

Personal Submission on Draft Local Authority Climate Action Plan (LACAP)

My submission offers some general comments with respect to the LACAP. Climate change and action planning is a very challenging subject and I do not claim any particular expertise with respect to the subject matter. A successful outcome to Climate Action (net zero emissions by 2050) requires a collective global effort, with the international delivery of stated net-zero commitments by each jurisdiction, which is beyond the control of individual nation states.

Some context: The World Meteorological Organisation 'Provisional State of the Global Climate 2023' Report (WMO, 30th Nov. 2023) confirms that 2023 is set to be the warmest year on record with data (global mean temperature) up to the end of October showing that the year was about 1.40 degrees Celsius (with a margin of uncertainty of $\pm 0.12^{\circ}\text{C}$) above the pre-industrial 1850-1900 baseline. Furthermore, the UN Environment Programme Emissions Gap Report 2023 (UNEP, 20th November 2023) finds that current pledges under the 2015 Paris Agreement (legally binding treaty signed by 196 countries) put the world on track for a 2.5-2.9 $^{\circ}\text{C}$ temperature rise above pre-industrial levels this century – far above the 1.5 $^{\circ}\text{C}$ limit that would avoid the worst impacts of climate change. In addition, this report highlights that none of the G20 countries are reducing emissions at a pace consistent with their net-zero targets. It also notes that in spite of some progress in tackling Greenhouse Gas emissions since the 2015 Paris Agreement, predicted 2030 greenhouse gas emissions still must fall by 28 per cent for the Paris Agreement 2 $^{\circ}\text{C}$ pathway and 42 per cent for the 1.5 $^{\circ}\text{C}$ pathway.

The European Commission's 'Emissions Database for Global Atmospheric Research' (EDGAR, 2023 Report) which provides an independent estimate of greenhouse gases for each country worldwide since 1970, shows that global Greenhouse Gas (GHG) emissions reached 53.8 Gt CO₂eq (53.8 billion metric tons) in 2022 up from 50.1 Gt CO₂eq (50.1 billion metric tons) in 2015. For comparison, the EDGAR Report's estimate of Ireland's total national GHG emissions in 2022 is 62.4 million metric tons or 0.116% of the global total GHG emissions for that year (with County Galway GHG contributions being approximately 5% of the national emissions).

This context is important when reviewing the two main themes in the Draft LACAP 2024-2029 Plan – Climate Change Mitigation and Climate Change Adaptation – as all the evidence points to (a) significant Climate Change already 'locked-in' and (b) even if we are successful locally and at national level in delivering 2030 and 2050 emissions targets, there is a high risk that such success will not be replicated across the globe which could mean that local/national mitigation measures have almost zero impact on arresting climate change. In terms of the Climate Change Risk Assessment (CCRA) models considered in the LACAP this context indicates that we have already arrived at the RCP4.5 scenario and that we are on a trajectory that exceeds the ('very high emissions') RCP8.5 'worst-case' scenario.

The Draft LACAP, as constituted, is heavily biased towards Climate Change Mitigation actions (all welcome) and Galway County Council's leadership role in effecting these actions throughout its own organisation, where appropriate. Mitigation actions such as implementation of energy efficiency programs (upgrade of the public lighting system etc.) retrofitting the social housing stock, widespread stakeholder engagement and education

programs and general community supports via the Community Climate Action Fund are all to be lauded – but are likely to contribute modestly to reduction in CO2 emissions relative to the opportunities for reduction of emissions pertaining to the ‘big ticket’ items such as energy, transport and agriculture sectors which are national in scope and require cooperation of multiple agencies. With respect to Transport Actions (Actions TR 1.1 to TR 1.11) contained in the LACAP, that are within the control of Galway County Council, the actions described are vague and aspirational with respect to delivery of cycling networks and greenways. For example, successive County Development Plans have failed to make any significant progress on a Coastal Cycle route/greenway between Oranmore and Bearna (attempts at retrofitting a cycleway in Salthill appear to have been abandoned). This project (and other greenway projects) are the type of explicit mitigation actions that need to be delivered to facilitate the step-wise behavioural changes in the transport sector if the net-zero target is to be reached over the next 25 years.

With respect to adaptation measures, there are few explicit actions proposed in the LACAP which would reduce the risk to communities from Climate Change. Galway County has an extensive coastline that is vulnerable to rising sea levels, increased frequency and severity of Atlantic storms and the resulting flooding and erosion. In the LACAP’s Climate Risk Matrix – river flooding, coastal flooding and coastal erosion are recognised as future Climate Risk Hazards that will occur frequently and have a major impact. Yet there are no specific measures identified in the plan to address adaptations to these Climate Hazards

Some radical measures are required, in particular with respect to planning policies, that would prevent future generations being locked-in to much more costly adaptation measures – such as potential relocation of property and infrastructure away from coastal regions or floodplains (not mentioned in Objective EB2). A simple measure would be to prohibit any new property or infrastructure development within an appropriate coastal setback in all coastal areas and to zone coastal land accordingly. (Previous, County Development Plans & LAPs (Bearna, 2007) had included such measures as a prohibition of new development within “A minimum horizontal setback of 100m from the foreshore field boundary line for new development or along the 10m natural contour line, whichever is the greater” – that was before the topic of Climate Change had entered public debate. The LACAP claims that Climate action is integrated into “every chapter and strategy” of the current Galway County Development Plan 2022 to 2028 – yet this plan contains land zoned for new high-density development up to 30m (and below the 5m natural contour line) from the seashore.