiversity are fully acknowledged and factored into site selection and design, as high disturbance levels will not deliver much benefit for biodiversity.</p>	<p>Fingal County Council notes this comment. While the Council appreciates the 'trade-off's that have been mentioned in this comment, the list on p.18 is an indicative list of co-benefits is non exhaustive. The text and actions included in the chapter 'Nature Based Solutions' speaks to this comment for better overall climate and biodiversity outcomes.</p>
FIN-C629-57	<p>The IGBC would like to encourage the Council to map existing and potential wildlife corridors across the county, as this would be helpful to developers (in supporting net gain) and landowners.</p>	<p>Wildlife Corridors are included in the Green Infrastructure Network or Ecological Network in the Biodiversity Plan and the County Development Plan. Action 32 in the Biodiversity Plan will result in the preparation of a planning and design guidance for ecological corridors.</p>
		CE Recommendation: No change to the draft plan

Nature Based Solutions		
Marine Protection Studies		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-52	<p>N12 Carry out feasibility studies of developing a Marine Protection Area along the Fingal Coast and on the restoration of Oyster beds, Shellfish beds, Seagrass beds and Kelp stands / N13 Restore marine ecosystem along Fingal coast by supporting restoration projects of Oyster beds, Shellfish beds, Seagrass beds and Kelp stands</p> <p>Both of these actions have a timeline of 2026, however N12 should inform N13. And should tie in with the Revitalising Our Seas Initiative: Identifying Areas of Interest for Marine Protected Area Designation in Irish Waters</p>	<p>The government recently designated much of the marine environment along the Fingal coast as a Special Protection Area. It is our understanding that this area cannot be designated as a Marine Protection Area at the same time. This situation does not preclude the council from proceeding with N12 and N13. These actions are running parallel, whereby small-scale trials have started to determine how to restore particular habitats and mapping will start in 2024 to establish the best places along our coast where these trials can be scaled up to large scale marine ecosystem restoration initiatives.</p>
		CE Recommendation: No change to the draft plan

Nature Based Solutions		
Zoning		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-27	<p>Change the zoning on land on Milverton side of railway bridge from Light Industrial to Nature Reserve. This area is a flood plain and any building on this land would be likely to increase flooding under adjacent railway bridge and at entrance to The Mill. Perhaps Fingal might purchase this piece of land and preserve the wildlife already there.</p>	<p>The rezoning of land is a process undertaken during the making of a Development Plan and is outside the scope of the draft Climate Action Plan. Fingal County Council recently completed this development plan process in February 2023.</p>
		CE Recommendation: No change to draft plan.

Nature Based Solutions		
Risk Assessment		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-64	The EHS recommends that Fingal CC adopt the principle of Do No Harm and to assess the potential risks to health and opportunities in everything it does. Impact may be positive but may be negative. Impact may be intended but may also be unintended.	Fingal County Council notes this comment made by the EHS / HSE in relation to the draft Climate Action Plan.
		CE Recommendation: No change to draft plan.

4.11 Submissions on Section 5 Circular Economy and Resource Management

Circular Economy and Resource Management		
Food Waste		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-16	The food waste actions (R11 and R12) focus on waste segregation; we encourage the Council to add actions on food waste prevention.	Fingal County Council welcomes comments in relation to food waste. Fingal County Council recognises the importance of food waste prevention and works in partnership with the EPA Stop Food Waste office to deliver food waste campaigns annually. The Food Waste Prevention Roadmap 2023-2025 commits to delivering a sustained communications and awareness programme, principally through Ireland's Stop Food Waste Programme, led by the EPA. Fingal County Council will continue to follow guidance from the EPA Stop Food Waste Office with regards to targeted campaigns and actions relating to food waste. Action C3 'Develop an annual calendar of climate action and environmental awareness days of significance which will include international and national days' will include campaigns in relation to food waste such as National Food Waste Recycling Week and National Stop Food Waste Day. Action C4 'Utilise various forms of media including FCC social media, FCC website, newsletters, and cinema campaigns to promote climate action awareness' and action C5 'Develop a library of climate material including webinars, books, articles and digital training resources covering climate science, climate action, just transition, the LACAP, National and Local Climate Action Plans and make available to the public through Fingal's social media channels and Fingal Libraries' will increase awareness and focus on communication to the public about food waste prevention. Action C8 'Provide resources including funding to schools in Fingal as support to engage in resource management projects. Projects may include composting for schools, gardening and vegetable growing projects, resource packs and installation of water butts.' This
FIN-C629-52	Targeting FOOD WASTE is not addressed in the plan despite the fact that food waste at production, point of sale and household is a huge waste stream in Ireland. Ireland aims to half its food waste by 2030. In order to achieve this, the plan should include measures that will contribute to this.	

		action will extend efforts to promote best practices in schools for preventing food waste, building on the progress made so far.
		CE Recommendation: No change to draft plan.

Circular Economy and Resource Management		
Construction and Demolition		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-57	The inclusion of an action to reduce construction & demolition waste (R8) is highly welcomed. In Europe, the construction industry is responsible for 50% of all extracted raw materials. Furthermore, construction products and buildings are the main source of waste generation in the EU, representing 30% of our total waste, with most materials still ending up in landfill.	Fingal County Council notes this comment made by the Irish Green Buildings Council.
FIN-C629-57	Requesting pre-demolition assessments, presenting the environmental and economic case for repair or replacement. In cases where demolition is an appropriate course of action, request waste audits conducted by external auditors ahead of demolition to further support the mitigation of Construction & Development Waste (CDW).	Pre-demolition surveys and waste audits are an integral part in the development of comprehensive Resource & Waste Management Plans for Construction & Demolition Projects. This approach will be encouraged as part of the Planning application process to promote reuse of material and repair, if possible, to help reduce the generation of C & D wastes and reduce the use of virgin materials.
FIN-C629-57	A number of initiatives have been developed by the Irish Green Building Council that FCC may be interested in such as 1/ a Roadmap on Circularity in Construction and 2/ an Excess Material Exchange Platform as part of the Construction Material Exchange (CMEx) Project. http://www.igbc.ie/construction-materials-exchange/ .	The development of a roadmap on circularity in construction is a very welcome initiative which should help in terms of reuse, repair and exchange of C & D materials and promote circularity and sustainability. The Excess Materials Exchange Platform could also play a significant role in ensuring that C & D materials continue to have a value beyond their initial lifecycle and will be examined by Fingal County Council with a view to promoting this initiative as part of the Planning Application process.
		CE Recommendation: No change to draft plan.

Circular Economy and Resource Management		
Circular Economy Initiatives		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-52	The submission suggest that the CAP should include an action to facilitate communities to set up and manage swap shops, repair café, libraries of things etc.	Fingal County Council notes this comment regarding circular economy initiatives. The Council is committed to promoting the circular economy with the public through action R13 and R14 'Prepare and implement a Circular Cities Action Plan'. Facilitating circular initiatives with communities is supported by the Environmental Awareness section and is captured under actions C1, C2, C3, C4, C5, C8 and C11.
FIN-C629-68	Students are keen to move away from fast fashion and explore sustainable ways to source new clothes. Swap Shops by age as well as by occasion are a great idea and have huge potential if advertised widely.	Fingal County Council's Environmental Awareness section supports schools and communities with swap shop workshops and swap shop kits, as well as providing funding for circular economy workshops as requested by the schools. This work is supported by action C6 'Engage with the DLA to scope requirements for delivering climate action awareness in schools through training providers, in advance of climate action awareness being mainstreamed within school curriculum' and action C7 'Engage with schools and An Taisce and provide resources and funding to deliver green flags and achieve Green Schools status.
FIN-C629-72	Action R19 includes the wording "Identify other used items that could be collected at the Civic Amenity Centre and re-purposed, re-imagined or repaired for reuse." We feel that this should be a separate action point so that focus is given to this task as a separate action from the current action of providing paints, musical instruments and bicycles which are given to community groups for reuse. We believe that where a community group does not exist for these goods to be re-purposed, re-imagined or repaired that the Council	The Council notes this comment made in regard to repairing and repurposing furniture and bulky goods. While the Council's capacity to offer recycling space for large items in need of cleaning and repair is limited, the Environmental Awareness section works with the Eastern Midlands Regional Waste Planning Office to promote repair, reuse and recycling with communities and the public. The Council provide different educational material to raise awareness about repairs and work in partnership with the National Centre for the Circular Economy The Rediscovery Centre to host workshops and engage with the public about upcycling and repair options. The Council will continue to facilitate this work under action R19, C2, C3, C4, C5 and C11.

	should create the means to bring these items into back into circulation itself.	
FIN-C629-52	<p>Identify waste products that could be reused in other businesses. E.g., waste of one business could be reused by another business. E.g. packaging, wrapping, waste by products.</p> <p>In a survey Rush Tidy Towns undertook in 2020, 1 business cited why they could not change to recyclable packaging “We looked into getting recyclable packaging for our products, but the cost was extremely high and in order to keep our costs down due to numbers of competitors we could not justify the massive investment as profit margins are already extremely low” Further, this business was anxious of any health and safety repercussions if he accepted / promoted reusables for his food products.</p>	<p>The Economic Development section will engage with businesses on the opportunities for (re) use of waste materials including packaging under Objectives R13 and R14 through the Sustainable Fingal Initiative and through the Council’s Circular Cities Action Plan. The re (use) of waste materials including packaging aligns with the circularity principles which will be embedded in the Council’s Economic Development Strategy which will be published in Q1 2024. The Council will promote public awareness of green/sustainable practices to promote sustainability in the supply chain, as consumers become more climate conscious, sustainability principles will be pulled through the supply chain and encourage innovation in this area as a competitive advantage.</p>
FIN-C629-72	<p>Two repair cafes have taken place in 2023 in the Fingal Makerspace in Blanchardstown Library. These were excellent and saved many items from landfill by providing residents with the option of having these items repaired. An action point should be included in the plan where the Council should be making repair cafes available in each of its’ libraries and community centres across the county. The tracking measure will be the # of items repaired annually with the aim of increasing this number year on year.</p> <p>The Council should also seek to engage with schools and community groups with the purpose of bringing repair cafes out into the communities where a library or community centre is not available. This will reduce the distance that people living in these areas will have to travel to use the cafes and repair items meaning</p>	<p>The Council notes this comment made in regard to repairing items. The Environmental Awareness section work with the Eastern Midlands Regional Waste Planning Office to promote repair, reuse and recycling with communities and the public. The Council provide different educational material and workshops to communities and schools to raise awareness about repairs and work in partnership with the National Centre for the Circular Economy ‘The Rediscovery Centre’ to engage with the public about upcycling and repair options. The Council will continue to facilitate this work under action R19, C2, C3, C4, C5 and C11.</p>

	they will be more likely to do it. Engaging with schools will normalise and encourage repairing instead of replacing.	
FIN-C629-66	The promotion of Repair Cafes are an excellent way to introduce more sustainable lifestyle choices and involve local people in the process. There are currently Repair Cafes popping up in Fingal in areas like the Blanchardstown Library and the Boiler House in Ballymun, but Fingal communities would benefit hugely from a set date where residents can visit a Repair Cafe, such as the first Sunday of every month as is the case in many Repair Cafes in Belgium.	
		CE Recommendation: No change to draft plan.

Circular Economy and Resource Management		
Green Public Procurement		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-18	It is positive to see Fingal County Council's intention to lead by example through Green Public Procurement actions, in order to reduce its own waste and improve its land use management. We would encourage the Council to work with established organisations in this area, including the Community Resources Network Ireland.	Fingal County Council welcomes the submission from Global Action Plan in relation to Green Public Procurement. The Green Public Procurement Strategy is currently under development and this suggestion will be considered.
FIN-C629-62	It is requested to consider focusing on the Balbriggan Decarbonisation Zone with more advantageous Award/Selection Criteria for procurement suppliers that specifically adhere to Green Public Procurement	Fingal County Council welcomes the submission from the Socratics Think Tank in relation to the Decarbonising Zone and Green Public Procurement. The Decarbonising Zone Action and Implementation strategy will begin development in 2024 and this suggestion will be considered.

	<p>recommendations and requirements. Procurement is mentioned in the Balbriggan DZ area, but it would be great to see the Balbriggan DZ mentioned in the primary procurement sections as well to be a testing ground for innovative procurement business models and circular procurement opportunities.</p>	
FIN-C629-72	<p>We welcome the inclusion of R1 “develop a Green Public Procurement (GPP) Strategy” and associated actions. We feel that the Council should be leading by example and that part of this should be restricting the volume of Council merchandise created and that any merchandise that the Council creates should be sustainably produced. The Council should provide accountability of this on its’ website to encourage others to consider creating a smaller volume of better-quality sustainable merchandise. For example, Fingal Wellbeing merch was recently distributed at a Council meeting and included a number of items where one, sustainably produced item, or indeed none, would have sufficed. An action point seeking to do this should be included in the plan.</p>	<p>The Green Public Procurement (GPP) Strategy will aim to ensure that all merchandise is sustainably produced. The Council will also aim to reduce the volume of unnecessary merchandise in favour of a smaller volume of better-quality sustainable merchandise.</p>
FIN-C629-57	<p>The inclusion of actions on GPP is highly welcome as the Council can really drive change in the market through its procurement process. In relation to the built environment, the Council should consider using the indicators of the European Framework for Sustainable Buildings (Level(s)) as recommended in the Energy Efficiency Directive. The “Implementation of Circularity, WLC and LCC in Public Construction Projects” handbook developed by the IGBC might be helpful: IGBC_March23_Handbook_digital.pdf.</p>	<p>Fingal County Council have reviewed IGBC's helpful handbook “Implementation of Circularity, WLC and LCC in Public Construction Projects” and it is assisting in our GPP considerations.</p>

FIN-C629-57	The IGBC would also encourage Fingal CoCo to use the “energy efficiency training clause” as part of public procurement for energy renovation to improve quality assurance and build capacity in the industry. The use of the clause has been successfully piloted by DCC and is widely use in France. More information at: D3_3_full_version.pdf (busleague.eu).	Fingal County Council are reviewing means of including energy efficiency training clauses in contractor tender evaluations and the BusLeague document provided will assist in developing further Green Public Procurement processes.
		CE Recommendation: No change to draft plan.

Circular Economy and Resource Management		
Fingal County Council Events		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-51	Action R16: All FCC events should be free from single-use plastics and use reusable crockery.	Fingal County Council notes comments made by Biodiverse Balbriggan and Rush Tidy Towns in relation to single use items at Fingal County Council Events. The Council continue to work on reducing the carbon footprint of Council supported events. The suggested action has been in place since 2016 and part of the Events Greening Guide. All events organised, funded, or promoted by the Council are required to adhere to this guide. All traders, contractors are encouraged to re-use plastics and not to use single use plastic.
FIN-C629-52	To further support Fingal’s aim to Lead by example it should ensure that all Fingal events are single use plastic free, use as much reusable items as possible and in the action R16 Reduce carbon footprint of Council supported events.	
FIN-C629-76	We also feel that the event licensing and procurement process to run these events is out of date, lacks the prioritisation of sustainability and can be significantly improved by FCC. Proposed CCAP Action: Specify Green procurement criteria in all Fingal tenders and prioritise	The Council notes this comment made by Fingal Active Travel Group. A procurement framework for events management currently in progress gives a higher priority to sustainability and carbon offsetting.

	the sustainability and environmental performance of all contractors in Fingal Events Tender	
FIN-C629-76	Proposed CCAP Action: Ban single use plastics at all Fingal events and specify electrical /renewable power supplies for event contractors to replace generators.	This action has been in place since 2016 and part of the Events Greening Guide. All events organised, funded, or promoted by FCC are required to adhere to this guide. All traders, contractors are encouraged to re-use plastics and not to use single use plastic. The events unit have introduced (where available) solar, and battery powered generators. Since Covid Fingal County Council Events only use Hydro Treated Vegetable Oil renewable sources which has replaced all diesel-powered generators. In 2022 Fingal County Council were the first Local Authority to ban fossil fuelled vehicles in all parades. More engagement and guidance is needed to the 100's of community organisations that participate in these events.
		CE Recommendation: No change to draft plan.

Circular Economy and Resource Management		
Provision of civic amenity sites/bring banks		
Submission Reference Number	Submission Summary	CE Response
Extending the network and opening hours of civic amenity sites		
FIN-C629-11	Two sites across the breadth of Fingal to recycle/repair electronics and domestic-use cooking oil etc. is completely insufficient. I am alarmed that, within the draft, no propositions were made to include the creation of more civic amenity sites of said kind that may be accessed without the need to drive many miles (in the case of North Fingal residents accessing The Malahide Estuary Site) to access this service.	The Draft CAP includes action R17: Extending opening hours in Coolmine in line with Estuary Recycling Centre. The network of bring banks is being extended by 3 sites each year. A review on the establishment of an integrated, consolidated coordinated network of Civic Amenity Site and the transition to a more circular economy has commenced under the auspices of a CCMA National Working Group.
FIN-C629-16	R18 - expanding the Bring Bank network Additional civic amenity sites, the provision/expansion of community repair and recycle spaces in our towns	

	<p>and villages, and the provision/expansion of deposit and return scheme facilities.</p> <p>R17 - extending opening hours in Coolmine in line with the Estuary Recycle Centre</p> <p>It would be helpful to also extend the opening hours of both centres to include Sundays. For many people, the weekends are the best time to visit a recycling centre and limiting the opening hours to Saturday only is restrictive. As above, we also believe that additional Civic Amenity Sites are necessary given Fingal's size and population.</p>	
FIN-C629-72	<p>For many people, the weekends are the best time to visit a recycling centre and limiting the opening hours to Saturday only is restrictive.</p> <p>Consideration should be given to including an action to conduct a feasibility study into adding additional Civic Amenity Sites given Fingal's current size and population, plus projection population growth. People will be more likely to use these centres if they are closer and currently some of the population have a considerable distance to travel to get to the two centres currently in operation. Additionally, reducing the distance to Civic Amenity Sites will reduce carbon emissions created by travelling to the existing centres.</p>	
FIN-C629-54	<p>Action R17: Aim to add new Civic Amenity Centres in Fingal. For example, reinstate the recycling centre in Balbriggan. This may increase recycling and reduce car journeys.</p>	
FIN-C629-32	<p>The draft plan states "The Council will work to support targets in The National Waste Plan for a Circular Economy 2023-2029[43] by promoting, encouraging, and facilitating high levels of recycling and reuse, and</p>	<p>The draft CAP includes action R17: Extending opening hours in Coolmine in line with Estuary Recycling Centre.</p>

	<p>by providing Civic Amenity sites and a network of bring banks across the County.”</p> <p>With this in mind I would welcome the extension of the opening hours of Coolmine Bring/Recycling Centre to match those of Estuary Centre.</p>	
FIN-C629-39	R17 - Extending the Coolmine Civic Amenity Centre hours would be a great benefit. Sunday opening would further distribute the demand.	
Extending Bring Bank Network		
FIN-C629-52	The submission suggests expanding the bottle bank network beyond 3 per year particularly in area of population and development.	The Council currently delivers in excess of three new bottle banks sites each year. However, delivering new sites is challenging due to issues with noise in residential areas, collections by a heavy goods vehicle and ensuring there is a stopping location for vehicles using the bottle banks. The Council constantly review methods to increase the number of bottle bank sites throughout the county and in areas of development as part of its activities.
		CE Recommendation: No change to draft plan.

Circular Economy and Resource Management		
Waste Segregation and Management		
Submission Reference Number	Submission Summary	CE Response
Segregated Waste Collections		
FIN-C629-52	Improved, and increased opportunities for segregated collection across all sectors must be increased in order to capture recyclables and biodegradable waste.	The Fingal County Council Segregation, Storage and Presentation of Household and Commercial Waste Byelaws are being enforced to ensure better segregation of waste and use of a 3-bin system for both household and commercial premises. A Waste Presentation Byelaw project is currently underway to identify households who currently don't have a bin collection service in place through the use of Eircodes. Commercial premises are also being examined through a separate project to ensure a 3-bin system is in place and being appropriately used to promote segregation and increase recycling (mixed dry recycle and food waste). https://www.fingal.ie/waste-bye-laws-project-2023-2025
FIN-C629-52	Development of a plan to introduce a brown bin system in apartment blocks is welcome. (R9) Management companies have been asked to submit a waste management plan for brown bin implementation and to have the service in place within an agreed timeframe. Engagement with the property management companies is ongoing. Management companies should be made responsible for the provision of such and such face adequate consequences if they are not in compliance with legislation.	A Brown Bin Apartment Project is underway encompassing all of Fingal to identify apartment complexes and associated property management companies to assess compliance with the Waste Bye-Laws/Food Waste Regulations with a particular focus on brown bin waste (presence of brown bins and use thereof within apartment complexes). Management companies have a responsibility to ensure that a 3-bin system is in place and that residents are fully aware of their obligations to separate waste and dispose of it in an environmentally friendly manner.
FIN-C629-66	Fingal County Council has supported Free Electrical Recycling days in the past, and this would be a great climate-friendly initiative to institutionalise in this 2024-2029 CAP, perhaps once annually.	This will be considered under action R13: Prepare Circular Cities Action Plan

FIN-C629-52	The submission suggest that the Council should work and support retailer with the introduction of the deposit Return Scheme.	The Council will work with all relevant parties to support the roll out of the Deposit Return Scheme.
Waste Management		
FIN-C629-72	Recycling Centres - In Fingal we have two "recycling centres." Using the phrase "recycling centre" is misleading as it suggests that every item that enters the centres ends up being recycled. Using this phrase has resulted in a situation where people are dropping items off at these centres without considering where they end up - they just assume they are recycled. The Council should provide information on what happens to items that are collected in these centres. They should indicate what volume of the items collected at these centres is actually recycled, what volume ends up back in circulation and how much ends up in landfill. These figures should be reported annually, broken down by quarter, and the Climate Action Plan should seek to ensure that the percentage ending up in landfill should be continually reducing.	The Council welcomes comments in relation to waste management. The permitted waste collector for Fingal's Civic Amenity sites collects, sorts, and treats waste collected. The Council works in partnership with regulatory bodies in relation to waste management such as the EPA and the Eastern Midlands Regional Waste Planning Office to better understand waste trends and data in relation to its management. The Council will continue to work in partnership with these organisations. Publicly accessible data on waste collection and characterisation models can be obtained from the EPA. The Council will continue to raise awareness about how different waste streams are treated with the public under action C5 and will include EPA statistics where available.
FIN-C629-68	Students wonder if the plastic/paper that they collect and put in green/recycling bins is actually recycled.	Fingal County Council notes this comment. The destination of collected waste is a matter for the permitted waste collector.
FIN-C629-52	Segregated support business to correctly segregate waste through additional information and guidance. A major barrier to all businesses implementing correct waste segregation is a lack of space for waste bins. Is bin sharing an option?	A significant amount of information and guidance material is currently available to businesses through the www.mywaste.ie website at https://www.mywaste.ie/business/ . Bin sharing is an option within the current Fingal County Council Segregation, Storage and Presentation of Household and Commercial Waste Bye-Laws however all waste and associated waste receptacles, storage arrangements, use and maintenance etc need to comply with the Waste Bye-Laws.
		CE Recommendation: No change to draft plan.

Circular Economy and Resource Management		
Engagement and Collaboration with Stakeholders		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-52	There is no mention of engaging with local Businesses and producers, either directly or through the Local Enterprise Office or other relevant partners. This sector represents a significant opportunity to improve on sustainable design, the repairability and reusability of products potentially for remanufacturing etc.	The Economic Development Section will engage with businesses on sustainable designs, methods, and materials under Objectives R13 and R14 through the broadening of the Sustainable Fingal Initiative and through the Council's Circular Cities Action Plan. Circularity principles will be embedded in the Council's Economic Development Strategy which will be published in Q1 2024 and ongoing engagement with business on sustainability and circularity will be facilitated through the establishment of an Economic Forum.
FIN-C629-52	Strengthening communities to support local, reducing the need for packaging while supporting the local economy – this could be achieved by facilitating regular local markets.	The Fingal Food & Drink Policy 2024-2029 will be released in early 2024 and includes a commitment to explore facilitating the connection of local community through avenues such as farmers markets, farm shops, community supported agriculture, food innovation hubs, hospitality, as well as through the growth of allotments, community gardens, kitchen gardens and community kitchens.
		CE Recommendation: No change to draft plan.

Circular Economy and Resource Management		
Public Bins		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-52	FCC should Identify and install segregated public bins in high frequency areas such in and around commercial and gastro areas.	Fingal County Council notes this comment made in relation to segregated public bins. The Council carried out a trial of segregated public bins for recycling. Unfortunately, this trial was unsuccessful due to contamination issues. The Council will continue to promote proper waste segregation practices under action R6 and C5.

FIN-C629-68	Students have observed that there are not enough bins in their local area and not enough recycling bins.	The Council notes this comment made in relation to the deployment of public bins. Fingal County Council currently have deployed its highest number of public bins. As per the litter management plan, litter bin placement will be reviewed prior to new bins being installed. The Council ensures that there are adequate bins in place throughout the County
		CE Recommendation: No change to draft plan.

Circular Economy and Resource Management		
Single Use Items		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-52	Reduction in single use items: proactively support gastronomy sector the moving from single use cups (yes even compostable) to reusable cups to include the initiation of ReUSE initiatives like “to go Cup” or “Vytal” Supporting producers/ food retailers to reduce packaging, move to refillable, and / or move to more sustainable packing.	Fingal County Council notes comments made in relation to single use items. Fingal's Climate Action Section, in collaboration with the Conscious Cup Campaign and Skerries Tidy Towns organised a pilot Reusable Cup Campaign in Skerries in April 2022. Local businesses got together and created a 'We Choose To Reuse' promotional video encouraging their customers to use reusable cups as opposed to disposable cups. The campaign was well received and will be repeated in other locations throughout Fingal over the lifetime of the Climate Action Plan under action C3, develop a calendar of events and awareness days Fingal County Council notes this comment.
FIN-C629-60	The submission suggest that single use plastic should be eliminated, and lessons should be learnt from the Killarney example of eliminating single use coffee cups.	Single use plastic was eliminated from Council canteens under an action in the existing Community Climate Action Plan 2019 – 2024. The use of reusable cups is regularly promoted by the Environmental Awareness Officer and the Climate Action Awareness Office. A pilot project “Skerries Reusable Cup Campaign” was launched in 2022 in collaboration with the Conscious Cup Campaign, Skerries Tidy Town and fourteen local businesses. This pilot will be expanded out to other areas in Fingal under action C3, develop a calendar of events and awareness days.
FIN-C629-52	We welcome (R7) Establish a network of public drinking water fountains to help reduce plastic waste	Fingal County Council notes this comment.

	in partnership with Úisce Eireann and suggest that targeting of prioritised areas be completed in consultation with local groups for maximum impact.	
		CE Recommendation: No change to draft plan.

Circular Economy and Resource Management		
Water Resource Management and the Bioeconomy		
Submission Reference Number	Submission Summary	CE Response
Water Resource Management		
FIN-C629-19	We would request that water demand management (by households, businesses & schools etc) be included in the climate action plan. Water efficiency should mirror existing efforts related to energy and incorporate but not be limited to reduction in demand, water reuse and location of industry in suitable locals to facilitate process water reuse from one industry to another. Can the development of water use efficiency be highlighted as a measure/action in the Plan. Having a greater water use efficiency of potable water will help achieve carbon emission targets as well as protect the natural resource in some areas which may be vulnerable.	Fingal County Council continues to monitor its water usage and encourages staff to promote water conservation. Where possible Fingal County Council continues to identify opportunities to reuse water. The Environment and Climate Action section conducts an environmental awareness work programme delivering messages on water conservation and demand management to schools and the wider public. This work is included under actions R4 'Implement Environmental Management System for Council buildings including reduction in waste and water usage, and increased recycling' and C4 'Utilise various forms of media including FCC social media, FCC website, newsletters, & cinema campaigns to promote climate action awareness'.
FIN-C629-54	Water Butts should be accessible to community groups who would take on watering trees and plants. Accessing water during dry summers is a problem.	Fingal County Council notes comments made in relation to watering solutions. The Council will actively work with communities to investigate opportunities to conserve and manage water. This work will be facilitated under action C1 'Promote and Administer Community Climate Action grants for 2023-2026. Approve grants to communities to deliver climate action projects across the thematic areas as per grant guidelines.'
FIN-C629-51	Local volunteers need support with watering solutions given the challenges of moving significant volumes of water.	

FIN-C629-60	Local volunteers need support with watering solutions given the challenges of moving significant volumes of water.	
FIN-C629-64	The EHS recommends the inclusion of rainwater harvesting (RWH) be included perhaps under nature-based solutions or under the circular economy and resource management.	Fingal County Council notes this comment made by the HSE in relation to rainwater harvesting. This work is accounted for under action F15: Promote and encourage community involvement in the retrofit of SuDS in existing developments, maintaining community rain gardens, discourage hard paving in gardens and retrofit raingardens / water butt installations.
Bioeconomy		
FIN-C629-19	Uisce Éireann are eager to collaborate with others in leveraging circularity opportunities to support the development of a sustainable bioeconomy model.	Noted- Fingal County Council welcomes opportunities to collaborate with Uisce Éireann to support the development of the bioeconomy.
		CE Recommendation: No change to draft plan.

Circular Economy and Resource Management		
Material Sharing/Exchange Programmes		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-56	<p>Green public procurement – we support this approach and would like to work with Fingal to understand what is contained within the strategy so we can understand how we can align our contract requirements with this.</p> <p>R8 and R19 - We would welcome the opportunity to promote circular economy opportunities at the airport more widely within Fingal such as looking at opportunities to share materials we have no use for. Would the council consider supporting the development of a materials sharing scheme between Dublin Airport and local businesses?</p>	<p>The Council has taken the approach of including green procurement criteria within its procurements to promote the purchase of goods and services that cause minimal adverse environmental impact and encourage businesses to develop sustainable business measures. It involves, among other things, selecting suppliers based on environmental criteria such as their products' impacts, their commitment to reducing them, and their compliance with regulations. Green procurement aims to encourage businesses to integrate environmental, social, and governance goals into their procurement and supply chain.</p> <p>The Council will engage with businesses under Objectives R13 and R14 through the broadening of the Sustainable Fingal Initiative and through the Council's Circular Cities Action Plan. Structured engagement with Fingal Chamber and key business stakeholders will be facilitated through the</p>

		<p>establishment of an Economic Forum under the Council's Economic Development Strategy to be published in Q1 2024.</p> <p>The Council is open to engaging with the daa and Dublin Airport to explore opportunities to promote the circular economy and to explore the development of a material sharing programmes between Dublin Airport and the wider business community in Fingal.</p>
FIN-C629-57	Better supporting re-use of requesting materials. E.g., through the development of storage facilities for large quantities of high-quality construction materials for reuse (materials exchange).	The re-use of construction materials is a key element under the EPA Guidance for Resource & Waste Management Plans for Construction & Demolition Projects. The reuse of C&D materials will be assessed and encouraged as part of the planning application process.
		CE Recommendation: No change to draft plan.

Circular Economy and Resource Management		
Integrating Policy and Frameworks		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-52	Respondent states that the included subheadings and their actions in the Circular Economy and Resource Management chapter are confusing in their current presentation and should clearly align to the key measures of a Circular Economy as outlined in the Waste Action Plan for a Circular Economy.	Fingal County Council welcomes comments from Rush Tidy Towns. The Circular Economy and Resource Management theme of the draft Climate Action Plan was prepared with regard for the National Waste Management Plan for a Circular Economy 2024-2030. The draft Climate Action Plan reflects the Council's ambition to support a circular economy through actions R13 and R14 'Prepare and Implement a Circular Cities Action Plan' as well as including a variety of actions that support, waste prevention, reuse and repair schemes such as action R19 'Provide paints, musical instruments and bicycles from Estuary & Coolmine civic amenity centres to community groups for re-use. Identify other used items that could be collected at the Civic Amenity Centres and re-purposed, re-imagined or repaired for re-use.' Fingal County Council will continue to support and promote the implementation of the National Waste Management Plan for a Circular Economy 2024-2030 as outlined in action R6 'Support and promote

		the implementation of the targets of the National Waste Management Plan for a Circular Economy 2024-2030'. The actions included in this chapter appropriately reflect Fingal County Councils support and role in the National Waste Management Plan for a Circular Economy 2024-2030 and its targets.
FIN-C629-52	The submission ascertains that Ireland circularity rate is lower than the European average whilst consumption rates are higher. Ireland's Waste Plan for the circular economy focuses on recycling and waste prevention through design, reuse, repair, and segregation. Fingal must be leaders in this plan.	Fingal County Council welcomes comments from Rush Tidy Towns. Actions included in the draft climate action plan and the work programme of the Environmental Awareness Officer reflects the Councils ambition to support the waste action plan for a circular economy. Fingal County Council are signatories of the Circular Cities declaration and are committed to this work under action R13 and R14. The Council provides infrastructure to support recycling through our network of bring banks and civic amenity sites. Under actions R17, R18 and R19 the Council will continue to identify opportunities to re-purpose or repair items as well as increase the infrastructure available to the public to facilitate proper waste segregation and management.
		CE Recommendation: No change to draft plan.

4.12 Submissions on Section 5 Community Engagement

Community Engagement		
Engagement and Collaboration with Stakeholders		
Submission Reference Number	Submission Summary	CE Response
Engaging with Communities		
FIN-C629-18	This submission welcomes the inclusion of the Community Engagement theme in the CAP. The submission recognises the work done as part of the public consultation process and suggest that the Council could make greater effort to consult with marginalised communities in a more direct way.	<p>An extensive consultation process on the draft CAP was undertaken which was widely promoted through social media, through the PPN and other networks.</p> <p>The Council held three public consultation evening events and two library events throughout the consultation process over the six-and-a-half-week consultation period. Copies of the draft plan, SEA and AA were available in 10 libraries. Posters on the draft plan and the public consultation process were displayed in the libraries, in County Hall, Swords and in Civics Offices, Blanchardstown. A summary video was also developed to provide an overview of the plan to the public. The Council recognise the importance of a just transition and the inclusion of all communities in taking climate action. The inclusion of the community engagement chapter and associated actions of this draft Plan will help to ensure the engagement with a variety of communities on climate action. The Council will work through the PPN and community section.</p>
FIN-C629-52	The submission suggest that the creation and facilitation of an exchange localised and Fingal Wide network would further strengthen the impact of community groups.	The Council recognises the importance of facilitating networking between volunteer groups in relation to climate action projects. The Environmental and Climate Awareness sections work with the PPN, Tidy Towns and other groups through a variety of work programmes. The introduction of the Community Climate Action Fund under action C1 will further assist groups in collaborating and networking with the support of the Fingal Community Climate Action Officer.
FIN-C629-72	The submission suggests that Action C11 should be expanded to include other community groups.	Action C11 is a pilot action to develop climate action workshops with the Tidy Towns Groups in order to develop a blueprint for delivering this type of

		training. If successful it can be rolled out to other groups within Fingal that wish to avail of it.
Engaging with Businesses		
FIN-C629-55	We encourage Fingal County Council to actively engage with local businesses, community groups and other stakeholders throughout the plan's implementation. Fingal Chamber is committed to working with Fingal County Council to support engagement with the business community in the region.	The Economic Development Section will engage with businesses and Fingal Chamber on sustainable business practices to identify and raise awareness of good practices under actions R13 and R14 through the broadening of the Sustainable Fingal Initiative and through the Council's Circular Cities Action Plan. Structured engagement with Fingal Chamber and key business stakeholders will be facilitated through the establishment of an Economic Forum under the Council's Economic Development Strategy to be published in Q1 2024.
FIN-C629-55	The Climate Action Plan should include further initiatives that promote sustainable business practices, such as energy efficiency, waste reduction, and responsible sourcing. Fingal County Council should offer incentives to businesses, reward and recognise sustainable behaviours and initiatives that can be held up as excellent examples. These efforts can drive innovation in our local economy.	
FIN-C629-71	More engagement with the business community on the plan and they critical role they play in the climate fight.	
FIN-C629-66	Incentives for climate-friendly businesses and local entrepreneurs with green business models would achieve similar results. One-stop-shops in Dublin City council offices could help businesses identify opportunities available to them.	The Economic Development Section will engage with businesses under actions R13 and R14 through the broadening of the Sustainable Fingal Initiative and through the Council's Circular Cities Action Plan. Structured engagement with Fingal Chamber and key business stakeholders will be facilitated through the establishment of an Economic Forum under the Council's Economic Development Strategy to be published in Q1 2024. The Council will engage with businesses on sustainable/green business practices to identify and raise awareness of good practices, potential funding opportunities for the implementation of green/sustainable measures, green procurement as a green transition tool and its implications for business and the opportunities and challenges for businesses of Environmental Social Governance (ESG) and the introduction of new

		requirements from 2024 onwards under the Corporate & Social Responsibility Directive (CSRD) arising from the EU Green Deal.
FIN-C629-56	The submission supports the community engagement theme in the CAP. The submission would welcome the opportunity to be involved with initiatives that develop green skills. The submission would welcome the opportunity to collaborate to deliver programs that support climate action and infrastructural development such as solar and wind farms.	Comments noted.
Engaging with Schools		
FIN-C629-54	Action C8: Green Schools is an excellent way of developing Climate Action Initiatives and education. Examine how the Green Schools coordinator in each school is resourced. This person is key. Is it a paid post of responsibility or a voluntary position? Resources should be used to attract committed personnel to these roles.	The Green Schools programme is facilitated locally by Fingal County Council staff, in conjunction with An Taisce. The Green Schools Coordinator position is voluntary and often is chosen by the school principal or self-nominated by a teacher. Fingal County Council gives prize payments of €300 per school upon award of new Green Flags. Fingal County Council's Environmental Awareness Section supports numerous schools every year with funding for projects as requested by schools. Additionally, action C8 will provide resources including funding to schools to support projects including composting in schools, gardening and vegetable growing projects, resource packs and installation of water butts.

FIN-C629-70	The submission suggests that the Council should liaise with schools and the Department of Education to include projects in the Curriculum	<p>The development of a climate action curriculum for schools is the responsibility of the Department of Education. A number of actions under the Community Engagement theme of the draft Plan focus on schools. The Environmental and Climate Awareness sections as well as the Cycling and Walking Officers in the Active Travel section actively work with schools in Fingal to encourage climate action.</p> <p>Actions C6-C8 focus on the Councils work with schools and range from developing climate action programmes, supporting schools taking part in the Green Schools programme as well as providing funding and resources to schools. Action C6 will engage the four Dublin Local Authorities in developing a climate action program that can be delivered to secondary schools. The An Taisce Green flag program engages with schools throughout Fingal as does the GAA Green Club. The Council will continue to support schools and facilitate this work under the Community Engagement Section of the plan 'Climate Awareness in Schools' over the lifetime of the plan.</p>
		CE Recommendation: No change to draft plan.

Community Engagement		
Awareness Raising and Education		
Submission Reference Number	Submission Summary	CE Response
Conservation & Land Management		
FIN-C629-51	Please consider hosting World Sand Dune Day in Balbriggan as there is currently a campaign to remove marram grass from Balbriggan Front Beach	The Council commits to running a variety of awareness events in relation to climate action under the action C3, 'Develop an annual calendar of climate action & environmental awareness days of significance which will include international and national days, such as the World Earth Day, World Sand Dune Day, National Reuse Month, National Bike Week, Dublin Climate Action Week, All Dublin Clean up week. Targeted campaigns to promote activities as per calendar timeline'. The Climate Awareness section of the Council will continue to monitor and review the success of events and will appropriately consider locations for events as part of the annual work plan of the section.
FIN-C629-51	Please include an action on communicating land management changes effectively to local communities as an education and awareness opportunity is currently being missed. Publicly owned land must be managed for the greater public good.	The draft Plan includes action F15 and several awareness raising actions. F15 Promote and encourage community involvement in the retrofit of SuDS in existing developments, maintaining community rain gardens, discourage hard paving in gardens and retrofit raingardens / water butt installations.
Communications and Awareness Programmes		
FIN-C629-52	The submission suggests that the Climate Action Plan would be strengthened if barriers to change and the extent to which change is already happening is highlighted with the public.	Considerable work is already done in these areas through the various work programs in the ECCAT's Department. Signposting of this work and various initiatives will be reviewed with a view to better inform the public of the work being undertaken and focusing on clear messaging under action C4.
FIN-C629-52	The submission suggest that effective, clear and appropriate communication is required.	The Council notes the importance of communications, actions C3, C4 and C5 focus on improving communications and information available to the public about climate action. Reviewing the communication mechanisms

		within the FCC Environment Climate Action and Active Travel Department is part of the above actions.
FIN-C629-64	The EHS recommends that the ambition in Community Engagement go beyond awareness raising but extend to changes in behaviour and sustainability of behaviour among stakeholders including businesses and communities. Progress can only be measured by assessing not only knowledge but practice.	Fingal County Council notes this comment made by the HSE. The Council understands the importance of enabling factors to assist in empowering and implementing behavioural change. The Council is focusing on a range of enabling services such as supporting SEC's, the provision of active travel measures and the safe routes to school programme, facilitating the provision of the EVCP, the provision of civic amenity centres and bring banks, the provision of funding through the Community Climate Action Fund, the development of education material and support for SMEs through the LEO office. These examples are supported throughout the draft plan through a variety of actions.
FIN-C629-66	With 60% of young people surveyed expressing high levels of climate anxiety, there is a need to introduce local initiatives to tackle this, the most important of which is a bottom-up approach to climate action at local level. One way to implement this would be by introducing a Climate Ambassador Programme, wherein locals who have undergone climate renovations in their homes would be connected with other members of the community to talk about the process from a non-expert perspective.	The Council notes the importance of community engagement when taking climate action. The Council actively work with a variety of community groups and young people to support climate action. Action C1 will both assist groups in taking action financially, but it will also assist with networking and idea sharing. Action C2-C5 commits to running events, developing resources and increasing communications in relation to climate action. The Climate Action section of the Council work in partnership with the An Taisce Climate Ambassador programme run by An Taisce and will continue to support young people in taking climate action.
FIN-C629-68	The submission suggests that the biggest stakeholders in the transition to a "climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy" are today's primary and secondary school students. The submission suggests that this group will be disproportionately affected by the consequences of climate change. The submission suggest that the citizens of Fingal need a blueprint of the kind of sustainable	The Community Engagement theme outlines a number of actions that involve climate action training and awareness. Specifically focusing on young people and school students are actions C6, C7 and C13. Action C6 will work with the other Dublin Local Authorities to develop a training program on Climate Action for secondary schools to bridge the gap until the launch of climate action as a subject in schools. Action C2, along with action C3 will deliver a series of events and webinars on climate action in collaboration with the work program of the Environmental Awareness Officer.

	economy that we are working towards. The submission queries what Just Transition will look like and can a promotional video be produced.	A video explaining climate change and action will be developed as part of action C5.
FIN-C629-68	The submission suggest that place-based education is the key to climate action. The submission suggests that citizens young and old are perplexed by climate action jargon and suggest that clear and structured information would go a long way in engaging communities.	The Council appreciates that jargon around climate action can be daunting and perplexing. To assist with this the Council has a series of actions within the Community Engagement chapter to assist with improving climate literacy and raising awareness. Action C6 in conjunction with the other DLAs proposes to develop climate action awareness in schools. Action C3 commits to developing a calendar of awareness events that promote climate action. The Council runs a series of events throughout the year available to the public to increase awareness including Climate Action Week and Bike Week. Action C5 proposes to develop a library of material including webinars, books, articles and digital training resources covering climate science, climate action, just transition, the LACAP, National and Local climate action plans that will be made available to the public through Fingal's social media and libraries.
FIN-C629-71	It's increasingly important that the council is clear about the behaviour change it is trying to achieve, in particular in relation to active travel, and clearly communicates that to the community. Perhaps 'behaviour change plans' with specific aims and missions. When people say the council wants to get us out of cars it would be good to be able to say well according to the plan the council wants to X amount of people here out of cars but maintain road space for those who need it.	The provision of new cycling and walking infrastructure is always accompanied by a detailed communications plan. Such communication plans span the project lifecycle from pre-consultation through statutory and non-statutory consultation to project launch and post launch promotion. Separately, and in a manner which complements this work, Fingal County Council promote the adoption and increased use of active modes of travel. Fingal County Council has engaged the ESRI to provide recommendations on key behavioural change techniques which can be employed to aid in the shift to Active Travel and these recommendations are taken into consideration when drafting all communications plans. It should be noted that Fingal County Council also locally amplify government awareness and education campaigns in the region such as 'Your Journey Counts' (2023). Such campaigns can achieve far higher public notice and effectiveness due to the frequency of their appearance in national media. A county-wide communications campaign to promote adoption of Active Travel is planned for 2024 with the aim of improving public awareness and understanding of

		the future network currently being planned and built throughout Fingal, by demonstrating how single projects sit within the overall map.
FIN-C629-71	Well publicised events and engagement programmes for the climate action plan 'Pop Up Shops' for key projects such as retrofitting and circular hubs	This will be achieved through the implementation of actions C2, C3, C4, C9-18
FIN-C629-57	IGBC suggests the Councils set up one stop shops for physical information centre on energy renovations and funding available.	This will be considered through the implementation of actions in the community engagement theme. The Council will provide an energy awareness event annually in partnership with SEAI, CODEMA and other stakeholders through action C9. Additionally, the Council will support the Better Energy Communities and Sustainable Energy Communities through action C10.
FIN-C629-39	This submission suggest that action C3 may benefit from the experiences of Killarney's reusable cup initiative. The submission suggests that following on from the use of the Home Energy Kit, it may be useful to develop an awareness campaign around only using as much water as you need.	The events listed in action C3 are a sample of the climate action events that will be delivered during the year and not the whole program, which will include many other events. Delivering a reusable cup campaign will be included in the calendar of events. In 2022, the Council ran a reusable cup pilot with Skerries Tidy Towns and fourteen local businesses. It is intended to further roll out this campaign under action C3. The Climate Action Awareness Officer will be developing under action C4 and C5, supports and resources which will be available to members of the public and advise on climate action measures. The Council also runs an annual cinema media campaign promoting climate actions.
Staff Training		
FIN-C629-57	Fingal CoCo should: Increase inhouse expertise through training in carbon literacy, circularity and green public procurement to support implementation the decarbonisation of the built environment. Training programmes should cover Whole Life Carbon (WLC) requirement, LCA, low carbon construction and renovation, as well as policy tools and procurement of low carbon products and circular use of	Fingal County Council will continue their upskilling programmes including CPD, training and increasing in-house expertise as suggested. This work is accounted for under actions C22 'Provide Climate Awareness training for all staff and elected members and identify opportunities to embed climate awareness across all Departments and action C23 'Develop climate action induction pack for all new staff'. The Council continue to work in partnership with the Climate Action Regional Office (CARO) and the Local Authority Services National Training Group (LASNTG) who have ran a climate action training programme for local authority Councillors. The

	buildings and materials. Run awareness level training on climate policies, WLC, low carbon solutions and the circular economy for local Councillor.	Council will continue to engage with these organisations under action C22 and C23.
		CE Recommendation: No change to draft plan.

Community Engagement		
Community Gardens/Allotments		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-18	We wish to highlight the many benefits of community gardens, including the 'GLAS @ TU Dublin' garden supported by Fingal County Council in Blanchardstown/Corduff. There is a wealth of evidence from academic studies that such green urban spaces have many benefits, not only in terms of food production, health and biodiversity, but also in relation to social inclusion, solidarity, and mental health. We would welcome a more explicit emphasis on the reasons why Fingal County Council will support allotments and community gardens.	There is no doubt of the social benefits of a community garden in terms of awareness of food production, health and biodiversity and social inclusion. The Environmental Awareness work programme supports awareness of community gardens. The draft Plan includes action N16: Continue supporting the use of public allotments as a way communities can grow their own food, and lower food miles and food waste. The Council currently provides 4 allotments sites across the County. In addition, we support a number of community gardens and will continue where requests are received to work with promoters to develop community gardens in suitable locations.
FIN-C629-28	We need much greater investment in community gardens and allotments. I've been trying to get one for ages and it's much harder than it should be! It seems to me that the demand far outweighs the offer.	
FIN-C629-32	There are many benefits of community gardens, including the 'GLAS @ TU Dublin' garden supported by Fingal County Council in Blanchardstown/Corduff. There is a wealth of evidence from academic studies that such green urban spaces have many benefits, not	

	<p>only in terms of food production, health and biodiversity, but also in relation to social inclusion, solidarity, and mental health.</p> <p>I would therefore welcome additional allotment sites and community gardens in Fingal or the expansion of existing allotments to meet the needs of the residents of Fingal.</p>	
FIN-C629-44	Fingal County Council to commit to performing a review of idle, vacant and derelict land within Fingal County Council that could be used for community growing purposes.	
FIN-C629-60	Add community gardens to the action plan - Develop a community garden in every town. This is a really important space for the community for learning, sharing and caring for our community. Great potential for a base for promoting food sustainability, circular economy. The community would learn new skills and how to grow, harvest and eat their own food which is good for both mental and physical health. People can learn about the seasonality of food and be encouraged to grow their own food at home alongside the community garden food.	
FIN-C629-44	Fingal County Council to commit to preserving existing allotments and community gardens provided and increasing the number of allotments and community gardens provided over the lifetime of the Climate Action Plan. The KPI for this will be the number of allotments and community gardens in Fingal County Council.	
FIN-C629-48	We as a rural village are in desperate need of the development of a large community garden which includes a river walkway (cycle path) which has	Ballyboughal village is zoned as RV – Rural Village in the Fingal Development Plan 2023 – 2029. This zoning objective permits a wide range of development including the provision of community space. Objective

	already been lying in our LAP for many years and never developed. We have no outdoor space for community gatherings. We also have no indoor community centre either and feel it necessary to insist that engagement in this matter under this Fingal climate action plan.	CIOSO9 of the Development Plan seeks to provide a new Community Hall to serve the needs of the people of the village of Ballyboughal.
FIN-C629-44	Fingal County Council to recognise National Allotments and Community Gardens Week by celebrating the role of community growing within communities throughout Fingal County Council during this week each year.	The Council commits to running a variety of awareness events in relation to climate action under the action C3, 'Develop an annual calendar of climate action & environmental awareness days of significance which will include international and national days, such as the World Earth Day, World Sand Dune Day, National Reuse Month, National Bike Week, Dublin Climate Action Week, All Dublin Clean up week. Targeted campaigns to promote activities as per calendar timeline'. The Climate Awareness section of the Council will continue to monitor and review the success of events and will appropriately consider events as part of the annual work plan of the section.
FIN-C629-44	Add allotments to section C14	Allotments are addressed under the Nature Based Solutions theme and specifically under Action N16
FIN-C629-44	Respondent states they want Fingal County Council to commit to opening and supporting a seed library, similar to the one established within Wicklow County Council and in Hollyhill Library in Cork City.	The Council will consider this request under the biodiversity plan.
FIN-C629-51	Action N16: Please include community gardens in this action.	The Council accepts the proposed amendment. N16 will now read: 'Continue supporting the use of public allotments and community gardens as a way for communities to grow their own food, and lower food miles and food waste.'
FIN-C629-44	Action N16: Add Community Gardens to this action.	
		CE Recommendation: It is recommended that the following action is amended. Action N16 will be reworded as follows: Continue supporting the use of public allotments and community gardens as a way for communities to grow their own food, and lower food miles and food waste.

Community Engagement		
Funding and Resources		
Submission Reference Number	Submission Summary	CE Response
Funding		
FIN-C629-51	Consider using the Community Climate Action Fund to fund social enterprises in addition to purely volunteer-led initiatives as many volunteer groups are at or reaching capacity.	The Community Climate Action Fund will support social enterprises and community initiatives as per the Department guidelines.
FIN-C629-60	Action C10: The Community Climate Action Fund could also support SECs to implement local projects.	Strand 1 of the Climate Action Fund supports “Building Low Carbon Communities”. SECs can apply for funding as long as the project they are proposing meets the criteria for the fund. The Council also has a separate process to facilitate funding for SECs to complete their Energy Master Plan.
FIN-C629-51	We would like an action on funding community-led renewable energy projects. The NISA Community Benefit Fund should exclusively support decarbonisation projects.	As part of the Community Climate Action Programme, Fingal County Council will be administering the Community Climate Action Fund. This fund aims to assist in building low carbon communities and will support projects under the theme’s community and energy projects, travel, food and waste, shopping and recycling and local climate and environmental action. Fingal County Council has recently appointed a Community Climate Action Officer to guide and support communities in completing climate action projects funded under the Community Climate Action Fund. This work is supported in the Draft Climate Action Plan under the C1: Promote & Administer Community Climate Action grants for 2023 - 2026. Approve grants to communities to deliver climate action projects across the thematic areas as per Grant guidelines. Regarding the NISA Community Benefit Fund– a Community Benefit Fund committee will be put in place by an Independent Fund Administrator.
FIN-C629-52	Funding mechanisms (Community Climate Action grants, LEADER Projects, Sport Grants etc) mentioned in this section are extremely important to local climate action projects and we welcome their continuation.	Fingal County Council notes and agrees with this comment.

Empowerment and Infrastructure		
FIN-C629-16	Respondent notes that's actions within the plan focus on education and awareness but feels that these are not sufficient for action and that people require facilities/infrastructure to be empowered to affect change.	The draft Plan includes awareness raising actions and actions which will provide the enabling behavioural change infrastructure. Additionally, members of the public will be supported by the Community Climate Action Officer and Fingal County Council to facilitate citizen empowerment and climate action. This work will be facilitated through the Community Climate Action Fund (CCAF) and an environmental and climate awareness programme of works. These programmes will help support and build low carbon communities. Additional supporting actions include C2: Deliver Climate Action Week program of events in conjunction with DLA C4: Utilise various forms of media including FCC social media, FCC website, newsletters, & cinema campaigns to promote climate action awareness. C5: Develop a library of climate material including webinars, books, articles and digital training resources covering Climate Science, Climate Action, Just Transition, the LACAP, National and Local Climate Action Plans and make available to the public through the Fingal's social media channels and Fingal Libraries. C1: Pilot Climate Action workshops with Tidy Town committees to promote awareness of climate action at a local level.
FIN-C629-36	The respondent states that as a community they require a clear understanding of the benefits of climate action. The respondent states that having a space or hub within their community would facilitate learning and engagement regarding climate action. The respondent also states that this hub would also bring additional co-benefits to establishing such a space.	The Council notes this comment and agrees that engagement is a key aspect to climate action. The Council will continue to invest in outdoor space for all to use. The Council provide a variety of spaces that are open to the public to use for networking, facilitating workshops or running events such as our community centres and libraries. The Council's Environmental and Climate Awareness sections will continue to engage with a variety of communities about climate action through events, workshops and sharing educational material. This work will be facilitated under action C1, C2, C3, C5, C11 and C12.
FIN-C629-72	While we welcome all the actions included here, we feel that specific targets and goals are needed. The current efforts mainly revolve around educating and raising awareness, which are essential steps. However, it's not just about knowing; it's also about	The draft Plan includes awareness raising actions and actions which will provide the enabling behavioural change infrastructure. Additionally, members of the public will be supported by the Community Climate Action Officer and Fingal County Council to facilitate citizen empowerment and climate action. This work will be facilitated through the Community Climate

	<p>having the tools and infrastructure to make a real impact. Citizen empowerment is a key theme in Ireland's Climate Action Plan 2023 https://www.gov.ie/en/publication/7bd8c-climate-action-plan-2023/, it involves not only informing but also providing the resources and opportunities for people to take action. It's not just understanding the need for change; it's also about giving individuals the means and skills to drive that change in their communities and beyond. More empowerment actions should be included in our plan. For example, we have proposed additional actions under the "Circular Economy and Resource Management" theme, such as the provision/expansion of community repair and recycling spaces, to enable behavioural change.</p>	<p>Action Fund (CCAF) and an environmental and climate awareness programme of works. These programmes will help support and build low carbon communities. Additional supporting actions include C2: Deliver Climate Action Week program of events in conjunction with DLA C4: Utilise various forms of media including FCC social media, FCC website, newsletters, & cinema campaigns to promote climate action awareness. C5: Develop a library of climate material including webinars, books, articles and digital training resources covering Climate Science, Climate Action, Just Transition, the LACAP, National and Local Climate Action Plans and make available to the public through the Fingal's social media channels and Fingal Libraries. C1: Pilot Climate Action workshops with Tidy Town committees to promote awareness of climate action at a local level. There is no provision for the Council to provide community repair and recycling spaces, however, community groups could apply for to the Climate Action Fund to provide these through local partnerships.</p>
		<p>CE Recommendation: No change to draft plan.</p>

Community Engagement		
Understanding Climate Change		
Submission Reference Number	Submission Summary	CE Response
Climate Literacy		
FIN-C629-64	Engage with communities to deliver “climate literacy” to build hope that we can do something (helping to combat climate anxiety) and to build resilience in our people in tandem with building resilient infrastructure.	Fingal County Council welcomes the HSE's submission in relation to climate literacy. Action C5 'Develop a library of climate material including webinars, books, articles and digital training resources covering climate science, climate action, just transition, the LACAP, National and Local Climate Action Plans and make available to the public through Fingal's social media channels and Fingal libraries'. This action will provide communities with practical resources that will enhance climate literacy and enable them to take climate action. Action C1 'Promote & Administer Community Climate Action grants for 2023 - 2026. Approve grants to communities to deliver climate action projects across the thematic areas as per Grant guidelines will further facilitate communities to take action.
FIN-C629-64	Suggested Example Action: Citizen engagement – a plan that contributes to delivering “climate literacy” and enables citizens to take action to improve the quality of life for themselves and fellow citizens.	
Barriers to Climate Action		
FIN-C629-52	Community engagement should also focus on understanding barriers to taking action, to understanding what matters most to people, to understanding what is working for people and what is not working, to understand what motivates people, and to actively engage with the community to identify what matters to communities in relation to climate action and climate resilience – now and in the future.	Fingal County Council welcomes the submission from Rush Tidy Towns regarding the barriers faced by the public trying to tackle climate change. Fingal County Council provides a range of resources through an awareness programme that empowers communities and individuals to take climate action, with an aim to mitigate barriers that may impede some individuals from engaging in such initiatives. Action C1 'Promote and Administer Community Climate Action Grants for 2023-2026. Approve grants to communities to deliver climate action projects across the thematic areas as per grant guidelines' this action will provide communities with the resources and infrastructure to take climate action. Fingal County Council has appointed a Community Climate Action Officer to support groups in taking climate action locally with the support of these funds. Action C5 'Develop a library of climate material including webinars, books, articles, digital training resources covering climate science, climate action, just

		transition, the LACAP, national and local climate action plans and make available to the public through the Fingal social media channels and Fingal libraries'. This action will contribute to elevating awareness around climate action, delivering accurate information to the public, facilitating their understanding of climate change and guiding individuals on practical actions they can integrate into their daily lives. Action C2 'Deliver Climate Action Week program of events in conjunction with DLA' will offer a diverse range of events, workshops and educational talks accessible to the public, aimed at enhancing awareness of climate change and enabling individuals to take meaningful action.
		CE Recommendation: No change to draft plan.

Community Engagement		
Climate Proofing		
Submission Reference Number	Submission Summary	CE Response
Grant Agreements		
FIN-C629-51	Action C18: Tie sport grants to club policy, such as the use of reusable water bottles only	The draft Plan includes action C18: Sport Grants - Clubs must provide evidence of 'circular economy' and other sustainable initiatives as appropriate. The Council is also considering a new scheme which will include a climate action section.
FIN-C629-60	Action C18: Tie sport grants to club policy, such as the use of reusable water bottles only	The draft Plan includes action C18: Sport Grants - Clubs must provide evidence of 'circular economy' and other sustainable initiatives as appropriate. The Council is also considering a new scheme which will include a climate action section.
FIN-C629-72	Climate-proofing Community Grants and Business support grants - We recommend an action for the Council to ensure that our grants support the decarbonisation transition rather than going against it, including making the expertise available to advise in development of grant applications.	Climate action is being mainstreamed throughout all Council activities and appropriate text will be included in Community Grant applications.

Integrating Policy and Plans		
FIN-C629-51	Action C5: Integrate Local Climate Action Plans with Biodiversity and Circular Economy Plans	Fingal County Council notes this comment. The draft Climate Action Plan has been prepared having regard to the Plans mentioned. Actions outlined in the 'Nature Based Solutions', 'The Circular Economy and Resource Management' and 'Community Engagement' sections support these plans.
FIN-C629-60	Integrate Local Climate Action Plans with Biodiversity and Circular Economy Plans	
		CE Recommendation: No change to the draft Plan.

4.13 Submissions on Section 6 Decarbonising Zone

Decarbonising Zone		
Communications and Engagement		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-51	An effective communication strategy will be central to successful implementation of the decarbonisation zone. A quality, universally accessible online platform, public meetings and local hub will be necessary to build trust and widespread community support. A community garden and café hub would provide a more informal, collaborative setting.	This draft CAP has identified a Register of Opportunities for the Balbriggan DZ. The next step is to co-create a localised decarbonisation zone implementation plan. This will be done in consultation with the local community, and local stakeholders and an effective DZ communication strategy will be central to this. A Climate Action, Biodiversity and Sustainability Pillar under the Our Balbriggan town rejuvenation project will be considered as part of this implementation plan.
FIN-C629-50	A Climate Action, Biodiversity and Sustainability Pillar under the Our Balbriggan town rejuvenation project would help with delivery of actions under the Decarbonising Zone initiative and would facilitate “early and continued engagement of stakeholders”. An effective communication strategy will be central to successful implementation of the Decarbonising Zone... Identify EU and other Grants for Solar/Retrofits and Community Power projects for DZ on top of SEAI grant funding Fund the SEC’s and other organizations beyond SEAI for building retrofits and community-led renewable energy projects	
FIN-C629-51	A Climate Action, Biodiversity and Sustainability Pillar under the Our Balbriggan town rejuvenation project would help with delivery of actions under the Decarbonising Zone initiative and would facilitate	

	<p>“early and continued engagement of stakeholders”... The transition will be very challenging and a heavy focus on benefits to the local community will be important.</p>	
FIN-C629-54	<p>We are delighted that Balbriggan has been selected as the Fingal Decarbonising Zone. An effective communication strategy will be central to successful implementation of the decarbonisation zone.... A Climate Action, Biodiversity and Sustainability Pillar under the Our Balbriggan town rejuvenation project would help with delivery of actions under the Decarbonising Zone initiative and would facilitate “early and continued engagement of stakeholders”.</p>	
FIN-C629-16	<p>Sustainable Skerries looks forward to learning from this pilot.</p> <p>We request that regular updates on progress and learnings be made publicly available.</p>	<p>Progress made on the Decarbonising Zone will be included in the annual progress report of the Fingal Climate Action Plan 2024-2029. This progress report will be made available to the public.</p>
FIN-C629-52	<p>It is important that a transparent, participative approach to the DZ is adapted.</p> <p>Robust monitoring of all actions and activities is critical for potential upscaling of this project and should be shared regularly to inform other ongoing activities within the overall Climate action plan.</p> <p>As the DZ will be working closely with the wider community, it presents itself as a perfect area to better understand the obstacles and successes of a community engagement strategy as presented under “community engagement”</p>	
FIN-C629-62	<p>It is recommended to add a new pillar to the Our Balbriggan project that is focused on the</p>	<p>As part of the midterm review of the Our Balbriggan Rejuvenation Plan, the establishment of a new Climate Action, Environment and sustainability pillar group is being considered. The review will progress in 2024.</p>

	decarbonising zone, sustainable energy and biodiversity.	
FIN-C629-60	Education is key in implementing this.	Comment noted. The Decarbonising Zone Action and Implementation strategy will begin development in 2024 and this comment will be considered.
FIN-C629-50	Balbriggan Sustainable Energy Community CLG welcomes the enhanced ambition of the Fingal County Council Draft Climate Action Plan 2024-2029 and the designation of Balbriggan as the Fingal Decarbonising Zone.	Noted- Fingal County Council is supporting the SEC programme through Codema as regional coordinator and by supporting the SEC mentors. The Council looks forward to engaging with stakeholders during the development of the implementation and action strategy for the Decarbonising Zone in 2024.
		CE Recommendation: No change to draft plan.

Decarbonising Zone		
Heat Pumps		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-2	I don't understand the claim on p. 113 of the report that only houses in a certain area are "suitable" for heat pumps, without additional insulation or energy efficiency measures. Can you please clarify what "suitability" means in this case? Heat pumps are up to 400% as efficient as boilers, and whether or not a house is already well insulated has no bearing on that thermodynamic efficiency. We should be deploying heat pumps, and insulating homes, at the same time - there's no need to suggest a dependence here.	With regards to energy efficient buildings and heat pump efficiency, the efficiency of heat pumps (HP) varies depending on the difference in temperature between the source (the outdoor air) and the sink (the flow temperature in your radiators, hot water cylinder). The greater this difference the less efficient your heat pump will be. When buildings are less efficient, they leak heat faster through poorly insulated fabric or poor air tightness. In order to be able to replace this heat at a fast enough rate you have two main options - either increasing the size of the heat emitters (e.g., larger radiators or underfloor heating) or increasing the flow temperature. If the size of the emitters is kept the same, then the flow temperature will need to be kept at a higher level to maintain the comfort in the building which leads to reduced efficiency but also in the case of heat pumps the need for larger heat pumps which are more expensive. For

		<p>these reasons it is important to look at the heat loss of a building when considering its suitability for heat pumps.</p> <p>One of the main constraints to the adoption of individual building-level heat pumps is the requirement to have a sufficiently energy efficient building that allows the heat pump to supply adequate heat (enough to keep the building at a comfortable temperature) without detrimental effects to the HP's efficiency.</p> <p>The metric used to assess a building's suitability for heat pumps is known as the Heat Loss Index (HLI). In order for a residential dwelling to be deemed suitable, it requires a HLI of 2 W/K.m² floor area or less. The HLI can be defined as the total heat loss (fabric and ventilation losses), more on this can be found in SEAI's Technical Assessment Process for Heat Pump System Grants https://www.seai.ie/publications/Technical_Advisor_Role.pdf</p>
		CE Recommendation: No change to draft plan.

Decarbonising Zone		
Industries		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-5	There is no mention of the fact that industries located in Fingal could adversely affect the achieving of the national de-carbonising policy through their demand for electricity generated elsewhere using polluting technology. The Balbriggan Decarbonising Zone needs to be re-imagined and upscaled. On page 109 under "Role of Fingal Council" there is no mention of Fingal acting in accordance with national aims and obligations to de-carbonise.	Emissions from industry have been considered in the baseline emissions as per Codema's analysis. Reducing emissions in the industrial sector will require a combination of energy use reduction and moving away from fossil fuels to renewable energy. There are actions in the National CAP 2023 to improve the renewable share of the energy mix on the national grid. The whole thrust of the draft CAP is to translate national policy to a local level and the concept of the DZ is in keeping with this.
		CE Recommendation: No change to draft plan.

Decarbonising Zone		
Other		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-50	We are happy to see that a Green Public Procurement strategy is being developed. Looking at the timelines, a Decarbonising Zone strategy in procurement would need to be done sooner than the Fingal Wide Strategy. Specifically prioritize the DZ in the procurement strategy	The Councils Green Public Procurement (GPP) strategy has been scheduled as one of the lead actions under the draft CAP.
FIN-C629-50	We need an Active Travel strategy that meets DZ requirements, including Mobility Hubs for every estate as a requirement for planning permissions for housing to meeting the targets below.	The draft CAP has identified a Register of Opportunities for the Balbriggan DZ. The next step is to co-create a localised Decarbonisation Zone Implementation Plan. Active travel measures will be considered in this phase and a draft Active Travel plan for the town is already in development.
FIN-C629-57	The Chapter on Decarbonising Zone is very comprehensive and detailed, but if the objective is to test and perfect ideas to reduce our carbon emissions by 51% by 2030, it needs to be more ambitious. More specifically, it should address all the emissions associated with the built environment across its whole life cycle, as well as NBSs. It should cover operational emissions, as well as embodied and transport emissions (taking an avoid-shift-improve approach). For instance, ambitious projects to address dereliction, vacancy and under-used buildings could be considered....	The draft CAP has identified a Register of Opportunities for the Balbriggan DZ. The next step is to co-create a localised Decarbonisation Zone Implementation Plan. This will be done in consultation with the local community, and local stakeholders. These suggestions will be considered within this phase.
		CE Recommendation: No change to draft plan.

4.14 Submissions on Section 7 Implementation and Reporting

Implementing and Reporting		
Tracking measures, monitoring, and reporting		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-72	<p>The Fingal Green Councillors believe that transparent tracking and monitoring of progress on agreed actions are of paramount importance. The reporting framework outlined on page 124 of the draft plan and the inclusion of tracking measures in the tables of actions in Section 5 are positive steps. However, measuring actions alone is insufficient and as previously mentioned in our submission, we believe that all actions should be assessed under the S.M.A.R.T methodology. This will mean that actions within the Climate Action Plan will have specific targets that will need to be established, and their expected impacts need to be assessed.</p>	<p>The actions in the draft Plan have been developed using the SMART approach.</p> <p>Section 7 of the draft Plan describes the approach to Implementing and Reporting on the draft CAP.</p> <p>Under the draft Plan the Council intends to reduce greenhouse gas emissions from across its own assets and infrastructure in line with its public sector targets, while also taking on a broader role of influencing and facilitating communities to reduce emissions within the local authority area, in support of the national climate objective and national targets. The Council will report on all CAP actions annually and will closely monitor and report on its own energy efficiencies and GHG emissions and report to the SEAI as required. CAP action tracking measures will track the Councils performance in related to the action stated. The Council's Energy Management Team and Codema are working to identify the optimal pathway and pipeline of projects to achieve the Councils 2030 targets. This work is well advanced. The Council is not required to report on the GHG emission reductions for the wider community – this is a role for government under the National CAP.</p>

<p>The “timeframe” heading for the tables of actions lacks clarity. Action E26 should be capable of completion before 2028. Action E27 Install PV panels on libraries etc. is given a timeframe of 2028. Analysis for this installation has already started; this information should be included in the plan.</p> <p>To ensure effective progress tracking, it is crucial to introduce “red/amber/green” traffic light-type status reporting for each action, indicating whether it is on track, at risk, or facing significant issues. Furthermore, actions must be weighted according to their impact, enabling progress reporting to quantifiably reflect mitigation progress or adaptation progress. Reporting the percentage of actions progressed lacks meaning without assessing their impact against targets. We propose the addition of a “Yearly target range” column in the summary action tables to address this concern. Assessing Key Performance Indicators and ensuring robust oversight and reporting necessitate setting target ranges beforehand.</p>	<p>The timeframe column in the draft Plan is the timeframe for completion of the action. The Council will include a note to clarify this point as follows ‘Each action in the Climate Action Plan includes a tracking measure, and timeframe (for the completion of the action)’.</p> <p>In relation to action E26: <i>Assess potential for viable renewable energy projects on a temporary/permanent basis, on council-controlled lands</i>; and E27: <i>Install PV panels on suitable Council roofs such as civic offices, libraries and community buildings</i>. The Council would intend to make significant early progress on these actions and hold them open until 2028 to get the most out of the action. Further, the timeframe is appropriate as timeframes are developed by lead department giving consideration to other actions that will commence in the same timeframe, e.g., the district heating system, the decarbonisation zone etc. their work plans and resources.</p> <p>A monitoring and reporting system to support the LA CAPs will be developed by DECC in collaboration with the local government sector. The Council will consider the application of a traffic light system in conjunction with the DECC reporting mechanisms. Reporting on the % of actions progressed under the CCAP was an output of the previous DECC reporting tool. The CARO encouraged LA’s to include the % progressed metric in annual reports. This was generally accepted as a positive / informative metric which could easily be applied.</p> <p>The Council will aim to report on Council emissions reductions under the CAP by referring to the latest available SEAI M&R figures submitted/ approved.</p>
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FIN-C629-71	<p>I think the plan needs to lay out in a clear way the metrics on what will lead us to achieving our emissions targets. Without this the ambition within the plan will become detached from the goals. We need specific targets for:</p> <p>The number of social housing units and homes that will need to be retrofitted by 2030 to reach the emission reductions targets set out in the plan The number of public building that will need to be retrofitted by 2030 to reach the targets The number of edible plants and trees planted, additional allotments, community gardens, and green roofs and walls required to meet the targets The number of EVs and EV charging units required in Fingal to reach targets Public lighting and the transition to LED's while taking into consideration their impacts on flora and fauna.</p>	<p>The Council's Energy Management Team and Codema are working to identify the optimal pathway and pipeline of projects to achieve the Councils 2030 targets.</p> <p>The Council aims to retrofit all social housing stock to BER B2 by 2030. See action E17 in the draft Plan: <i>Continue to make energy efficiency retrofits to social housing under the DHLGH-supported Energy Retrofit Programme. Ensure that all of FCC's social housing stock has a B2 or cost optimal energy rating by 2030.</i></p> <p>It is not practicable to translate the number of edible plants and allotments / community gardens / green roofs into emissions reductions targets for the County.</p> <p>The National CAP has set targets in relation to the number of EV's on Irish roads, and ZEV has been established to drive the uptake and roll out of supporting infrastructure. The DLA will aim to install the requisite number under the Dublin Region EVCP Strategy.</p> <p>Almost all public lighting has now been converted to LED in Fingal and this will be completed under the draft Plan.</p>
FIN-C629-71	<p>It is important to have specific targets around waste reduction, re-use and recycling. We also need a clear understanding of the public recycling infrastructure needed.</p>	<p>The National CAP and associated National Waste Management Plans set targets around waste reduction, re-use and recycling. The National Waste Management Plan for a Circular Economy 2024-2030 is to be adopted in 2024. The Council aims to support these plans and will aim to provide ample bring banks in support of these targets.</p> <p>The Council will work to support targets in The National Waste Plan for a Circular Economy 2024-2030 by promoting, encouraging, and facilitating high levels of recycling and reuse, and by providing Civic Amenity sites and a network of bring banks across the County. The Council will also continue to support various waste reduction / repair & reuse / circular economy</p>

		<p>initiatives in partnership with stakeholders and will continue to collaborate with the Eastern Midlands Regional Waste Planning Office, The Environmental Protection Agency, The Department of Environment, Climate and Communications and other national bodies to promote waste prevention and circular economy related campaigns and to implement key circular economy and resource management policy tools and regulations at a local level.</p> <p>There are two Civic Amenity Centres in Fingal at the Estuary and Coolmine which accept various different waste streams for recycling. The Environmental Awareness Officer delivers an annual waste reduction program. The Council currently provides 59 bring bank locations throughout Fingal and continues to seek new locations to expand the network.</p>
FIN-C629-9	<p>Most SMART goals, in any theme, are poorly defined.. What I am saying applies to ALL actions, in ALL categories that have little information e.g. "# of xyz". None of them are in any way specific nor do they demonstrate actual impact that can be linked to the removal of x tons of CO2.</p>	<p>The actions in the draft Plan have been developed using the SMART approach. Action tracking measures will track the Councils performance in related to the action stated. The draft Plan includes both mitigation and adaptation actions. Adaptation actions are aimed at improving the County's resilience to climate change.</p> <p>The Council aims to strike a balance across the action list through the adequate provision of enabling infrastructure in a timely manner. The Council will report on all CAP actions annually and will closely monitor and report on its own energy efficiencies and GHG emissions. The Council is not required to report on the GHG emission reductions for the wider community – this is a role for government under the National CAP.</p>
FIN-C629-16	<p>All actions in the Climate Action Plan need to be linked to specific, measurable, achievable, relevant and time-bound goals. Multiple actions are currently too vague with no targets specified, e.g., E10, E11, T1, T4 (none of which have targeted numbers or expected impact included). Actions must also be weighted in their impact so that a report on the progress can reflect in a</p>	<p>All actions in the draft CAP have implementation timeframe and tracking measures associated. The CARO have reviewed the draft list of actions for consistency with the requirements of the LACAP's and have approved same.</p>

	<p>quantifiable manner how much mitigation, or what progress with adaptation, has been made..</p> <p>Additionally, it is meaningless to report that “20% of all actions have progressed” if each action only moves the needle a tiny bit.</p> <p>We propose that in addition to a "Tracking Measure" being captured in the summary action tables, a column is inserted for "Yearly target range". We question how a Key Performance indicator can be assessed without a target range being set in advance, or how "Robust oversight and reporting" can be executed without a target-setting exercise in the first instance.</p>	<p>The Council will engage with the DECC CAP monitoring and reporting systems as required. Reporting on the % of actions progressed under the CCAP was an output of the previous DECC reporting tool. The CARO encouraged LA's to include the % progressed metric in annual reports. This was generally accepted as a positive / informative metric which could easily be applied.</p> <p>Action tables are laid out as per DECC / CARO guidance and consistent with the DLA CAP's.</p>
FIN-C629-16	<p>We believe that transparent tracking and monitoring of progress against the agreed actions is critical. We welcome the reporting outlined on p.124 of the draft plan and the inclusion of tracking measures in the tables of actions in Section 5. However, the measurement of actions alone is insufficient. As per the comments under the Introduction, multiple actions are currently too vague with no targets or expected impact specified. For such actions, targets need to be set and the expected impact assessed. e.g., E30 how many/what proportion of SMEs availing of SEAI funding would be considered a good outcome, what will this achieve in terms of emission reductions? T1 How many additional metres of high-quality walkways is the Council targeting, with what expected reduction in short car journeys? T13 How many traffic</p>	<p>In relation to action E30: The Council is aiming to work with SMEs to promote energy efficient adaptations through Local Enterprise Office initiatives including Green for Business and the Energy Efficiency Grant. Tracking Measure: # of SMEs availing of Green for Business and the Energy Efficiency Grant. The provision and administration of SEAI grants to SME's is not under the direct influence of the local authority and the CAP will not be the primary reporting tool on the uptake. With regard to T1 – the Council will aim to deliver agreed targets as set by the NTA when funding is allocated. Again, the CAP is not the primary reporting tool.</p>

	<p>calming measures is the Council targeting with what expected impact? etc.</p> <p>Specifying targets or targeted ranges for the tracking measures would enable “red/amber/green” traffic light-type status reporting to be developed for each action to indicate whether an ongoing action is on track vs its target or requires remedial action (e.g., green to indicate on-track, amber at-risk, red significant issues).</p>	<p>Action tables are laid out as per DECC / CARO guidance and consistent with the DLA. The Council will consider the application of a traffic light system in conjunction with the DECC reporting mechanisms.</p>
FIN-C629-46	<p>It is deeply concerning that tracking measures are not being properly monitored..</p> <p>It's also extremely worrying that all of the dedicated cycle projects (Fingal Coastal Way, the Sutton to Malahide Cycleway, the Broadmeadow Way and the Royal Canal Urban Greenway) mentioned in this plan 2024-2029 were also mentioned in the 2019-2023 plan and not a single mentioned scheme has actually started construction (except for a 3km section of the Sutton-Malahide greenway; Baldoyle to Portmarnock section that doesn't actually connect the heart of either village.)</p> <p>Tracking measures are a way to gauge progress. Failing to state the number of kms of cycle routes delivered (which are tracking metrics for action T2 in the new Climate Action Plan) makes it next to impossible to measure the success of Active Travel in the previous five-year plan.</p>	<p>Annual Progress reports under the draft CAP will include km of cycle routes delivered. Measurement of walkway and cycleway for active travel infrastructure project is captured through the contract process and is recorded on an asset management system (Pavement Management System) as per Department of Transport policy. Longer linear strategic projects are subject to considerable environmental and planning approvals and as they progress are reported on regularly. This is adequately covered in the draft CAP under action T1 & T2, no changes required. The pavement management system is used to capture all active travel infrastructure. Annual Progress reports under the draft CAP will also include km of cycle routes delivered.</p> <p>A significant body of work is underway and Greenway schemes are at various stages of design, planning, construction.</p>

FIN-C629-51	<p>Tracking measures are not being properly monitored or reported and there must be significant improvement in this regard to enable timely project delivery.</p>	<p>The monitoring and reporting measures are described in detail in the draft Plan in the Implementation & Reporting section.</p> <p>A monitoring and reporting system to support the LACAPs will be developed by DECC in collaboration with the local government sector. The Council will report annually.</p>
FIN-C629-52	<p>The plan states that “KPIs will continue to be added as necessary by the sector and the Council will contribute relevant information as required, to assist in highlighting the progress of the local government sector on climate action”</p> <p>Some examples of current tracking measures include:</p> <p>E 27 Install PV panels on suitable Council roofs such as civic offices, libraries and community buildings</p> <p># of panels installed</p> <p>%age energy consumption obtained from solar panels. A Baseline should indicate where we start from and from this a realistic target can be set e.g. by 2030 this should be 50%</p> <p>R9 Assessment of all apartment complexes within Fingal on the management of food waste and use of brown bins. Engagement with apartment management companies to ensure compliance with legislation and to encourage segregation of food waste by residents and subsequent collection by authorised collectors.</p> <p># of apartment complexes engaged with and the # apartment complexes with brown bin collection</p>	<p>Each action has an associated implementation timeframe and tracking measure. The Council will report on implementation progress on an annual basis.</p> <p>The Council’s Energy Management Team and Codema are working to identify the optimal pathway and pipeline of projects to achieve the Councils 2030 targets. This work is well advanced. Local Authorities were not required to undertake this as part of the development of the LACAP’s as CAP timelines wouldn’t allow for this. However, local authorities are unlikely to break figures down to the level of no of PV’s installed.</p> <p>It is estimated that at present 15% of apartment and mixed-use developments within Fingal have a brown bin service in place. The focus will be to increase this target to 100% over time to ensure all apartment and mixed-use developments have a brown bin service place and that residents are provided with the necessary guidance and supports to fully utilise the service thereafter.</p>

	<p>service in place.</p> <p>The target should be 100% of apartment complexes have brown bin collection points in place</p> <p>T33 Promotion of Cycle-to-Work Scheme for Council staff</p> <p># of staff availing of scheme</p> <p>Availing of scheme does not indicate that they now utilise bikes as mode of commuting to work</p>	<p>The draft CAP includes a number of staff travel actions.</p>
FIN-C629-62	<p>The overall plan is very well laid out and undoubtedly a challenge to compile in such a comprehensive manner.</p> <p>In the areas where specific information is known, it would be prudent to see more specific targets, especially around retrofits and active travel.</p> <p>Prioritizing actions known to reduce emissions or impacts (even if exact measurement is challenging) is recommended as while measuring is very important, measurement is not reduction. It would be preferable to see more specific targets, even if only a few per section or department to provide some baseline information for implementation and activity beyond the high level 2030 and % figures.</p>	<p>The National CAP has targets in relation to retrofits and is funding local authority social housing retrofits. The Council is aiming to retrofit all social housing by 2030 subject to national funding allocation. The NTA have targets in relation to active travel and is financing local authority active travel work programmes.</p> <p>The Council's Energy Management Team and Codema are working to identify the optimal pathway and pipeline of projects to achieve the Councils 2030 targets. This work is well advanced.</p> <p>There is some ranking of actions within the action tables - actions are generally ranked within each theme and sub theme.</p>
FIN-C629-75	<p>There is a need to ensure Actions are time bound within the Fingal Climate Action Plan. All Actions</p>	<p>Each action in the draft Plan has a timeframe for completion within the action table.</p>

	should have a target implementation date for clarity, so that progress is measurable.	
FIN-C629-55	Monitoring and Reporting: Simple to understand reporting systems, tracking progress and measuring the effectiveness of initiatives implemented will encourage further buy in from the business and other communities.	The Council will update and report progress on the implementation of the actions across all six action areas of the climate action plan through its relevant governance and reporting structures and communication channels. These reports will be available to the public. In addition, action C5 'Develop a library of climate material including webinars, books, articles and digital training resources covering Climate Science, Climate Action, Just Transition, the LACAP, National and Local Climate Action Plans and make available to the public through the Fingal's social media channels and Fingal Libraries', will provide the public and communities such as the business community with practical resources that will assist in better understanding climate change and the progress the Council is making.
FIN-C629-71	Annual reports should include progress, financials and emissions reductions.	A monitoring and reporting system to support the LACAPs will be developed by DECC in collaboration with the local government sector.
		<p>CE Recommendation: Text on page 22 will be reworded to include the following:</p> <p>“Action review and development is one of the key building blocks of this Draft Plan. This has been an iterative process, - building on the successful implementation of the Climate Change Action Plan 2019 – 2024, and associated learnings. Teams aimed to develop SMART actions (Specific, Measurable, Achievable, Realistic, Timebound) and considered the full role of the Council, where the Council could influence, facilitate / co-ordinate, and advocate for climate action. Each action in the Climate Action Plan includes a tracking measure, and timeframe (for the completion of the action).”</p>

Implementing and Reporting		
Funding and Resources		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-16	All actions must be appropriately funded and resourced. It is not clear from p.123 of the draft plan whether this is the case, although the mentioned expansion of the Council's core Climate Action team and references to government and European funding opportunities are positive. We urge the Council to ensure that all necessary funding is obtained, ring-fenced, sufficient staff are in place and highest impact actions are prioritised, to support and deliver on the plan.	All actions are funded for 2024. The Councils budget is agreed on an annual basis. The Council doesn't anticipate any funding constraints in the implementation of its actions under the draft Plan. The Council is also leveraging national funding for example through NTA active travel funding and Department of Housing funding for social housing retrofits, and National and EU funding through Codema, for example action E12 DeliveREE.
FIN-C629-55	No Climate Action Plan will succeed without the appropriate funding and access to financial resources at local, national and EU levels are vital to its success.	
FIN-C629-66	EU funding for Climate Actions appears to be absent from the Draft CAP. DCC have availed of same.	
FIN-C629-72	It is essential that all actions are adequately funded and resourced. It remains unclear from page 123 of the draft plan whether this is the case, although the mentioned expansion of the Council's core Climate Action team and references to government and European funding opportunities are positive. We strongly urge the Council to secure all necessary funding, ring-fence it, ensure sufficient staff are in place, and prioritise actions with the highest impact to effectively support and deliver on our Climate	All actions are funded for 2024. The council's budget is agreed on an annual basis. The council doesn't anticipate any funding constraints in the implementation of its actions under the draft Plan. The council is also leveraging national funding for example through NTA active travel funding and Department of Housing funding for social housing retrofits, and national and EU funding through Codema, for example action E12 DeliveREE.

	<p>Action Plan.</p> <p>A number of important actions require funding from outside the Council, primarily central government. Prime among these are social housing retrofit and active travel infrastructure investment. In starting large-scale work in these areas, the Council initially faced capacity constraints and the size of central government grants was not a constraint on delivery. Now the point has been reached where Council is capable of delivering these investments at greater speed than funding is being allocated. The speed of rollout of social housing retrofit is entirely mismatched with the objective of halving emissions by 2030. Additionally, social housing retrofit investments will help to build the private sector retrofit capacity required to achieve retrofit in the private housing stock, both owner-occupied and rented. The Plan should set out the current slow rate of retrofit and make clear that the Council is capable of faster retrofit if funded, detailing the speed and scale of what is possible, and the level of funding required.</p> <p>Pretty much the same consideration as regards Council capacity and central funding applies to active travel infrastructure. Initially the Council lacked the capacity to draw down the available active travel funding from the NTA in its entirety but having increased that capacity, the availability of funding is now a constraint. The Plan should set out</p>	<p>The draft Plan has made reference to the fact that the Council is constrained by social housing retrofit funding and states: <i>the Council is constrained by government funding allocations in relation to social housing retrofits</i>, on page 42. The draft Plan will be amended to set out the current slow rate of retrofit and make clear that the Council is capable of faster retrofit if funded..</p> <p>Proposed amendment: Although the revised programme provides for significant upscaling in the level of funding available; the Council is constrained by Government funding allocations in relation to social housing retrofits. The council responds to the level of Government funding that it receives in yearly allocations for social housing retrofit programmes. The council received €3,905,234 funding in the 1st two years of the current scheme. This resulted in the retrofit of 158 properties. A further 120 completed this 3rd year. Funding levels under this programme should increase annually to deliver a total of 36,500 social houses nationally, retrofitted to BER B2 or equivalent, by 2030. The council analyses and reports annually on retrofits completed and any funding constraints limiting the numbers of properties completed to meet targets.</p> <p>Action E17 will be amended as follows: Continue to make energy efficiency retrofits to social housing under the DHLGH-supported Energy Retrofit Programme. Ensure FCC's social housing stock has a B2 or cost optimal energy rating where feasible by 2030 (subject to programmes and funding support).</p>
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	what level of active travel infrastructure development is possible, and the scale of funding required.	
FIN-C629-64	The human resource capacity on climate action, namely the Climate Action Team is noted from this section though one might suggest that the responsibility for climate action extends to each, and every member of Fingal CC. Climate action should be seen as “core business” for all staff and job descriptions should indicate that and people should be held to account for what they do.	Fingal County Council notes comments made by the HSE in relation to human resource capacity. Climate action is actioned by all departments in Fingal County Council. The Climate Action Plan will be monitored by a dedicated climate action team working with all council departments, supported by a steering group at executive management level; and working with the Climate Action, Biodiversity, Environment Strategic Policy Committee, and elected members.
FIN-C629-71	I think it is very important that we have a clear picture of projected costs of mitigation, adaptation and climate action contained within the report, even if there is not corresponding funding provided. It's important that we are able to in some way understand the extent to which plans remain unfunded. Without this clarity policymakers will not be in a strong position to work towards delivery.	The implementation of the draft Plan will be across all Council departments. Climate action is being mainstreamed into all Council business. Funding provision for departmental actions is addressed through annual budgetary processes and controls. Large elements of the Council's annual budget will have a climate action element. All actions are funded for 2024. The Council doesn't anticipate any funding constraints in the implementation of its actions under the draft Plan. National policy makers and the Department of Housing are aware of the local authority funding requirements for social housing retrofits.
		<p>CE Recommendation: Text on page 42 will be reworded to include the following:</p> <p>Proposed amendment: Although the revised programme provides for significant upscaling in the level of funding available; the Council is constrained by Government funding allocations in relation to social housing retrofits. The council responds to the level of Government funding that it receives in yearly allocations for social housing retrofit programmes. The council received €3,905,234 funding in the 1st two years of the current scheme. This resulted in the retrofit of 158 properties. A further 120 completed this 3rd year. Funding levels under this</p>

	<p>programme should increase annually to deliver a total of 36,500 social houses nationally, retrofitted to BER B2 or equivalent, by 2030. The council analyses and reports annually on retrofits completed and any funding constraints limiting the numbers of properties completed to meet targets.</p> <p>Action E17 will be amended as follows: Continue to make energy efficiency retrofits to social housing under the DHLGH-supported Energy Retrofit Programme. Ensure FCC's social housing stock has a B2 or cost optimal energy rating where feasible by 2030 (subject to programmes and funding support).</p>
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Implementing and Reporting		
Environmental Governance Principles		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-16	We strongly support the environmental principles in Table 7.1 of the plan. We believe that such principles should be embedded into all the Council's work, not just in the context of the actions in the draft Climate Action Plan. Otherwise, there is a risk that work undertaken outside of the context of this plan could undermine climate action.	Given the importance of climate change, climate action is included as an overarching and cross-cutting theme across the Fingal County Development Plan in line with International, National and Regional policies and objectives. Chapter 5 Climate Action details Fingal's position in relation to this key issue, in terms of a policy approach to the transition to a low carbon economy and to Fingal becoming climate resilient, with a strong emphasis on reduction in energy demand and emissions, through a combination of effective mitigation and adaptation responses to climate change.
FIN-C629-72	We strongly endorse the environmental principles outlined in Table 7.1 of the plan. We believe these principles should be integrated into all of the Council's work. They should extend beyond the context of the draft Climate Action Plan in-so-far as they are interwoven into every aspect of the Councils work.	

	Failing to do so may risk undermining climate action in work conducted outside the scope of this plan. It is essential to uphold these principles across all Council activities to ensure a consistent commitment to environmental sustainability.	
		CE Recommendation: No change to draft plan.

Implementing and Reporting		
Sustainable Development Goals		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-52	As SDG Champions we welcome the inclusion of SDGs into the plan. In its current presentation it would appear that this is an added-on exercise and was not an intrinsic force behind the development of the plan. The SDGs represents a strong framework of complex issues to ensure a more sustainable and better world for all. The 17 Individual Goals are all interlinked and need to be progressed together. The SDG framework should be embedded into all departments of FCC and across all actions. This will ensure that each action maximises its potential to contribute to this global plan as well as ensuring that there is no negative unintended impacts to any goal.	Fingal County Council notes comments made by Rush Tidy Towns in relation to the Sustainable Development Goals (SDG). The actions and objectives set out in the draft climate action plan contribute to the progression of Irelands commitment to achieving the 2030 Agenda for Sustainable Development. The Council has aligned each action of the draft Climate Action Plan with the SDG's whilst focusing on the climate goal. As referenced in the draft Climate Action Plan, the alignment is available to view in further detail in the appendices of this plan.
		CE Recommendation: No change to draft plan.

Implementing and Reporting		
Engagement and Collaboration with Stakeholders		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-57	The IGBC would like to stress the importance of collaboration with neighbouring counties, as if lower standards are allowed in one jurisdiction, it makes it more difficult for neighbouring local authorities to apply higher standards (e.g., for car parking spaces). Consistency of approach is critical.	Fingal notes and agrees with comments made by the IGBC in relation to collaboration with adjoining local authorities. The Council did collaborate with other Council's in drafting the plan.
FIN-C629-64	One would hope that there is collaboration with key stakeholders who have a responsibility for the protection of public health including the HSE, the EPA and Uisce Éireann for example.	Fingal County Council works with a variety of stakeholders to both prepare and implement the draft Climate Action Plan. These stakeholders include but are not limited to the EPA, Uisce Éireann and the HSE.
FIN-C629-75	There is a critical need to ensure adjoining LA's play their part. At present there are a number of issues with Section 4 Discharges from Co. Meath on the Delvin River - this will impact the delivery of measures if MCC do not play their part in addressing impacts on shared assets.	This is not a matter for the draft Climate Action plan.
		CE Recommendation: No change to draft plan.

Implementing and Reporting		
Integrating Policy and Frameworks		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-57	<p>On tracking progress, while the suggested frameworks are good, we would like to encourage Fingal CoCo to use the Build Upon Energy Renovation Framework to capture data on the impact of its renovation programme. The framework was developed in close collaboration with Dublin City Council (Cork City, Laois and Offaly County Councils), and includes 15 environmental, social and economic indicators. While it can also be used in a very flexible way, e.g., you may use 3-4 indicators, the inclusion of indicators focusing on thermal comfort, IAQ and climate resilient, may make it easier for the Council to communicate effectively on the impact of its renovation programme. But the IGBC would be happy to share all the tools and training materials developed as part of that project.</p>	<p>The Council will review pilot schemes using indicators from the Build Upon Energy Renovation Framework with the intention of applying to further stock post the initial project.</p>
FIN-C629-64	<p>The plan should support actions that move Ireland to “a low carbon, climate-resilient, and environmentally sustainable economy by 2050” as set out in the Climate Action and Low Carbon Development Act 2015 – 2021. The latest Government Climate Action Plan 2023 should form the basis for developing a low carbon, climate-resilient, and environmentally sustainable Fingal by 2050 with interim targets for 2030.</p>	<p>Fingal County Council notes and agrees with this statement made by the HSE. The draft Plan has been developed in line with the national transition objective as outlined in the Climate Action and Low Carbon Development (Amendment) Act 2021 "to pursue and achieve, the transition to a low carbon, climate resilient and environmentally sustainable economy by the end of 2050" and is prepared in line with guidance issued from the Department of Environment Climate and Communications and the National Climate Action Plan 2023. The actions included in this draft plan reflect this objective.</p>

FIN-C629-64	The EHS further recommends that performance is measured against the plans contribution to delivering on the Healthy Ireland Framework	Fingal County Council notes this comment from the HSE. The Council will update and report progress on the implementation of the actions across all six action areas of the climate action plan through its relevant governance and reporting structures and communication channels.
		CE Recommendation: No change to draft plan.

Implementing and Reporting		
Action Suggestions		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-64	Suggested Example Action: A plan that supports a just transition to a Climate Neutral Ireland and leaves no one behind.	Fingal County Council welcomes comments made by the HSE in relation to inclusivity. As stated in the targets of the Draft Fingal Climate Action Plan, this plan aims to facilitate a just transition across the County. This ensures that the transition towards meeting the National Climate Objective happens in a way that leaves no one behind. This is also reiterated in the national Climate Action Plan 2023 which states "Delivering a just transition is based on recognising the transformational level of change required to meet these targets and having a shared understanding that the transition is fair and just and that the costs are shared equitably. Our climate policies should therefore seek to protect the most vulnerable."
FIN-C629-64	Suggested Example Action: The plan should support action towards the achievement of the Sustainable Development Goals as set out in Agenda 2030. Specifically, it should deliver towards SDG 3	Fingal County Council notes comments made by the HSE in relation to the Sustainable Development Goals (SDG). The actions and objectives set out in the draft Climate Action Plan contribute to the progression of Irelands commitment to achieving the 2030 Agenda for Sustainable Development. The Council has aligned each action of the draft Climate Action Plan with the SDG's (including SDG 3) whilst focusing on the climate goal. As referenced in the draft climate action plan, the alignment is available to view in further detail in the appendices of this plan.
FIN-C629-64	The EHS recommends "the comply or explain" approach for all sections and staff in Fingal CC.	Climate action is a core part of business within Fingal County Council. In partnership with the CAROs and the Local Authority Services National Training Group (LASTNG), climate action training continues to be rolled out

		for the entire local authority sector, including elected representatives, to empower and upskill staff to act as leaders on climate action. In addition to this, there is regular climate action awareness messaging through internal Council communication channels. This work is supported by action C22 and C23.
FIN-C629-64	In the context of accountability and reporting the EHS recommends some degree of focus on capturing learning including learning from failure and suggest the inclusion of evaluation such as mid-term and end of term evaluation for the period of this climate action plan. Perhaps each of the four local authorities can conduct a peer led evaluation of each other?	Fingal County Council notes this comment from the HSE. The Council will update and report progress on the implementation of the actions across all six thematic areas of the draft Climate Action Plan through its relevant governance and reporting structures and communication channels. Fingal County Council regularly engages with the CARO and Dublin Local Authorities.
FIN-C629-64	Put Health at the core of the plan.	Fingal County Council notes this comment made by the HSE. Fingal's draft Climate Action Plan aims and targets reflect the national transition objective as outlined in the Climate Action and Low Carbon Development (Amendment) Act 2021 <i>"to pursue and achieve, the transition to a low carbon, climate resilient and environmentally sustainable economy by the end of 2050"</i> and is prepared in line with guidance issued from the Department of Environment, Climate and Communications.
		CE Recommendation: No change to draft plan.

4.15 Submissions relating to Other Comments

Other Comments		
Collaboration		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-56	<p>daa welcomes the opportunity to submit a response to Fingal's Draft Climate Action Plan 2024-2029.... daa has made a commitment to achieve Net Zero Carbon Emissions across all of our operations by 2050 at the latest. Further to this, Dublin Airport is committed to achieving a 50% improvement in energy efficiency and a 51% reduction in carbon emissions by 2030, which aligns with the Fingal Climate Action Plan Targets.</p> <p>We welcome the Plan, but we would like to see a stronger focus on collaboration with businesses, particularly the aviation sector as this is unique to Fingal.</p>	<p>The Council welcomes the submission from the Dublin Airport Authority (daa). The Council believes the draft CAP is well balanced. The Council will continue to engage with the business sector through the implementation of the draft CAP. Actions relating to business are throughout the CAP and in particular in the Community Engagement theme.</p>
FIN-C629-67	<p>Through the Smart Balbriggan partnership, the Centre extends its' bevy of researchers for projects and offers support across many areas including the development of the Decarbonised Zone in Balbriggan, which provides ample opportunities to explore solutions together.</p>	<p>Fingal County Council notes comments of support made by Smart Balbriggan. The Council will engage with all stakeholders to influence and facilitate emissions reductions in the DZ.</p>
FIN-C629-64	<p>The EHS expresses the wish that the HSE is viewed as an external partner for all aspects of this plan in addition to Emergency Management. Perhaps Residents Associations can also be viewed at partners on a more micro level.</p>	<p>Fingal County Council notes the comment made by the HSE in relation to external partners. The Council recognises the importance of stakeholders and where relevant the Council will reach out to stakeholders for input and collaboration. The Councils work on engagement is reflected within the Community Engagement theme of the draft plan.</p>
		<p>CE Recommendation: No change to draft plan.</p>

Other Comments		
Aviation Emissions		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-16	We note that Dublin Airport and the impact of air travel on greenhouse gas emissions are not mentioned at all - should Fingal County Council not at least aim to use its influence to reduce the impact of the aviation sector?	Aviation emissions are outside the scope of a local authority climate action plan. This is within the remit of the Dublin Airport Authority (daa), and the Department of Transport.
FIN-C629-29	One area which will seriously have to be taken into consideration is the effect the aircrafts are having on the environment as you only have to look at Ryanair GHG Emitter	
FIN-C629-34	In Fingal the biggest producer of carbon dioxide is the Air Traffic to and from Dublin Airport and this should be controlled and improved.	
FIN-C629-38	The biggest producer of GHG emissions in Ireland is airline flights from Dublin airport. FCC has the ability to influence the DAA or airport in reducing GHG emissions via the planning process. Please add a project to encourage the Airport to monitor and reduce GHG emissions.	
FIN-C629-40	Please do not forget to take into account Ireland's largest greenhouse gas emitter i.e., Dublin airport.	
FIN-C629-41	Please do not forget to take into account Ireland's largest greenhouse gas emitter i.e., Dublin airport.	

FIN-C629-42	Please do not forget to take into account Ireland's largest greenhouse gas emitter i.e., Dublin airport.	
FIN-C629-43	Please do not forget to take into account Ireland's largest greenhouse gas emitter i.e., Dublin airport.	
FIN-C629-74	Fingal County Council must address the largest emitter in the country and formalise a plan to reduce these emissions. Dublin Airport.	
FIN-C629-45	The emissions from Aircraft along the excessive noise has not been included in the climate change Strategy. Aircraft create more GHG emissions than any other mode of transport.	
FIN-C629-58	In your plan it's essential to take Ireland's biggest greenhouse gas emitter being Dublin airport. This information is from COP27. While all the measures in the plan are excellent but how effective can they be if the largest polluter is not being addressed. Both sustainable economic development of Dublin airport and tackling climate change need to be balanced they are not mutually exclusive. Dublin Airport is the largest Irish polluter last year..	
FIN-C629-30	Aircraft ticket prices and the lack of taxation in the area is encouraging people to fly more to countries and zones that are badly impacted by climate change. In addition, airlines should be paying appropriate taxes.	The Council has no role in the regulation or operation of Dublin airport flight activities in the context of climate change, or in ticket pricing or the taxation of airlines.
FIN-C629-30	Dublin airport are currently involved in relocation of large quantities of PFAS contaminated soil from airport lands. Why is this land contaminated and what	This comment is outside the scope of the draft Climate Action Plan.

	is being done to prevent this happening in the future? Has this contamination spread to neighbouring areas?	
FIN-C629-30	In terms of noise pollution, up to 30,000 people in Fingal and East Meath are badly impacted by flightpaths in use from the North Runway. A 320 million investment on behalf of the Irish people is being misused by daa using these illegal flightpaths. Alternative flightpaths are available and should be used instead. The current situation is antagonising 30,000 people and is having a disastrous effect on their lives. This needs to be addressed urgently.	Dublin airport flightpaths are outside the scope of the draft Fingal County Council Climate Action Plan.
FIN-C629-59	<p>The International Civil Aviation Organization (ICAO) recognises that Aviation NOx emissions have a significant impact on local air quality per the extract below of their 2022 Environmental report.</p> <p><i>Aviation NOx emissions have impacts on local air quality and human health, both through emissions in and around airports, but also from emissions at altitude affecting background concentrations...</i></p> <p>I would request that: FCC include air quality monitoring in the Fingal area along the flight path of aircraft to monitor emissions. Include NOx air quality requirements as part of planning Environmental Impact Assessments for the airport developments.</p>	The airport carries out air quality monitoring as a condition of the permission for the North Runway, this information is available on the daa website and is submitted to the Council.
FIN-C629-56	As the airport is unique to Fingal, we would suggest an aviation transport section be included in the Transport section of the Fingal Climate Action Plan. Air travel is regularly singled out for its carbon emissions, and we	Aviation emissions are outside the scope of a local authority climate action plan. The Council will continue to support the ongoing implementation of the daa carbon reduction strategy through active participation in the Dublin Airport Environmental Working Group, and in particular through, support

	<p>would welcome the opportunity to work with Fingal to collaborate on working with our airline partners to support them in reducing emissions and adoption and adaptation to all types of sustainable aviation fuels in terms of required infrastructure. Our Carbon Reduction Strategy discusses opportunities to work with our airport stakeholders and partners to address Scope 3 emissions at the airport.</p>	<p>and facilitation of more sustainable transport modes and smarter active travel options for surface access to and from the airport.</p>
		<p>CE Recommendation: No change to draft plan.</p>

Other Comments		
Miscellaneous		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-26	<p>We need a swimming pool out this way (Skerries) - please please please - surely there is some space somewhere- stop building houses with no school spaces, train spaces, GP spaces, crèche spaces and give us a swimming pool - people are driving 20 mins plus every day in every direction to get their kids to lessons</p>	<p>The provision of a swimming pool for the Skerries area is outside the scope of the draft CAP, however the Council has several supporting policies around 'Avoid Shift Improve' and transport emissions.</p>
		<p>CE Recommendation: No change to draft plan.</p>

Other Comments		
Requested Edits		
Submission Reference Number	Submission Summary	CE Response
FIN-C629-51	Include reference to 2018 as the baseline year with every reference to “delivering a reduction in greenhouse gas emissions of 51% by 2030	Local Authorities must reduce their greenhouse gas emissions by 51% by 2030 in comparison to a 2018 baseline. Referral to the 2018 baseline is adequately mentioned throughout the draft plan with particular reference made to this data under the Baseline Emissions Inventory which can be found on page 25.
FIN-C629-51	Include Nature-Based Solutions in the Venn diagram intersect of Figure 1.1 Climate Action Mitigation and Adaptation Actions	The referenced graphic has been provided by the Climate Action Regional Offices (CARO). Nature Based solutions are addressed within this Venn Diagram under the term ‘Green Infrastructure’.
FIN-C629-51	In the ‘Overview of Climate Change’, include some implications of the future climate projections... In addition, please note the dangers of the Business and Usual approach i.e. an increase in the global mean temperature of 4o above pre-industrial levels.	Adequately addressed within the draft Plan. The draft CAP addresses future hazards and implications of climate change in the chapter ‘Evidenced Based Climate Action’. These climate change projections are referred to as part of the Climate Change Risk Assessment (from pg. 30), which provides an assessment of climate change risks and impacts for Fingal.
FIN-C629-51	In the ‘Potential Additional Benefits and Opportunities’ section, please note reduced energy financial costs in the long-term given the increasing costs of fossil fuels	Fingal County Council notes comments made in relation to the co-benefits of climate action. The list of co-benefits acknowledged within the introduction and each thematic area of the draft climate action plan is non-exhaustive and balanced.
FIN-C629-51	Include publicly owned land such as green spaces in the list of actions for which the Council is ‘Fully Accountable’. There is significant scope to improve the carbon sequestration and biodiversity of green spaces in urbanised areas.	This is adequately addressed in the draft CAP across the Nature Based Solutions list of actions and, also land use and acquisition actions.
FIN-C629-51	A note on how Fingal County Council plans to influence climate action beyond its jurisdictional area is needed given the extensive amount of agricultural land in Fingal	Adequately addressed within the draft CAP. The draft CAP includes actions for which the Council is fully accountable across its own buildings, operations, services and functions; and actions for which the Council can influence, co-ordinate and facilitate and advocate for climate action. The role of the Council is stated against each action under the title ‘LA Role’.

		<p>Actions such as but not limited to C1, C2, and C5 aim to increase climate awareness and assist in facilitating action with a variety of communities. Actions N16-N19 state how the Council intends to facilitate, influence, and coordinate climate action in relation to Food and Agriculture.</p>
FIN-C629-51	<p>Include "A range of other policies and plans support the Draft CAP including the Council's Corporate Plan, The County Development Plan, the Green Infrastructure Strategy, The Tree Strategy Forest of Fingal, River Basin Management Plan 2024-2027, and the Fingal Biodiversity Action Plan 2022-2030" in the Introduction.</p>	<p>Adequately addressed within the draft CAP. The Introduction on page 12 states "<i>A range of other policies and plans support the Draft CAP including the Council's Corporate Plan, The County Development Plan, the Green Infrastructure Strategy, The Tree Strategy - Forest of Fingal, and the Fingal Biodiversity Action Plan 2022-2030</i>".</p>
		<p>CE Recommendation: No change to the draft Plan</p>

4.16 Submissions on Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)

Submission Reference Number	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
FIN-C629-8	Dear LACAP Team, Environment, Climate Action and Active Travel Department,	The Draft LACAP has been supported by a Natura Impact Report as well as an AA Screening report. The AA Screening concludes that mitigation measures are required to avoid or minimise significant effects on European sites which are then detailed in the NIR. This consultation response appears to have missed the conclusion.	None	None.
	Naul Community Council welcomes the opportunity to engage with Fingal County Council's public consultation of the Draft Fingal Climate Action Plan 2024-2029.			
	While we broadly welcome the Draft Climate Action Plan 2024-2029, we would like to highlight a critical omission from the Draft Plan which we feel must be addressed in order for the plan to be consistent with both National Law and European Directives.			
	It is essential that any potential impacts on all relevant nearby European Sites and indeed any relevant Candidate European Sites are included in the Appropriate Assessment Screening Process, so that the public are fully informed of any potential impacts when considering and/or preparing submissions on the Draft Climate Action Plan 2024-2029.			
	In this context, we feel it is important to rectify omissions at the earliest opportunity during the public consultation period. This may be addressed by publishing a revised Appropriate Assessment Screening Report and/or Errata document and consideration of extending the consultation period so that the public can fully consider the plan in its totality and any potential impacts which may arise from the Draft Plan.			

<p>Naul Community Council intend to submit a further detailed submission on the Draft Climate Action Plan 2024-2029. However, in lieu of our more comprehensive assessment of, and feedback on the Draft Plan, we feel it would be prudent to highlight a critical omission from the Appropriate Assessment Screening in respect of the Draft Fingal Local Area Climate Action Plan (LACAP) 2024-2029.</p>			
<p>Omission of Candidate Special Protection Area (cSPA) from Appropriate Assessment Screening in respect of the Draft Climate Action Plan 2024-2029</p>	<p>The Draft LACAP focuses on high level processes and actions which will be implemented subject to existing planning and environmental regulation structures. The NIR identifies the actions which have potential to interact with ecological pathways and provides mitigation measures to this effect. Considering the details of the North-West Irish Sea cSPA (site code 004236) it is identified that the environmental envelope previously</p>	<p>Update the NIR to include details of the North-West Irish Sea cSPA (site code 004236).</p>	<p>Update the SEA ER to include details of the North-West Irish Sea cSPA (site code 004236).</p>
<p>In assessing the accompanying Natura Impact Report for the Fingal Local Area Climate Action Plan 2024-2029, Section 3 - Screening for Appropriate Assessment, prepared by Fehily Timoney and Company, completed on 15/09/2023, it is apparent that a site submitted to the European Commission in recent months has not been factored into the Appropriate Assessment Screening in respect of the Draft LACAP.</p>			
<p>The site in question is the North-West Irish Sea cSPA (site code 004236 - https://www.npws.ie/protected-sites/spa/004236) which was formally announced on the 13th of July 2023 by the Department of Housing, Local Government and Heritage (DHGLH).</p>			
<p>On the 13/07/2023, the Department of Housing, Local Government and Heritage announced the designation of a new candidate SPA with the accompanying press release:</p>			
<p>“Minister of State for Heritage and Electoral Reform, Malcolm Noonan TD, has announced details of Ireland’s largest ever protected area for birds. The new North-West Irish Sea Special Protection Area (SPA) is to be designated under the EU Birds</p>			

	<p>Directive and will cover more than 230,000 hectares of important marine waters for a range of bird species throughout the year. It increases the percentage of Ireland's marine waters which are protected under the EU Birds and Habitats Directives to over 9%.</p>	<p>considered covers the ecological concepts required for the protection of this site. Therefore, there are no additional ecological considerations required and the North-West Irish Sea cSPA (site code 004236) will be added to the material considered within the final NIR for the plan.</p> <p>The AA process is not complete at this stage, and it will be clearly stated in the final NIR and subsequent determination that this site has been considered.</p>		
<p>The new SPA adjoins twelve existing SPAs already designated along the coast in this area and the publication of detailed information and maps for the site brings certainty and clarity to a long mooted proposal for protections for marine birds in this area.</p>				
<p>Speaking today, Minister Noonan said: 'I am delighted that we have been able to realise a long-held ambition to extend and significantly improve the protections in place for our marine birds. This site, at more than 230,000 hectares, is the largest SPA designation for birds in Ireland's history. We are working hard as a Government to ensure we have robust protections in place for nature as we work to deliver on our offshore renewable energy objectives. Biodiversity action and climate action must go hand in hand.'</p>				
<p>Director General of the National Parks and Wildlife Service, Niall Ó Donnchú, said: 'This is a milestone day for the protection of Ireland's marine biodiversity. The estuaries and bays that open into the North West Irish Sea, along with connecting coastal stretches of intertidal and shallow subtidal habitats, and the more pelagic waters further out to sea provide safe feeding and roosting habitats for a range of bird species including the seabirds that breed at colonies along our islands and coastal headlands. Ireland rightly has ambition and purpose to make a significant contribution to the targets set in the EU Biodiversity Strategy 2030. This new site is a determined step in that direction.'</p>				

<p>The new North-west Irish Sea SPA extends offshore along the coasts of counties Louth, Meath and Dublin. More detailed information about the site, including a map, a species list and a list of the Activities Requiring Consent (ARCs) for the site is available on www.npws.ie/protectedsites.</p>			
<p>The new site will be a Special Protection Area (SPA) under the EU Birds Directive, of special conservation interest for the following species: Common Scoter; Red-throated Diver; Great Northern Diver; Fulmar; Manx Shearwater; Shag; Cormorant; Little Gull; Kittiwake; Black-headed Gull; Common Gull; Lesser Black-backed Gull, Herring Gull, Great Black-backed Gull, Little Tern, Roseate Tern, Common Tern, Arctic Tern, Puffin, Razorbill and Guillemot.</p>			
<p>The new site adjoins twelve existing SPAs already designated for the protection of birds along the coast. These are: Lambay Island SPA; Skerries Island SPA; Ireland's Eye SPA; Howth Head SPA; Rockabill SPA; South Dublin Bay and River Tolka Estuary SPA; Boyne Estuary SPA; River Nanny Estuary and Shore SPA; Rogerstown Estuary SPA; Malahide Estuary SPA; Baldoyle Bay SPA and North Bull Island SPA.”</p>			
<p>See full press release here: https://www.gov.ie/en/press-release/bc137-minister-noonan-announces-irelands-largest-protectedarea-for-birds/.</p>			
<p>Legal Provisions for Candidate Sites in the Natura 2000 Network</p>	<p>This is in keeping with the details of the NIR report and methods undertaken.</p>	<p>None.</p>	<p>None.</p>
<p>According to the DHLGH: “SACs and SPAs are fully protected by law in Ireland from when the Minister gives notice of his intention to designate the sites. At present, all SACs are candidate SACs. Candidate and proposed sites are included as part of the Natura 2000 network. Indeed, potential SPAs enjoy protection from the</p>			

	<p>time when they are identified as meriting consideration for designation.”</p>			
	<p>The Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities, NPWS, also states:</p>			
	<p>“Article 6(3) requires that any plan or project that is not directly connected with or necessary to the management of the Natura 2000 site concerned but is likely to have a significant effect on it, on its own or in combination with other plans and projects, is to be authorised only if it will not adversely affect the integrity of that site. Screening for AA and, if screening indicates the need, AA itself, must be carried out and the assessment and conclusions recorded to ensure that existing and future plans or projects are not authorised if they are likely to adversely affect the integrity of a site. These safeguards are designed to ensure the conservation of Natura 2000 sites.</p>			
	<p>The requirements of the Habitats Directive in respect of plans and projects are similar in many respects to Environmental Impact Assessment (EIA) of projects, and Strategic Environmental Assessment (SEA) of plans and programmes. However, the focus of AA is targeted specifically on Natura 2000 sites and their conservation objectives. Article 6(3) and 6(4) of the Habitats Directive place strict legal obligations on Member States, with the outcomes of AA fundamentally affecting the decisions that may lawfully be made.</p>			
	<p>It is a basic responsibility of all agencies of the state, including planning authorities, to act diligently to ensure that their decisions in the exercise of their functions, as well as their actions, comply fully with the obligations of the Habitats Directive.” (Source:</p>			

	<p>https://www.npws.ie/protected-sites/guidanceappropriate-assessment-planning-authorities).</p>			
	<p>According to the Office of the Planning Regulator (OPR) Practice Note PN01 - Appropriate Assessment Screening for Development Management, March 2021, Page 5:</p>			
	<p>'The screening determination must be based on scientific information relevant to the likely effects on the conservation objectives of the relevant European sites. The information should be up-to-date and based on the best available techniques and methods to estimate the presence and extent of effects. This is because if there is any scientific uncertainty as to the absence of significant effects, the project must be screened in for appropriate assessment.</p>	<p>The screening determination was undertaken and concluded that there was a need for Stage 2 Appropriate Assessment. Therefore, this is in keeping with the existing report.</p>	<p>None</p>	<p>None.</p>
	<p>In the vast majority of cases the information provided by the applicant (including the project description) and publicly available information in relation to the European sites in question and information published by the NPWS, the EPA and others in relation to such sites, should provide a sufficient level of objective scientific information to allow the planning authority to make an informed decision on screening.'</p>			
	<p>Page 6 of OPR Practice Note PN01 outlines: '...Regulation 42(1) requires that any public authority (including a local authority) must carry out a screening for appropriate assessment of a plan or project, for which an application for consent is received or which a public authority wishes to undertake or adopt.</p>			
	<p>As such, although screening may not be required under the 2000 Act, it may still be required under the European Communities (Birds and Natural Habitats) Regulations 2011, as amended, and careful</p>			

	<p>consideration should be given to those regulations in carrying out all relevant functions.'</p>			
	<p>We express concern that the omission of a site within the Natura 2000 network from the AA Screening may result in the plan having likely significant effects on the recently designated site.</p>	<p>The screening determination will be amended to include the additional site.</p> <p>The LACAP focuses on high level processes and actions which will be implemented subject to existing planning and environmental regulation structures. The NIR identifies the actions which have potential to interact with ecological pathways and provides mitigation measures to this effect. Considering the details of the North-West Irish Sea cSPA (site code 004236) it is identified that the environmental envelope previously</p>	<p>Update the AA Screening and associated determination to include details of the North-West Irish Sea cSPA (site code 004236).</p>	<p>Update the SEA ER to include details of the North-West Irish Sea cSPA (site code 004236).</p>

		<p>considered covers the ecological concepts required for the protection of this site. Therefore, there are no additional ecological considerations required and the North-West Irish Sea cSPA (site code 004236) will be added to the material considered within the final NIR for the plan.</p> <p>The AA process is not complete at this stage, and it will be clearly stated in the final NIR and subsequent determination that this site has been considered.</p>		
	<p>As such, The Draft Climate Action Plan 2024-2029 appears to be inconsistent with the requirements of S.I. 435 of 2004: European Communities (Environmental Assessment of Certain Plans and</p>	<p>The AA process is not complete at this stage, and it will be clearly</p>	<p>Update the AA Screening, associated</p>	<p>Update the SEA ER to include details of the</p>

	<p>Programmes) Regulations 2004, as amended by S.I. 200 of 2011: European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011, and in contrary to the requirements of Article 6 of the Habitats Directive 92/43/EEC and Regulation 42(1) of the European Communities (Birds and Natural Habitats) Regulations 2011-2015.</p>	<p>stated in the final NIR and subsequent determination that this site has been considered.</p>	<p>determination and NIR to include details of the North-West Irish Sea cSPA (site code 004236).</p>	<p>North-West Irish Sea cSPA (site code 004236).</p>
	<p>In addition, any potential effects on the North-West Irish Sea cSPA have not been screened or are not available/accompanying the Draft Plan for public consideration/scrutiny. In this regard, care should be taken to ensure compliance with the Aarhus Convention.</p>	<p>The Aarhus Convention is an international agreement that gives people the right to access information about the environment. It also promotes public participation in decision-making and provides access to justice on environmental matters.</p> <p>The environmental envelope being considered is clearly stated and available to the public. The implications for the North-West Irish Sea</p>	<p>None.</p>	<p>None.</p>

		<p>cSPA are addressed by the existing mitigation measures presented and the AA process is not yet complete.</p> <p>It is procedure to amend all plans, programmes and strategies after public consultation and update environmental reports as appropriate. There is no precedent to re-engage with the public after this process. The final assessments will be made publicly available (as per the Aarhus Convention) upon adoption of the LACAP.</p>		
	Comparative Analysis of other Local Authority Plan Appropriate Assessment Screening	Noted.	None.	None.

	<p>Naul Community Council would like to reference other plans carried out by the Local Authority in recent months which have sufficiently screened all relevant sites within the Natura 2000 Network.</p> <p>Some weeks ago, the Draft Fingal Heritage Plan was open for public consultation from Wednesday 23 August to Wednesday 04 October 2023.</p> <p>The Appropriate Assessment Screening undertaken in respect of the Draft Heritage Plan 2024-2030 by Brady Shipman Martin, dated 08/08/2023, references the North-West Irish Sea cSPA on page 27 of the AA Screening Report (see: https://consult.fingal.ie/en/consultation/draft-fingal-heritage-plan-2024-2030). As such, the plan had been adequately screened.</p> <p>The Draft Heritage Plan 2024-2030 factored in the Candidate SPA, despite the fact that the intent to designate (12/07/2023) by the Minister was made less than a month prior to the Appropriate Assessment Screening report being completed 08/08/2023.</p> <p>When comparing the Draft Heritage Plan 2024-2030 to the Draft Climate Action Plan 2024-2029, which had an Appropriate Assessment Screening Report prepared on 15/09/2023 (over two months after the Minister signalled his intent to designate the site), it is rather concerning that AA Screening in respect of the Draft Climate Action Plan 2024-2029 did not factor in all sites within the Natura 2000 Network, despite there being a greater period of time to do so, when compared to the period afforded to the Draft Heritage Plan AA Screening from the point the Minister notified of his intention to designate.</p>			
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<p>Naul Community Council commend the fact that the Draft Heritage Plan 2024-2030 was sufficiently screened within a limited timeframe from the point the intent to designate the site was made by the Minister, However, we express concern as to why the LACAP could not achieve sufficient AA screening within a greater time period (2 months from the Ministers declaration to designate the site).</p>			
<p>In this context, we cannot understand why there was any reason for the cSPA to be omitted from the AA Screening in respect of the Draft Climate Action Plan 2024-2029.</p>			
<p>If the Heritage Office, with limited resources/personnel can ensure the delivery of a sufficiently screened Draft Plan for public consultation within a limited timeframe, then there would appear to be no reason as to why the Environment, Climate Action and Active Travel Department, with greater resources/personnel and time, could not also deliver a sufficiently screened Draft Plan for consultation.</p>			
<p>Naul Community Council express some concern, as the aforementioned omissions/timelines may indicate potential issues with the impetus behind the delivery of the final LACAP 2024-2029 over the plan period. It is imperative that the ambition of the LACAP 2024-2029 is not compromised and that the plan's, objectives and goals are delivered in a timely fashion.</p>			
<p>Prioritisation of Projects under the Draft LACAP</p>	<p>The information presented is in keeping with the environmental considerations within</p>	<p>AA documentation will be updated appropriately prior to</p>	<p>The SEA documentation will be updated appropriately prior to</p>
<p>Given the omission of North-West Irish Sea cSPA for the draft LACAP 2024-2029 (see map below), issues arise as to how Actions have been identified for prioritisation within the Draft LACAP Plan.</p>			

<p>For example, projects which have a direct connectivity to/relationship with or likely influence on Natura 2000 sites, such as the new North-West Irish Sea cSPA or other European Sites may need to be prioritised owing to obligations under EU Habitats and the Water Framework Directive.</p>	<p>the existing NIR. There are no sources for effects or ecological receptors identified in this submission and the associated online material. Therefore, the concerns are noted – but will be clarified in the text of the final AA Screening and NIR as well as the associated Determination Statements from the local Authority.</p>	<p>publication of the LACAP.</p>	<p>publication of the LACAP.</p>
<p>As the cSPA has been omitted from the Draft LACAP and its Screening it raises the question as to whether the prioritisation of Actions within the LACAP has been done so in line with overarching European Obligations, such as those under the Water Framework Directive and emerging National Policy under the Draft Third Cycle River Basin Management Plan.</p>			
<p>An example of a project, which given the recent cSPA designation and recommendations within the Draft River Basin Management Plan, which may now need to be prioritised, is a new project which has become a Local GIM Objective adopted in the Fingal Development Plan this year:</p>			
<p>GIM31 - Prepare and implement wetland and river restoration project for Delvin River within the lifetime of this Development Plan in conjunction with local landowners and stakeholders. {As part of this project, consideration shall be given to address pollution of the Delvin River at Naul.}</p>			
<p>(Source: Page 242 of Fingal Development Plan 2023-2029 Appendices, https://www.fingal.ie/development-plan-2023-2029).</p>	<p>Noted. Consultation is currently underway.</p>	<p>None.</p>	<p>None.</p>
<p>(See reference to Delvin River under Draft River Basin Management Plan 2021-2027 Areas for Action here: https://www.gov.ie/pdf/?file=https://assets.gov.ie/199138/ed726b60-2e23-4e7b-aa08-dc1fa9ef3663.pdf#page=null).</p>			

<p>Given the relationship between this objective and the recently designated Natura 2000 site downstream, there is a greater onus on the LA to deliver this plan to achieve a more favourable WFD status of the river which discharges to a European Site, not least due to the fact the local objective is stated to be delivered 'within the lifetime of this development plan'.</p>			
<p>Naul Community Council requests that this objective is included in the Draft LACAP, as at present there is only one other Action proposed west of the M1 motorway in rural Fingal and there is a need to ensure equity and even distribution of actions within the LACAP across the geographical area of the county.</p>	<p>AA Screening Revision Required</p> <p>Given that a recent Natura 2000 Network site was designated, which now encompasses over 55% of Fingal's coastline, there is a need for the AA Screening to be revised so that plan is fully screened against impacts/effects on sites within the Natura 2000 Network.</p> <p>At present, it is unreasonable for the public to consider the plan which only screens sites encompassing less than half of the designated area of the county. The public must be equipped with all relevant information in order to make informed submissions on the Draft LACAP, given the societal challenges we face in a changing climate.</p> <p>In this regard, it would be helpful if maps of designated sites were also included in the screening reports, as at present these are omitted.</p> <p>Kind regards,</p>	<p>The AA process is not complete at this stage, and it will be updated accordingly all such information will be publicly upon adoption of the LACAP.</p> <p>AA documentation will be updated appropriately prior to publication of the LACAP.</p>	<p>The SEA documentation will be updated appropriately prior to publication of the LACAP.</p>

	Ian Lennon			
	Chairperson, Naul Community Council			
FIN-C629-16	<p>It seems that there has been an oversight in omitting the North-West Irish cSPA (site code 004236 North-west Irish Sea SPA National Parks & Wildlife Service (npws.ie)) from the Appropriate Assessment Screening, this needs to be addressed - see the submission by Naul Community Council</p> <p>Concern Draft Climate Action Plan is inconsistent with the Habitats Directive Fingal County Council Online Consultation Portal.</p>	<p>The AA process is not complete at this stage, and it will be updated appropriately. Accordingly, all such information will be publicly available upon adoption of the LACAP.</p>	<p>AA documentation will be updated appropriately prior to publication of the LACAP.</p>	<p>The SEA documentation will be updated appropriately prior to publication of the LACAP.</p>
FIN-C629-51	<p>We support Naul Community Council's request for inclusion of the North-West Irish cSPA (site code 004236) in the Appropriate Assessment screening as part of the Public Consultation, please include the Climate Change, Environment and Water Linkage Group of the Fingal PPN.</p>	<p>The AA process is not complete at this stage, and it will be updated appropriately. Accordingly, all such information will be publicly available upon adoption of the LACAP.</p>	<p>AA documentation will be updated appropriately prior to publication of the LACAP.</p>	<p>The SEA documentation will be updated appropriately prior to publication of the LACAP.</p>
FIN-C629-52	<p>The oversight in omitting the North-West Irish cSPA (site code 004236 North-west Irish Sea SPA National Parks & Wildlife Service (npws.ie)) from the Appropriate Assessment Screening, needs to be addressed - see the submission by Naul Community Council</p> <p>Concern Draft Climate Action Plan is inconsistent with the Habitats Directive Fingal County Council Online Consultation Portal.</p>	<p>The AA process is not complete at this stage, and it will be updated appropriately. Accordingly, all such information will be</p>	<p>AA documentation will be updated appropriately prior to</p>	<p>The SEA documentation will be updated appropriately prior to</p>

		publicly available upon adoption of the LACAP.	publication of the LACAP.	publication of the LACAP.
FIN-C629-53	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.	Noted.	None	None.
	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 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.	Noted.	None	None.
	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	The National Climate Action Plan (2023) and Sectoral Adaptation Plans have been considered in the SEA Process. The	None	None.

<p>(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>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>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 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>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 Plan are however mutually symbiotic and harmonious with the vision and measures defined in European Commission's Communication on the energy transition of the fisheries and aquaculture sector.</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-combination effects with Other Plans and Programmes</i>, and Appendix 2 - <i>Relationship</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 Cumulative Effect of the Draft LACAP in combination with other Plans and Projects</i>, and Appendix 1 - <i>Relationship of</i></p>

		Insofar as the local authority's remit extends, the plan supports the protection and enhancement of the marine environment. The climate action defined in the 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.).	<i>with other plans and programmes, as appropriate.</i>	<i>the Plan with other relevant Plans and Programmes, as appropriate.</i>
FIN-C629-22	The 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).	Noted and agreed. It is noted that the Draft SEA Environmental Report (ER) has defined Environmental	None.	None.

		Governance Principles and action amendment suggestions to ensure climate action co-benefit opportunities are maximized. Various defined mitigation measures serve to promote win-win solutions.		
	We recommend that the findings of the SEA ER and NIS are fully reflected in the Plan, to ensure that the relevant recommendations are fully considered and integrated as appropriate.	Noted and agreed. Environmental mitigation measures in the form of Environmental Governance Principles and climate action amendment suggestions have been fully integrated into the Plan itself.	None	None
	<p>Environmental Authorities Under the SEA Regulations, you should consult with:</p> <ul style="list-style-type: none"> • Environmental Protection Agency; • Minister for Housing, Local Government and Heritage; • Minister for Environment, Climate and Communications; • Minister for Agriculture, Food and the Marine. 	Noted. All listed Environmental Authorities have been consulted with as part of the SEA process.	None	None

	<p>Non-Technical Summary</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>It is assumed that SI No. 434 is a typo and SI No. 435 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>	None	Update the NTS to reflect the relevant information as required under Schedule 2 of SI No 435 of 2004 as amended.
	<p>Strategic Environmental Objectives</p> <p>We recommend that in considering strategic environmental objectives, they should where possible reflect the plan being prepared, rather than use more generic environmental objectives. This will help both in considering more specific monitoring and mitigation measures, when required.</p>	Noted. The Strategic Environmental Objectives defined have been very specifically defined to reflect the themes, goals, objectives and climate action contained in the plan and in light of the potential environmental effects associated with Plan implementation.	None	None
	Alternatives	Noted.	None	None.

	<p>We note the alternatives considered in the SEA and acknowledge the preferred option selected.</p>			
	<p>Mitigation Measures</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>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 accordance with these Environmental</p>	<p>None</p>	<p>None.</p>

		<p>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 LACAPs.</p> <p>Section 8 of the SEA ER provides full detail of these environmental mitigation measures.</p>		
	<p>Monitoring, Implementation & Reporting</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>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</p>	<p>None</p>	<p>Update the SEA monitoring programme to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects arising</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 06695-EPA-SEA-Statements-and-Monitoring-Report.pdf</p>	<p><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 Plan implementation.</p> <p>The monitoring programme has been designed to inherently measure cumulative effects that may arise due to the implementation of the 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</i></p>		<p>due to plan implementation.</p> <p>Provide additional detail on monitoring programme data sources</p>
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		<p><i>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 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 realization of all potential positive environmental effects, having regard to the</i></p>		
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		<p><i>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 detail on the indicators, targets and data sources to be used to monitor and measure progress. Some additional detail</p>		
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		<p>on data sources has 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>EPA State of the Environment Report</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/coordination 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</p>	Noted.	None	None

	commitment is made in the Plan, to take account of any relevant recommendations in the SOER 2024 report, once published, in implementing the Plan over its lifetime.			
	<p>SEA Statement – “Information on the Decision”</p> <p>Once the Plan is adopted, you should prepare an SEA Statement that summarises:</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Plan; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan; • The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the Plan. <p>You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.</p>	Noted. An SEA statement will be produced and circulated to any environmental authority consulted during the SEA process.	None	None
	<p>Future Amendments to the Plan</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>	Noted.	None	None
FIN-C629-72 (extracts	Can 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. The climate action plan could set a target of increasing the coverage of these locally	High-level detail on the baseline Biodiversity environment has	None	None

<p>relevant to SEA/AA)</p>	<p>important areas, or increase the number of them, and could set out a list of areas which could be considered for inclusion.</p>	<p>been provided in 4.3 of the SEA ER (relative to the focus of Plan action). Further baseline detail on Biodiversity sites in the local authority functional area is provided in the Fingal Biodiversity Action Plan.</p> <p>It is noted several Biodiversity related Strategic Environment Objectives (SEO) have been defined under the SEA Monitoring Framework presented in the SEA ER. For example:</p> <ul style="list-style-type: none"> • SEO B3 has a target to <i>'Increase linear metres of riparian corridor enhanced with native planting.'</i> 		
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		<ul style="list-style-type: none"> • SEO B5 has a target to <i>'Increase quantum of improved biodiversity areas.'</i> 		
	<p>We strongly endorse the environmental principles outlined in Table 7.1 of the plan. We believe these principles should be integrated into all of the Council's work. They should extend beyond the context of the draft Climate Action Plan in-so-far as they are interwoven into every aspect of the Councils work. Failing to do so may risk undermining climate action in work conducted outside the scope of this plan. It is essential to uphold these principles across all Council activities to ensure a consistent commitment to environmental sustainability.</p>	<p>This is noted. The Environmental Governance Principles defined in the Plan arose as a result of the SEA process to date.</p>	None	None

4.17 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 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
<p>Energy and Buildings: Action E8 pg. 45</p>	<p>Action E8 will be reworded as follows:</p> <p>Engage with independent BREEAM assessor and utilise Building Assessment Methodology throughout delivery of Swords Cultural Quarter flagship project; and extend the assessments under the various indicators from BREEAM and the Build Upon Energy Renovation Framework to Public Buildings. BREEAM is a leading validation and certification system for sustainable built environment.</p>	<p>SEA - This amended action provides clarification to the text previously considered. It clarifies the assessment's scope.</p> <p>This amendment will not introduce any significant environmental effects not already considered and mitigated against in the SEA process.</p> <p>AA - This amended action provides clarification to the text previously considered. It clarifies the assessment's scope.</p> <p>This amendment will not introduce any significant environmental effects not already considered and mitigated against in the AA process.</p>
<p>Energy and Buildings: Text pg. 42</p>	<p>Text on page 42 will be reworded to include the following.</p> <p>Proposed amendment: Although the revised programme provides for significant upscaling in the level of funding available; the Council is constrained by Government funding allocations in relation to social housing</p>	<p>SEA & AA - NA</p>

	<p>retrofits. The council responds to the level of Government funding that it receives in yearly allocations for social housing retrofit programmes. The council received €3,905,234 funding in the 1st two years of the current scheme. This resulted in the retrofit of 158 properties. A further 120 completed this 3rd year. Funding levels under this programme should increase annually to deliver a total of 36,500 social houses nationally, retrofitted to BER B2 or equivalent, by 2030. The council analyses and reports annually on retrofits completed and any funding constraints limiting the numbers of properties completed to meet targets.</p>	
<p>Energy and Buildings: Action E17 pg. 46</p>	<p>Action E17 will be amended as follows: Continue to make energy efficiency retrofits to social housing under the DHLGH-supported Energy Retrofit Programme. Ensure FCC's social housing stock has a B2 or cost optimal energy rating where feasible by 2030 (subject to programmes and funding support).</p>	<p>SEA - This amended action provides clarification to the text previously considered. It continues to support the local authority reducing its organisational GHG emissions.</p> <p>This amendment will not introduce any significant environmental effects not already considered and mitigated against in the SEA process.</p> <p>AA - This amended action provides clarification to the text previously considered. It continues to support the local authority reducing its organisational GHG emissions.</p>

		This amendment will not introduce any significant environmental effects not already considered and mitigated against in the AA process.
Action development text page 22:	Text on page 22 will be reworded to include the following: "Action review and development is one of the key building blocks of this Draft Plan. This has been an iterative process, - building on the successful implementation of the Climate Change Action Plan 2019 – 2024, and associated learnings. Teams aimed to develop SMART actions (Specific, Measurable, Achievable, Realistic, Timebound) and considered the full role of the Council, where the Council could influence, facilitate / co-ordinate, and advocate for climate action. Each action in the Climate Action Plan includes a tracking measure, and timeframe (for the completion of the action). "	SEA & AA – NA
Evidenced Based Climate Action: pg. 28	The Council will improve the legibility of the figures on page 28 of the draft Plan.	SEA & AA - NA
Nature Based Solutions: Action N16 pg. 79	Action N16 will be reworded as follows: Continue supporting the use of public allotments and community gardens as a way communities can grow their own food, and lower food miles and food waste.	SEA - This amended action provides clarification to the text previously considered. It supports the use of community gardens as well as the public allotments previously mentioned. A landuse framework for such open space is provided under the County

		<p>Development Plan, which has been subject to its own SEA and AA.</p> <p>This amendment will not introduce any significant environmental effects not already considered and mitigated against in the SEA process.</p> <p>AA - This amended action provides clarification to the text previously considered. It supports the use of community gardens as well as the public allotments previously mentioned. A landuse framework for such open space is provided under the County Development Plan, which has been subject to its own SEA and AA.</p> <p>This amendment will not introduce any significant environmental effects not already considered and mitigated against in the AA process.</p>
Change to NIR (AA)	Update the NIR to include details of the North-West Irish Sea cSPA (site code 004236).	NA
Change to SEA ER	Update the SEA ER to include details of the North-West Irish Sea cSPA (site code 004236).	NA
Change to NIR (AA)	Update the AA Screening and associated determination to include details of the North-West Irish Sea cSPA (site code 004236).	NA

Change to NIR (AA)	Reference will be made to the European Commission’s Communication on the energy transition of the fisheries and aquaculture sector in Section 3.4 - <i>In-combination effects with Other Plans and Programmes</i>, and Appendix 2 - <i>Relationship with other plans and programmes</i>, as appropriate.	NA
Change to SEA ER	Reference will be made to the European Commission’s Communication on the energy transition of the fisheries and aquaculture sector in Section 7.3 - <i>Potential Cumulative Effect of the Draft LACAP in combination with other Plans and Projects</i>, and Appendix 1 - <i>Relationship of the Plan with other relevant Plans and Programmes</i>, as appropriate.	NA
Change to SEA ER	Update the NTS to reflect the relevant information as required under Schedule 2 of SI No 435 of 2004 as amended.	NA
Change to SEA ER	Update the SEA monitoring programme to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects arising due to plan implementation. Provide additional detail on monitoring programme data sources	NA

Change to NIR(AA)	AA documentation will be updated appropriately prior to publication of the LACAP.	NA
Change to SEA ER	The SEA documentation will be updated appropriately prior to publication of the LACAP	NA
Chief Executive's Recommendation	<p>Actions E30 / E31 (pg. 48) will be reworded as follows:</p> <p>Work with SMEs in partnership with SEAI to promote energy efficient adaptations. Work with SMEs to promote energy efficient adaptations through the energy efficiency grant from LEO.</p> <p>Work with SMEs to promote energy efficient adaptations through Local Enterprise Office initiatives including Green for Business and the Energy Efficiency Grant. Tracking Measure: # of SMEs availing of Green for Business and the Energy Efficiency Grant</p>	<p>SEA - This amended action provides clarification to the text and scope previously considered. It supports energy efficiency through different initiatives.</p> <p>This amendment will not introduce any significant environmental effects not already considered and mitigated against in the SEA process.</p> <p>AA - This amended action provides clarification to the text and scope previously considered. It supports energy efficiency through different initiatives.</p> <p>This amendment will not introduce any significant environmental effects not already considered and mitigated against in the AA process.</p>
Chief Executive's Recommendation	<p>Action E32 (pg.48) will be reworded as follows:</p> <p>E32: Conduct research and develop case studies from into the Council's historic building stock that undertake consider pre-</p>	<p>SEA - This amended action provides clarification to the text previously considered. It is still a research action with no discernible environmental effect when considered in isolation.</p>

	<p>and post-works energy performance assessments and devise advice on appropriate and sensitive retrofitting/energy upgrading of traditional buildings to inform works to other Council-owned properties and to Guide private owners.</p> <p>Action E32 Tracking Measure will be amended to: # of advisory notes completed</p>	<p>This amendment will not introduce any significant environmental effects not already considered and mitigated against in the SEA process.</p> <p>AA - This amended action provides clarification to the text previously considered. It is still a research action with no discernible environmental effect when considered in isolation.</p> <p>This amendment will not introduce any significant environmental effects not already considered and mitigated against in the AA process.</p>
Chief Executive's Recommendation	<p>The new national Climate Action Plan 2024 was approved by Government on Wednesday 20th December 2023. Having regard to Section 1 Introduction of the Draft CAP, the following text is to be added:</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 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>	SEA & AA – NA

	<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. CAP24 includes the following local government specific climate actions:</p> <ul style="list-style-type: none">LG/24/1 - Adopt the Local Authority Climate Action PlansLG/24/2 - Develop Decarbonising ZonesLG/24/3 - Develop a monitoring and reporting system for the Local Authority Climate Action PlansLG/24/4 - Review and update the Climate Action CharterLG/24/5 - Roll out Phase 2 of the Smart and Sustainable Mobility Accelerator ProgrammeLG/24/6 - Support Cork and Dublin in the EU Climate - neutral and Smart Cities Mission <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>	
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	<p>This would result in the deletion of the following text on page 15 of the Draft Plan: The National Climate Action Plan 2023, launched on 21st December 2022, is the second annual update to the States' Climate Action Plan 2019, and the first to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021. It followed the introduction in 2022 of economy-wide carbon budgets and sectoral emission ceilings. Climate Action Plan 2023 (CAP23) sets out a roadmap to 2025 towards taking decisive action to halve emissions by 2030 and reach net zero, no later than by the end of 2050, as committed to in the Programme for Government.</p>	
Chief Executive's Recommendation	<p>The Regional Waste Management Planning Offices, RWMPO's, have prepared a Draft National Waste Management Plan for a Circular Economy, NWMPCE, which will be made in Q1 2024 and cover the period 2024 – 2030. Having regard to Section 1 Introduction of the Draft CAP, the following text is to be added:</p> <p>National Waste Management Plan for a Circular Economy</p> <p>The National Waste Management Plan for a Circular Economy has been prepared by the Local Government Sector arising from its</p>	SEA & AA – NA

	<p>obligations under the Waste Management Act. The Plan sets out a framework for the management of waste for the period 2024-2030 and adopts the ambition of 0% Waste Growth for every individual each year for the lifetime of the plan. The Plan sets out targets for the reduction of waste from households, businesses, and the construction sector and includes targets for improved compliance on the segregation of waste and the reuse and repair of materials.</p> <p>Core Policy 2 of the Plan relates to Climate Action and supports the delivery of the measures and actions prescribed in the Climate Action Plan to contribute to achieving the national climate targets.</p> <p>Circularity is a key driver of the National Waste Management Plan and is a common denominator across all sixteen focus areas in the Plan, with associated targeted policies and priority actions for implementation.</p> <p>The National Waste Management Plan for a Circular Economy is where circularity meets climate action and where the benefits of improved practices on waste prevention and management will contribute to the achievement of Ireland's climate targets over the coming years.</p>	
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	<p>The Plan was developed in collaboration with key partners and stakeholders and contains a range of key deliverables to ensure that the collaborative approach continues throughout the implementation phase of the Plan. The achievement of the priority actions set out in the plan will make a significant contribution to climate action and the co-ownership of the actions emphasises the contribution that all stakeholders must make.</p> <p>The implementation of the Plan will include continuous analysis of material flows and waste streams as key indicators for the achievement of the Plan ambition and targets and the Plan commits to an annual evaluation of the impact of the Plan on Circularity and Climate Action</p>	
Chief Executive's Recommendation	<p>Action R14 (pg. 87) will be reworded as follows:</p> <p>Implement measures under the Circular Cities Action Plan and Sustainable Fingal.</p> <p>Tracking measure will be amended to: Measures Implemented Review completed.</p>	<p>SEA - This amendment clarifies that the Sustainable Fingal Initiative will be incorporated into the scope of the action. This initiative is engagement based and will not give rise to real environmental effects in and off itself. The guidance provided by the Council under the initiative will serve to inform business sustainability improvement efforts.</p>

		<p>This amendment will not introduce any significant environmental effects not already considered and mitigated against in the SEA process.</p> <p>AA - This amendment clarifies that the Sustainable Fingal Initiative will be incorporated into the scope of the action. This initiative is engagement based and will not give rise to real environmental effects in and off itself. The guidance provided by the Council under the initiative will serve to inform business sustainability improvement efforts.</p> <p>This amendment will not introduce any significant environmental effects not already considered and mitigated against in the AA process.</p>
Chief Executive's Recommendation	<p>The following new action will be added to the Circular Economy and Resource Management Section of the Draft Plan (pg. 88):</p> <p>Reference: R14B</p> <p>Action: Broaden the scope of the Sustainable Fingal initiative to include businesses, communities and organisations, explore the concept of the circular economy, and lead on a Just Transition to Net Zero and a climate-resilient economy.</p> <p>Tracking Measure: Review Completed</p>	<p>SEA - This initiative is engagement based and will not give rise to real environmental effects in and off itself. The guidance provided by the Council under the initiative will serve to inform business sustainability improvement efforts.</p> <p>This additional action will not introduce any significant environmental effects not already considered and mitigated against in the SEA process.</p> <p>AA - This initiative is engagement based and will not give rise to real environmental effects in and off itself. The guidance provided by the Council</p>

	<p>Timeframe: 2024</p> <p>Mitigation/Adaptation: Mitigation</p> <p>LA Role: Full Accountability/Influence</p> <p>Lead Department(s): Economic, Enterprise, Tourism & Cultural Development</p>	<p>under the initiative will serve to inform business sustainability improvement efforts.</p> <p>This additional action will not introduce any significant environmental effects not already considered and mitigated against in the AA process.</p>
Chief Executive's Recommendation	<p>The following text will be added to the Safe Routes to School text in the draft Plan (pg. 55):</p> <p>As with all cycling and walking infrastructure projects, individual communications plans are prepared and executed for each Safe Routes to School project. These plans include communications to local residents and to the school community before delivery, during delivery and following completion.</p>	<p>This amendment clarifies the proactive community engagement and communication which will be undertaken before, during and after the delivery of Safe Routes to School projects. This amendment does not alter the potential environmental effects associated with Safer Routes to School projects that have been already considered under SEA and AA processes to date. It does not introduce any additional environmental effects not already mitigated against under the Plan.</p>
Chief Executive's Recommendation	<p>The following text will be added to the Conservation and Preservation text in the draft Plan (pg. 75):</p> <p>Wetland restoration projects are included in the Fingal Biodiversity Action Plan at the three estuaries, St Itas, Bog of the Ring and Garristown Bog.</p>	<p>This amendment clarifies the wetland restoration projects supported under the Fingal Biodiversity Action Plan 2022- 2030. This amendment does not alter the defined climate actions in the Local Authority Climate Action Plan, or the scope of potential environmental effects associated with these actions – which have been considered already under SEA and AA processes. The change does not introduce any additional environmental</p>

		effects not already mitigated against under the Plan.
Chief Executive's Recommendation	<p>Minor Text Changes</p> <p>The Chief Executive recommends a number of minor text changes to the Draft Plan. These include correction of typographical errors, clarifications and references.</p>	SEA & AA – NA
Chief Executive's Recommendation	<p>Minor Text Changes</p> <p>The Chief Executive recommends that where the Department Name 'Environment, Climate Action and Active Travel' or 'ECAAT' is mentioned that it is updated to 'Environment, Climate Action, Active Travel and Sports Department' or 'ECAATS'.</p>	SEA & AA – NA
Chief Executive's Recommendation	<p>Minor Text Changes</p> <p>The Chief Executive recommends that where the text mentions 'The National Waste Plan for a Circular Economy 2023-2029' it is updated to 'The National Waste Plan for a Circular Economy 2024-2030'</p>	SEA & AA – NA
Chief Executive's Recommendation	<p>Minor Text Changes</p> <p>A small number of actions may be renumbered as a result of action inclusion as per these recommendations.</p>	SEA & AA – NA

5 Conclusions

This Chief Executive's Report on the submissions received to the Fingal 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.

Elected Members will be briefed through a special sitting of the Climate Biodiversity and Environment SPC on the 31st of January 2024 to provide an overview of the Chief Executive's Report. The February 2024 Council Meeting of Fingal County Council must decide by resolution, whether to:

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

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

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

Resolution

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

A screening determination for the need for Strategic Environmental Assessment (SEA) has been made by Fingal 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, Fingal 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. Fingal 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 1: List of Persons, Organisations and Bodies who made Submissions.

Submission Reference	Name
FIN-C629-2	Blake Jensen
FIN-C629-3	Gareth Hickey
FIN-C629-5	Sean Macken
FIN-C629-6	Darren Brennan
FIN-C629-7	Anthony Donnelly
FIN-C629-8	Naul Community Council
FIN-C629-9	André Baumann
FIN-C629-10	ESB
FIN-C629-11	Holly McGowan
FIN-C629-12	André Baumann
FIN-C629-13	Gráinne Ryan
FIN-C629-14	Caoimhín Ó Ciaruáin -Department of Transport
FIN-C629-15	Pat O'Gorman
FIN-C629-16	Sustainable Skerries
FIN-C629-17	Liz Heffernan
FIN-C629-18	Global Action Plan
FIN-C629-19	Uisce Éireann
FIN-C629-20	Skerries Tidy Towns Committee
FIN-C629-21	Leisha Heffernan
FIN-C629-22	EPA
FIN-C629-23	Ecological Group Parish of Donabate, Portrane and Balheary
FIN-C629-24	Julie Flanagan
FIN-C629-25	Margaret Libreri
FIN-C629-26	Jean Farrelly
FIN-C629-27	Carmel Keeling
FIN-C629-28	Emilio Dettori
FIN-C629-29	John Chalkley
FIN-C629-30	Alan Lynch
FIN-C629-31	Sarah Kennedy
FIN-C629-32	Angela Donnolly
FIN-C629-33	Howard Smith
FIN-C629-34	Mairead Fitzsimons
FIN-C629-35	Gas Networks Ireland
FIN-C629-36	Mary Attridge-Jones
FIN-C629-37	LAWPRO
FIN-C629-38	William Dempsey
FIN-C629-39	Damien Carbery
FIN-C629-40	Annette Cashell
FIN-C629-41	Neil Cashell
FIN-C629-42	Neil Cashell

FIN-C629-43	Paul Gibson
FIN-C629-44	Community Gardens Ireland
FIN-C629-45	Community
FIN-C629-46	Gerald O'Halloran
FIN-C629-47	FingalOneFuture
FIN-C629-48	Ballyboughal Community Council
FIN-C629-49	Department of Housing, Local Government and Heritage
FIN-C629-50	Ballbriggan Sustainable Energy Community CLG
FIN-C629-51	Biodiverse Balbriggan
FIN-C629-52	Rush Tidy Towns
FIN-C629-53	Sea Fisheries Coordination DAFM
FIN-C629-54	Balbriggan Tidy Towns
FIN-C629-55	Fingal Chamber
FIN-C629-56	daa
FIN-C629-57	Irish Green Building Council
FIN-C629-58	Brid Feehily
FIN-C629-59	William Dempsey
FIN-C629-60	Jennifer Mahon
FIN-C629-61	Aoibhinn Tormey
FIN-C629-62	The Socratics Think Tank
FIN-C629-63	Edward Stevenson
FIN-C629-64	HSE Environmental Health
FIN-C629-65	Meath County Council
FIN-C629-66	Ciaran Cuffe
FIN-C629-67	Smart Balbriggan
FIN-C629-68	Sandra Shanagher- 2nd Year Climate Action Class in St. Finians Community College Swords
FIN-C629-69	Not Here Not Anywhere
FIN-C629-70	Siobhan Clifford
FIN-C629-71	Cllr Ian Carey
FIN-C629-72	Green Party (Cllr David Healy)
FIN-C629-73	Balrothery Community Association
FIN-C629-74	St Margarets Ward Residents Group- Liam O'Gradaigh
FIN-C629-75	Ian Lennon
FIN-C629-76	Fingal Active Travel Group
FIN-C629-77	Department of Environment, Climate and Communications

Note: Submission reference numbers FIN-C629-1 and FIN-C629-4 were tests and were not published.

Appendix 2: Public Notice of Draft Plan Public Consultation

NOTICE OF THE PREPARATION OF THE FINGAL COUNTY COUNCIL DRAFT CLIMATE ACTION PLAN 2024-2029

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

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

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

Public Consultation

The Fingal County Council Draft Climate Action Plan, the Strategic Environmental Assessment Environmental Report and Appropriate Assessment Natura Impact Report, will be on display from 9:00am on 20th September to 23:59pm on 3rd November 2023, at the following locations:

online at <https://consult.fingal.ie/>

- at County Hall, Main St, Swords, Co. Dublin (Postcode K67X8Y2) Monday to Thursday (excluding Bank Holidays) between the hours of 9am to 5pm and Friday 9am to 4:30pm.
Find Us here: [Contact Us | Fingal County Council](#)
- at Civic Offices, Grove Road, Blanchardstown, D15, (Postcode D15W638) Monday to Thursday (excluding Bank Holidays) between the hours of 9am to 5pm and Friday 9am to 4:30pm.
Find Us here: [Contact Us | Fingal County Council](#)

at the following Council libraries during normal opening hours, during the consultation period:

- Balbriggan Library
- Baldoyle Library
- Blanchardstown Library
- Donabate Portrane Library
- Garristown Library
- Howth Library
- Malahide Library
- Rush Library
- Skerries Library
- Swords Library

Find Us here: [Fingal Library Network | Fingal County Council](#)

Public consultation events will be advertised during the consultation period on www.fingal.ie.

Submissions/Observations

Written submissions or observations regarding the Draft Climate Action Plan, SEA Environmental Report and AA Natura Impact Report, are invited from members of the public and other interested parties. You can make a submission or observation between 9:00am on 20th September to 23:59pm on 3rd November 2023, through the following options only:

- A written submission can be made electronically through the Council's Public Consultation Portal <https://consult.fingal.ie/> between 9:00am on 20th September to 23:59pm on 3rd November 2023, **OR**
- In writing to the Climate Action Coordinator - Environment, Climate Action and Active Travel Department, Fingal County Council, County Hall, Main St, Swords, Co. Dublin (Postcode K67X8Y2).

The closing date for receipt of submissions or observations is 23:59pm 3rd November 2023.

Please make your submission or observations by **one** medium only i.e., online, **or** 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.

Fingal County Council's GDPR privacy policy is on the consultation portal and a hard copy of the policy will accompany hard copies of the draft Plan, where these are available.

Dated:

David Storey

Director of Service Environment, Climate Action, and Active Travel Department

Appendix X: SEA Screening Conclusion and Determination and AA Screening Conclusion and Determination

SEA Screening Conclusion and Determination

CE Order Reference ENV/0020/2024

COMHAIRLE CONTAE FHINE GALL

RECORD OF CHIEF EXECUTIVE'S ORDER

Modifications to the Draft Local Authority Climate Action Plan 2024 – 2029 for the Fingal County Council's 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

Fingal County Council has prepared a Draft Local Authority Climate Action Plan (LACAP) for the Fingal County Council's 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 Fingal County Council for the Modifications to the Draft LACAP under Directive 2001/42/EC. The screening assessment was carried out using the criteria for determining the likely significance of effects as set out in Schedule 1 of S.I. 435/2004, as amended.

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

CE Order Reference ENV/0020/2024

Catherine O'Donovan

Recommender Catherine O'Donovan

Senior Executive Officer

ORDER:

David Storey

Approver David Storey

Director Of Services

19/1/2024 Dated

thereunto empowered by order of the Chief Executive,
Fingal County Council C.E No 8682 delegating to me all
powers, functions and duties in relation to the Council of
the County of Fingal in respect of this matter.

AA Screening Conclusion and Determination

CE Order Reference ENV/0019/2024

COMHAIRLE CONTAE FHINE GALL

RECORD OF CHIEF EXECUTIVE'S ORDER

Modifications to the Draft Local Authority Climate Action Plan 2024 – 2028 for the Fingal County Council's 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

Fingal County Council has prepared a Draft Local Authority Climate Action Plan (LACAP) for the Fingal County Council's 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 20th September 2023 to Friday 3rd November 2023 and subsequent consideration by Fingal 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, Fingal 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.



CE Order Reference ENV/0019/2024

Recommender Catherine O'Donovan
Senior Executive Officer

ORDER:

David Storey

Approver David Storey
Director Of Services

19/1/2024 Dated

thereunto empowered by order of the Chief Executive,
Fingal County Council C.E No 8692 delegating to me all
powers, functions and duties in relation to the Council of
the County of Fingal in respect of this matter.