



Comhairle Chontae na Gaillimhe
Galway County Council

CHIEF EXECUTIVE'S REPORT

Submissions Received during Public Consultation

on the draft Climate Action Plan 2024-2029

January 2024

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1. Introduction and Overview

1.1 Purpose of the Report

Galway County Council has prepared a draft Climate Action Plan. The draft Plan sets out 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. It includes a range of actions across the seven theme areas of Governance and Leadership, Energy and Built Environment, Transport, Communities and Enterprise, Circular Economy, Land Use and Green Infrastructure, and Adaptation to Climate Risk.

Pursuant to Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021, notice of the preparation of the draft Plan, was given on the 10th of November 2023. Submissions or observations with regard to the draft Plan were invited for a period of one month, from the 10th of November 2023 to the 11th of December 2023, inclusive. Submissions regarding the Environmental Report for Strategic Environmental Assessment (SEA) and the Appropriate Assessment (AA) Natura Impact Report were invited for a period of 6 weeks, from the 10th of November 2023 to the 22nd of December 2023, inclusive.

In accordance with the requirements of the Climate (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 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 the draft Plan Public Consultation is hereby submitted to the Elected Members of the Local Authority, for their consideration. The Elected Members have 4 weeks to consider this Chief Executive's Report, in accordance with the requirements of the Climate (Amendment) Act 2021. Elected Members will decide by resolution at the February Council Meeting, whether to:

- approve, or
- approve, subject to such modifications as they consider appropriate, the local authority Climate Action Plan.

NOTE: The Climate (Amendment) Act 2021 does not provide for a Material Amendments stage, by reason of the 12-month timescale and the relevant Plan making stages, as set out in

the Ministerial Guidelines. The Act does also not provide for the Elected Members ‘not’ approving the CAP.

Within thirty days (30) of the approval of the 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.

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

Environmental Reports accompany the draft Plan. The Environmental Reports contain detailed analysis of the draft Plan and how the implementation of the draft Plan would impact on its receiving environment. The Chief Executive’s recommendations as set out in this report, 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 was considered that the modifications proposed on foot of recommendations in this Chief Executive’s Report, would 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 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 was 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, would 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

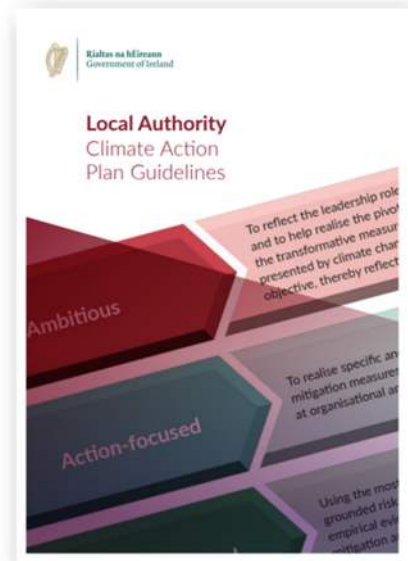
The Climate (Amendment) Act 2021 specifically requires all local authorities in Ireland to prepare and approve a Climate Action Plan, in consideration of wider national climate and energy targets, addressing both mitigation and adaptation measures. This draft Plan demonstrates a coherent approach to climate action across the administrative and political structure of the local authority.

The draft Plan sets a clear pathway for Galway 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 (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 Galway 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

The Local Authority Climate Action Plan Guidelines provides guidance on managing the process of developing the plan, inclusive of an iterative statutory plan-making phase. A significant programme of stakeholder engagement was undertaken in Spring and Summer 2023. The outcomes from the stakeholder engagement were integral to the development of the draft Plan.

Pursuant to Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021, the draft Plan underwent statutory public consultation from the 10th of November to the 11th of December 2023 (inclusive). The Environmental Report for Strategic Environmental Assessment (SEA) and the Appropriate Assessment (AA) Natura Impact Report underwent statutory public consultation from the 10th of November to the 22nd of December 2023 (inclusive).

The Climate (Amendment) Act 2021 states, that in making the local authority Climate Action Plan, a local authority shall:

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

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

- publish, in such manner as the local authority considers appropriate, a draft of the proposed local authority Climate Action Plan,
- 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
- have regard to any submissions made pursuant to, and in accordance with, a notice under paragraph (b).

2.2 Key Elements of the Public Consultation Process

The public consultation process involved the following key elements:

- a) Public notices were published in the Tuam Herald (8th and 22nd of November 2023) and the Connacht Tribune (10th and 24th November 2023) notifying members of the public that a draft Climate Action Plan and associated Environmental Reports would be on public display at the locations listed below from the 10th of November 2023.
 - Online at <https://consult.galway.ie/>
 - Galway Public Libraries - An Cheathrú Rua, Athenry, Ballinasloe, Clifden, Galway City, Loughrea, Oranmore, Portumna, Tuam
 - Galway County Council Offices, Áras an Chontae, Prospect Hill, Galway
- b) The public notice was issued to prescribed bodies, including government departments and other agencies, adjoining Local Authorities and other relevant stakeholders.

- c) Public consultation drop-in sessions were held in:

Location	Time and Date
Ballinasloe Library	November 14 th , 17:30 – 19:00
Clifden Library	November 16 th , 16:30 – 18:00
Tuam Library	November 18 th , 14:00 – 15:30
Loughrea Library	November 22 nd 17:30 – 19:00
Claregalway Hotel (Prior to Public Participation Network PPN Plenary)	November 28 th , 18:00 – 18:30
Comhairle na nÓg, Galway Bay Hotel	November 28 th , 11:00-14:00
Launch of GFI (Western Energy Agency)	December 7 th , 14:00-16:00

The purpose of the drop-in sessions was to inform the public and interested parties of the plan making process and to discuss/identify issues arising for consideration in the preparation of the draft Plan.

- d) Social Media channels (Facebook and Twitter) were used as mechanisms in promoting awareness of the draft Plan public consultation period. A webpage and a specific Public Consultation Portal were employed to keep members of the public up to date with the process of the preparation of the draft Plan. The majority of submissions received in relation to the draft Plan were via the consultation portal. All valid submissions received via the portal were published for public viewing on the portal.
- e) The PPN was notified in relation to the consultation on the 9th of November. The PPN December 2023 newsletter included information in relation to the draft consultation.
- f) Radio interviews were held with Galway Bay FM, Kinvara Radio and Radio na Gaeltachta, and print articles were published in the Galway Daily (online) and the Tuam Herald.

3 Details of the Submissions

3.1 Introduction

A total of 25 submissions and observations relating to the Climate Action Plan and the associated Environmental Reports were received, of which 22 were valid. There were three late submissions, which were not included in this analysis.

Valid submissions/observations submitted through the portal are available at [Galway County Council Draft Local Authority Climate Action Plan - Submissions | Galway County Council Online Consultation Portal](#). Valid submissions and observations were read, analysed and summarised. The summary of issues raised, together with the Chief Executive’s (CE) response and recommendations, and comments related to SEA/AA screening is contained in Section 4.

3.2 List of Persons, Organisations and Bodies who made Submissions / Observations

Author	Section of Plan/Topic
Environmental Protection Agency	3. Evidence Based Climate Action Environmental Reports
Department of Housing, Local Government and Heritage	Environmental Reports
Department of Agriculture Food and the Marine	Environmental Reports
Sea Fisheries coordination DAFM	4. Our Climate Actions
Uisce Éireann	1. Introduction
Renewable Gas Forum Ireland	4. Our Climate Actions
Tom Sampson	Executive Summary
Joyce Country and Western Lakes Geopark Project	1. Introduction 4. Our Climate Actions
Community Gardens Ireland	4. Our Climate Actions
Kinvara Climate Action	1. Introduction 4. Our Climate Actions
Galway County PPN GRWG	2. Climate Change Overview 4. Our Climate Actions
Dermot Corcoran	2. Climate Change Overview
Global Action Plan	4. Our Climate Actions 6. Implementation and Reporting
Comharchumann Fuinneamh Oileáin Árann Teo	5. Aran Islands Decarbonising Zone
Fair Seas Ireland	4. Our Climate Actions
Not Here Not Anywhere	4. Our Climate Actions
An Taisce / Green-Schools Ireland	4. Our Climate Actions
CELT	2. Climate Change Overview
Michael Gormally	4. Our Climate Actions
Third Space Galway	2. Climate Change Overview
Comhairle Ceantar na nOileán CTR	4. Our Climate Actions
Dr M Sheehy Skeffington	Foreword

Table 2: List of Persons, Organisations and Bodies who made Submissions or Observations

3.3 Chief Executive's Responses and Recommendations

The Chief Executive has prepared a response and recommendation to all valid submissions/observations.

This report examines issues raised in the submissions in the context of their relevance to the purpose and scope of the draft Climate Action Plan, clarifies issues in the context of the scope of the plan and 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 that:

- do not sit within the scope of the draft Local Authority 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 comment where appropriate and may not be considered further to help inform the provisions or actions of the final 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, land use plan reviews, etc. Matters that are considered helpful to frame future policy will be considered where such consideration does not undermine the integrity of the planning processes mentioned above.

All recommendations for amendments to the draft plan have been screened against SEA and AA and a comment has been provided to all relevant recommendations.

Minor amendments to the draft plan, such as grammatical or placename errors, are outlined in Section 4.3.

3.4 Structure of Proposed Modifications to the Plan

Amendments to the text of the draft Plan are identified by their location within the draft Plan i.e., Section 1 Executive Summary.

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

Furthermore, given the statutory twelve (12) month duration of the Plan making process, as set out in Section 16 of the Climate (Amendment) Act 2021, a Material Amendment public consultation phase, is not provided for under the legislation.

Non-material modifications to the text of the draft Plan are shown in **green text**. Deletions to the text of the draft Plan are shown as follows, in **red text with strikethrough**.

4 Categorisation, Summary and Responses to Issues Raised

This report takes the following format to address the issues raised in the submissions:

- 4.1 Submissions from Prescribed Environmental Authorities and Public Bodies
- 4.2 Submissions from the Public
- 4.3 Minor corrections to the text

4.1 Submissions from Prescribed Environmental Authorities

Submission by:	Environmental Protection Agency
Issues Raised/Relevant Chapter(s):	3. Evidence Based Climate Action Environmental Reports
Summary of Submission:	
<p>1. Monitoring</p> <p>1.1. Local Authorities need to ensure that there are sufficient suitable monitoring networks (that are maintained and producing high quality data at an appropriate resolution and frequency, to allow decision makers to make decisions on how to adapt. This could be flood defence related, making arrangements with respect to water resources, bathing water or issuing health warnings relating to hot weather, air particulates etc.</p> <p>1.2. Climate adaptation involves being able to make decisions when the climate effects are magnified. Local Authorities have a direct role in this with respect to water and air. Consider including a commitment to ensure that monitoring arrangements remain fit for purpose, such that that the data generated from monitoring, can be used by decision makers such as Local Authority emergency planning teams or Met Éireann flood forecasting teams. This could also be applicable to any future drought forecasting teams or for air pollution forecasting teams.</p> <p>1.3. Related to this, the monitoring data gathered provides validation of the climate change modelled projections, allowing future planning to bolster flood defence or have more adaptive water supplies in response to climate change.</p> <p>1.4. You should also consider taking into account the EPA's 'Climate Change in the Irish Mind' project in finalising the Plan. This research is part of the National Dialogue on Climate Action.</p> <p>1.5. The EPA suggest that the Plan include a specific action to carry out "implementation monitoring" to ensure that progress achieving the actions and measures across the Plan is being monitored and reported on.</p> <p>2. SEA/AA</p> <p>2.1. 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).</p>	

2.2. 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.

2.3. Environmental Authorities Under the SEA Regulations, you should consult with:

- Environmental Protection Agency;
- Minister for Housing, Local Government and Heritage;
- Minister for Environment, Climate and Communications;
- Minister for Agriculture, Food and the Marine.

Chief Executive's Response and Recommendation:

The CE welcomes the submission by Environmental Protection Agency.

Response:

1. Comment noted.

1.1. Flood Defence – Galway County Council will continue to work with the EPA and OPW to ensure that there is adequate flood related monitoring.

Drinking and Bathing Water - Galway County Council will continue to monitor and respond to issues that arise regarding drinking and bathing water in accordance with our obligations under the relevant regulations. Provision for the protection of private Group Water Schemes is outlined in Action AD1.8.

Issuing Health Warnings - Galway County Council will continue to work with the EPA in relation to the provision and maintenance of the air quality monitoring network to support the issuing of health warnings relating to hot weather or air particulates by the relevant authorities.

1.2. See Recommendation 1.2 below.

1.3. Comment noted.

1.4. This research was considered during the development of the draft Plan.

1.5. See Recommendation 1.5 below.

2. Comment noted.

2.1. The SEA has sought to support and identify co benefits particularly around actions relating to biodiversity, and resource management. The SEA has also provided for additional mitigation measures to support and promote nature-based solutions which can also provide co benefits. See for example additional mitigation under Actions LN 2.6 and AD 1.8.

2.2. The SEA and AA mitigation measures will be included in the final CAP and a commitment to implement and reference the SEA and AA is provided under the new Action of the CAP. *"In implementing this County Galway Climate Action Plan, ensure compliance with Galway County Development Plan 2022-2028 and local area plan objectives and policies relating to environmental management, the protection of statutory Conservation Areas and ensure compliance with specific environmental management measures relating to this plan. Landuse plans and projects arising from this Climate Action Plan will be underpinned by Strategic*

Environmental Assessment, Environmental Impact Assessment, Appropriate Assessment, and Ecological Impact Assessments as relevant."

2.3. Comment noted.

Recommendation:

1.

1.1 No proposed changes to draft Plan.

1.2 It is recommended that the following text is added after the last paragraph of Section 4.7: Galway County Council will endeavour to ensure monitoring arrangements and networks remain fit for purpose, such that that the data generated from monitoring, can be used by decision makers such as Local Authority emergency planning teams or Met Éireann flood forecasting teams, EPA air pollution forecasting teams, etc. subject to data sharing agreements.

1.3 No proposed changes to draft Plan.

1.4 No proposed changes to draft Plan.

1.5 It is recommended that the following text is inserted into Chapter 6.3:

To ensure that delivery is timely, the implementation of this Plan will be monitored via an in-house tracking system which will enable departments and sections to report progress made against the actions they are leading on. The reporting system will be managed by the Climate Action Team and all information reported will be collated by the team for the purposes of evaluation and reporting.

Progress will be reported to and reviewed by the Senior Management Team and SPC on a quarterly basis. On an annual basis progress will be communicated to the elected members of the Council. Additionally, where relevant, progress on key actions will be reported through the various methods available to the Council for example through the Monthly Management Report, SPCs, Galway County Council website and social media, to increase transparency and foster collaboration.

Galway County Council will in accordance with part 3(w) of the Local Authority Climate Action Charter, report quarterly/annually to the Department of the Environment, Climate and Environment on progress on climate action at local level as part of the delivery of the national climate objective. Progress on all actions will be reported via a reporting tool developed by CARO.

2.

2.1 No proposed changes to draft Plan.

2.2 No proposed changes to draft Plan.

2.3 No proposed changes to draft Plan.

Submission by:	Dept of Housing, Local Government and Heritage – National Monument Service and National Built Heritage Service
Issues Raised/Relevant Chapter(s):	SEA and NIR
Summary of Submission:	
<ol style="list-style-type: none"> 1. The Department recommends that the potential to spread invasive species is included as a key consideration in relation to Biodiversity, Flora and Fauna. Linear infrastructure projects such as active travel routes or electricity cable laying provide an opportunity for invasive species to spread over long distances. The control or management of invasive species should be undertaken in accordance with the two recent TII publications ‘The Management of Invasive Alien Plant Species on National Roads – Standard) and ‘The Management of Invasive Alien Plant Species on National Roads – Technical Guidance’. 2. Regarding the NIR, plan-level mitigation must be demonstrated to be effective in addressing and ameliorating the full range of any adverse effects on the conservation objectives and integrity of European sites that would arise from the plan, or that already exist and may be perpetuated or worsened by the implementation of the plan. Where there is reliance on mitigation measures from other strategies, the Council must ensure that this mitigation suffices and is up-to-date, particularly in respect of the location and extent of European sites, and the details of their conservation objectives, taking the current environmental baseline and pressures into account. Finally, Case law of the CJEU (Case C 258/11, Sweetman and others) has established that the assessment carried out under Article 6(3) cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of a plan/project on a European site. 3. On that note, the Department highlights the NIR refers to County Mayo throughout section 3.7, and also in Table 6.2 pg. 26 – 32 which includes specific reference to Mulranny in Co. Mayo. This should be clarified throughout. 4. Action TR 1. 9 – a recommendation to amend wording to “Expand the greenway network in the County establishing linkages with towns and villages in line with the strategic national cycle network and its associated mitigation and best practice requirements in the accompanying SEA ER and NIS”. 5. Finally, the SEA references actions NE1.8, NE 1.7, NE 1.3 and NE 1.5 in Annex A, assessment matrix. Clarity is required here as no other reference/detail can be found in relation to these. Archaeology 6. The Department welcomes the publication of local authority draft Climate Change Adaptation Strategy and would like to draw your attention to the Climate Change Sectoral 	

Adaptation Plan for Built and Archaeological Heritage (CCSAP) (2019) prepared as part of the National Adaptation Framework. The CCSAP identifies the priority impacts for the built and archaeological heritage based on current climate change projections. The Heritage Division of this Department is engaged with the local authorities through the departmental Climate Change Advisory Group and established Working Groups to ensure a consistent approach to protection and adaptation of heritage assets across the country and an alignment of policies, plans and actions across national, regional and local climate action. This Department anticipates ongoing engagement with the local authorities throughout the implementation of the current and future sectoral adaptation plans.

7. In the preparation and implementation of the local authority adaptation strategy, there are a number of issues regarding protection of built and archaeological heritage that this Department recommends be taken into account to identify the heritage assets at risk in its area, assess their vulnerability to climate change, increase their resilience and develop disaster risk reduction policies for direct and indirect risks. For example, it is recommended that the strategies should consider:
 - 7.1. 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;
 - 7.2. Including objectives to carry out climate change risk assessments, including condition assessments, for the historic structures and sites in its area;
 - 7.3. Including objectives to develop disaster-risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area;
 - 7.4. Including objectives to develop resilience and adaptation strategies for the built and archaeological heritage in its area;
 - 7.5. Developing the skills capacity within the local authority to address adaptation/mitigation/emergency management issues affecting heritage assets in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works.
8. This Department will shortly be publishing a new guidance document Improving Energy Efficiency in Traditional Buildings. This guidance will assist retrofitting installers and specifiers in how best to choose and apply energy efficiency measures to the historic building stock. The guidance is also intended to assist building owners and occupants in making decisions about upgrading their buildings, many of which are of architectural heritage significance. It is recommended that all proposed retrofitting projects undertaken or supported by the local authority to buildings of traditional construction should follow the principles and practice set out in that guidance.
9. Finally, it is recommended that, where such officers are employed, the Architectural Conservation Officer, Heritage Officer and Archaeologist should be included on the local authority's Adaptation Steering Group.

Chief Executive's Response and Recommendation:

Response:

The CE welcomes the submission by Dept of Housing, Local Government and Heritage – National Monument Service and National Built Heritage Service.

1. Invasive species. Section 4.3.6 and 4.3.7 of the SEA ER describes invasives species in terms of baseline and key issues. Notwithstanding this, the final SEA ER will be updated in relation to potential effects to highlight the particular risks associated with Linear transport projects and invasive species. Project level assessment and planning and consenting processes including application of key environmental protection measures in the Galway County Development Plan 2022 -2028 including *IS 1 Control of Invasive and Alien Invasive Species It is a policy objective of the Planning Authority to support measures for the prevention and eradication of invasive species and IS 2 Invasive Species Management Plan Ensure that proposals for development do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are currently or were previously present, an invasive species management plan will be required. A landscaping plan will be required for developments near water bodies and such plans must not include alien invasive species* as well as TII guidance as appropriate. Training on Biosecurity Best Practice is already carried out for staff and will be included in the training programmes developed under Action GL 1.2.
2. The NIR of the draft CAP has been completed with regard to the European Commission (EC) guidelines "Assessment of Plans and Projects in Relation to Natura 2000 sites – Methodological guidance on Article 6(3) and (4) of the Habitat Directive 92/43/ECC. With regard to the assessment of plans this guidance document notes that plans, where the location and design of all their main components are not yet decided, it may only be possible to identify potential effects of certain actions or components of the plan at a general level...". The actions of the draft Plan do not provide details of the location and design of the specific actions that have been identified as having the potential to result in land use activities. The EC guidance goes on to say that possible broad mitigation measures should be identified.
 - The scope of the actions set out in the draft Plan are at the County level and the land use activities that could arise as a result of these actions are similar to those that have been identified for the Galway County Development Plan.
 - It is considered that the broad mitigation measures that have been identified in the Galway County Development Plan with respect to any future land use activities facilitated by the draft Plan along with the mitigation measures incorporated in the draft Plan (both of which are set out in the NIR) will provide the necessary safeguards to protect European Sites from any potential future impacts that could arise as a result of land use activities facilitated by the draft Plan. It is further considered that these mitigation measures are in keeping with the mitigatory requirements for plans, such as the draft Plan, as set out in the above referenced EC guidance.

3. Reference to county Mayo will be corrected in advance of the final NIS.
4. Action TR 1.9 – their suggested wording was included in the SEA ER NIS and draft Plan prior to consultation.
5. Clarification will be provided re Actions in Annex A.
6. Comment noted.
7. Actions as suggested are addressed in part under Actions AD 1.1. It is proposed to update this action to reflect this advice as per recommendation below. Issues relating to identification of sites and developing of skills capacity is dealt with under the Galway County Council Heritage and Biodiversity Plan.
8. Comment noted. This issue is addressed under Action EB 2.2.
9. The Heritage Officer is on the Climate Action Team. The Architectural Conservation Officer post is currently vacant and there is no Archaeologist post within Galway County Council.

Recommendation:

1. No proposed changes to draft Plan, SEA ER will be updated as outlined above.
2. No proposed changes to draft Plan, NIR will be updated as outlined above.
3. No proposed changes to draft Plan, NIR will be corrected prior to final report.
4. No proposed changes to draft Plan, Action TR 1.9 was already updated to include the SEA and NIR mitigation text as follows: Action TR 1. 9 Expand the greenway network in the County establishing linkages with towns and villages in line with the strategic national cycle network and best practice requirements in the accompanying SEA ER and NIS.
5. No proposed changes to draft Plan, Annex A of the SEA ER will be corrected and clarified in Final SEA ER.
6. No proposed changes to draft Plan.
7. Amend Action AD 1.1 as follows: - Collaborate with OPW and other relevant stakeholders in assessing the likely impacts of climate change, including sea level rise, coastal erosion and flooding, on the built environment and heritage sites. Prioritise areas for further assessment and seek funding/support to mitigate the risk. Assist CARO in the development of a register of critical infrastructure, systems and assets at risk from existing and projected climate events.
KPI - Assessment Complete. Register Developed. Areas prioritised. Funding sought. Projects implemented.

8. No proposed changes to draft Plan.

9. No proposed changes to draft Plan

Submission by:	Department of Agriculture, Food and the Marine
Issues Raised/Relevant Chapter(s):	Climate Change Adaptation on Farms

Summary of Submission:

1. In relation to adaptation and the potential effects of climate change on Agriculture, there are a number of measures that can be applied to build resilience, many of which can also have benefits from a mitigation perspective:

Pasture based livestock production dominates Irish agriculture and our agriculture sector has a reputation for high quality and sustainably produced food. Maintaining and verifying that reputation is an imperative for our agri-food industries. Ireland is already well placed through the success of the Origin Green programme and can maintain and build on this competitive advantage, provided changes are made over the years ahead to enhance the sector's environmental credentials. On the mitigation side a number of actions have been taken to reduce the use of chemical fertilizers and promote the uptake of protected urea, these measures will impact on nitrous oxide emissions. Further improvements in efficiency, including reducing the age at slaughter and the age of first calving will reduce GHG emissions. New targets for organic farming and tillage production will have further significant impact on GHG emission from Agriculture. Further diversification options will also be available through the development of a national biomethane strategy and the construction of an Anaerobic Digestion industry, which will not only benefit the Agriculture sector, but will also have a significant impact on emission from the Energy sector. The DAFM Forest Strategy offers an opportunity to farmers to engage in forestry creation at all scales from tree planting as part of the Agri-Climate Rural Environment Schemes to large scale planting and native woodland creation.

The national Climate Action Plan contains a number of actions that will reduce GHG emissions, however there will also be significant benefit to biodiversity and enhance adaptation. In relation to adaptation and the potential effects of climate change on Agriculture, there are a number of measures that can be applied to build resilience, many of which can also have benefits from a mitigation perspective. Maintaining a fodder reserve on farm can address the effects of longer and wetter winters as well as poorer weather conditions in spring at the start of the grazing season. The Teagasc advisory service and private Agricultural Consultants are available to provide the appropriate advice to farmers. Diversification in agricultural systems will increase resilience of farms to climate change and reduce the economic risk. Changes in climate can encourage an

increase in exotic pests and diseases including invasive species - which would have a negative impact on biodiversity if measures to promote resilience are not put in place. Equally, warmer and wetter climatic conditions encourage increased disease pressure in livestock, for instance an increased prevalence of liver fluke.

2. Creating further resources to harbour and restore biodiversity improve resilience to climate change. The planting of trees and forestry can contribute to carbon sequestration, and biodiversity by providing a more diverse ecosystem to build resilience. Improvements in soil structure, management and health by increasing soil organic carbon will enhance water holding capacity beneficial for drought conditions as well as high rainfall events. Peatland restoration will also improve water holding capacity as well as water quality.
3. As Local Authorities continue to finalise their 5-year Climate Action Plans, DAFM would request that the above policies, strategies and measures be taken into consideration to ensure that Ireland's reduction targets for agriculture and land use are fully supported. DAFM remains available to support Local Authorities in the development of their draft Plans and other agriculture related items.

Chief Executive's Response and Recommendation:

Response: The CE welcomes the submission by DAFM in relation to climate resilience.

1. Comment noted. Actions LN 1.1, LN 1.2, LN 1.3, LN 2.1 and LN 2.3 support the Department's comments.
2. Comment noted. Actions LN 1.1, LN 1.2, LN 1.3, LN 2.1 and LN 2.3 support the Department's recommendations.
3. Comment noted.

Recommendation:

1. No changes to Climate Action Plan.
2. No changes to Climate Action Plan.
3. No changes to Climate Action Plan.

Submission by:	Sea Fisheries Coordination DAFM
Issues Raised/Relevant Chapter(s):	4. Our Climate Actions
Summary of Submission:	
<ol style="list-style-type: none"> 1. 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. 2. 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. 3. Our coastal communities and maritime sectors will continue to play a significant role in contributing to our climate goals and will continue to be consulted and supported in the transition to carbon neutrality. The seafood industry, through both the Sectoral Adaptation Plan (Agriculture, Forest and Seafood Climate Change Sectoral Adaptation Plan) and the annual Climate Action Plan (CAP23) continue to support initiatives to improve understanding of our marine area and ensure sustainable resource use, including through bio and circular economy initiatives. These plans require consideration in the SEA process. 4. 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. 5. Local authorities should include relevant steps to support a Just Transition for the sea fisheries and aquaculture sectors in their Climate Action Plans. 	

Chief Executive’s Response and Recommendation:**Response:**

The CE welcomes the submission from the Sea Fisheries Coordination Unit in DAFM.

1. Comment noted.
2. Comment noted.
3. Comment noted.
4. Comment noted.
5. As noted in Section 1.8 of our draft Climate Action Plan, “supporting a just transition is a core element of this Plan, from the high-level mission statement through to the specific actions.” “Galway County Council are committed to working with partners and communities to support a just transition. A just transition can mean new jobs, new skills, new investment opportunities, and the chance to create a more productive and resilient economy.” The Mission Statement and actions related to Just Transition are applicable to all industries, including the Sea Fisheries and Aquaculture Sectors.

Recommendation:

1. No proposed changes to draft Plan.
2. No proposed changes to draft Plan.
3. No proposed changes to draft Plan. The Strategic Environmental Assessment Environmental Report will be updated to include references listed.
4. No proposed changes to draft Plan. The Strategic Environmental Assessment Environmental Report will be updated to include references listed.
5. No proposed changes to draft Plan.

Submission by:	Uisce Éireann
Issues Raised/Relevant Chapter(s):	1. Introduction
Summary of Submission:	

The submission comments on the public water services. The following observations and comments have been provided:

1. In line with the Water Services Bill 2022, Irish Water is now known as Uisce Éireann from January 2023 and has the full responsibility for the delivery of all public water services in Ireland. We would therefore request that any references in the plan to Irish Water be changed to Uisce Éireann.
2. Impact of Climate Change on water resources and infrastructure:
 - Sustained periods of low rainfall and warm temperature may impact our ability to sustainably abstract and supply water.
 - reduced flows in receiving waters due to extended dry periods, will reduce the available assimilative capacity for treated wastewater.
 - more intense rainfall and greater frequency of storm events will result in more frequent flooding due to the capacity of the wastewater network being exceeded and greater environmental impacts from storm water overflows. It is important local policy supports and promotes the widespread adoption of blue-green infrastructure in our towns and cities together with innovative nature-based solutions to help ensure climate resilient water services.
3. Sustainable Urban Drainage and Integrated Urban Wastewater Management Plans
 - 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, improve water quality, provide more livable spaces 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 UE.
 - 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.
 - In this regard we welcome Action AD 1.3, to “ensure the continued incorporation of Flood Risk Management and Climate Change Sectoral Adaption Plans into the spatial planning of the County, having due regard to the need to promote nature based solutions and Sustainable Urban Drainage Systems (SuDs), and environmental sensitivities at these locations” and we also welcome Action LN 3.1, to “Ensure all LA-led projects consider nature-based solutions including building for biodiversity as appropriate”.
 - We would welcome in particular consideration of the following guidance:
 - 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 NGSG Circular 1 of 2023,
 - 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.
 - the proposed recast Urban Wastewater Treatment Directive (UWWTD). If adopted, the new UWWTD will require collaboration between UÉ and LAs on integrated drainage planning including the preparation of Integrated Urban Wastewater Management Plans (IUWWMPs) which must include both wastewater and urban runoff drainage systems.
4. Water Demand: Uisce Éireann would welcome water use efficiency to be included as an objective/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.
 5. Energy Efficiency: Uisce Éireann 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.
 6. Circularity & Bioeconomy: Action DZ 1. 4 Support Irish Water to identify baseline emissions related to water delivery and treatment, update baseline emissions assessment and identify opportunities to reduce associated emissions. Assess risks related to drought conditions. Consider advanced anaerobic digestion followed by reuse of the residual biosolids on land to be the most sustainable solution for wastewater sludge treatment and disposal. Uisce Éireann are eager to collaborate with others in leveraging circularity opportunities to support the development of a sustainable bioeconomy model.

Chief Executive’s Response and Recommendation:

Response:

The CE thanks Uisce Éireann for the detailed and informative submission and remains committed to ongoing constructive engagement.

1. Comment noted, all references to Irish Water have been removed from the draft Plan.
2. There are a number of actions within the draft Climate Action plan that supports and promotes the widespread adoption of blue-green infrastructure in our towns together with innovative nature-based solutions to help ensure climate resilient water services including Action LN 1.3, LN 3.1, AD 1.2, AD 1.3, AD 1.6, AD 1.7, EB 2.1, Objective LN3. These issues are also addressed in other Galway County Council plans and policies including the County Development Plan 2022 – 2028.
3. Comment noted. As noted above, there are a number of actions within the draft Climate Action plan that supports and promotes the widespread adoption of blue-green

infrastructure in our towns together with innovative nature-based solutions to help ensure climate resilient water services. These issues are also addressed in other Galway County Council plans and policies including the County Development Plan 2022 – 2028.

4. Comment noted. There are a number of actions related to education with the draft Climate Action Plan including GL 3.1, CP 1.2, CP 1.3, CP 1.5, CP 1.10, CP 1.12. It is envisaged that any education programme developed will cover a wide range of actions including water conservation, energy management, habitat creation and waste management as noted in action GL 3.1.
5. Comment Noted. Galway County Council would welcome the opportunity to explore potential collaboration in relation to district heating.
6. Comment Noted.

Recommendation:

1. It is recommended that the following text is amended:
 - Action EB 3.1 The provision of public Waste Water Treatment Plants in towns and villages that are not currently served is vital to facilitate compact and sustainable growth. Support ~~Irish Water~~ Uisce Éireann and the national government to prioritise locations and seek funding for provision of these services.
 - Action DZ 1. 4 Support ~~Irish Water~~ Uisce Éireann to identify baseline emissions related to water delivery and treatment, update baseline emissions assessment and identify opportunities to reduce associated emissions. Assess risks related to drought conditions.
2. No proposed changes to draft Plan.
3. No proposed changes to draft Plan.
4. No proposed changes to draft Plan.
5. No proposed changes to draft Plan.
6. No proposed changes to draft Plan.

4.2 Submissions from the Public

Submission by:	Renewable Gas Forum Ireland
Issues Raised/Relevant Chapter(s):	Our Climate Actions
Summary of Submission:	
<p>1. County Councils should accommodate agri-based biomethane production, at scale, within LA strategic priorities to support renewable energy, decarbonisation, climate action, the circular bioeconomy, and biodiversity. The potential for large scale biomethane production to significantly help achieve legally binding decarbonisation and sectoral targets has been fully recognised by Government over the past year.</p> <p>Sustainable Biomethane production has now been identified by the Government of Ireland as one of the essential and key measures within the 2023 Climate Action Plan, with a target to build 150-200 AD plants (at least 20GWh scale) across rural Ireland by 2030 producing up to 5.7 TWh (~0.58 bcm) of biomethane. The National Biomethane Strategy, with related supportive measures, is currently being finalised by the Government of Ireland.</p> <p>2. They welcome Objectives EB1 and EB2 within the draft Plan. It will be important, however, to ensure that sustainable biomethane production is specifically listed in EB1 “to support the development of renewable energy sources, such as wind, solar, tidal, biomass including agri-based biomethane, in suitable locations”</p> <p>3. It will also be essential to include AD biomethane plants on farms when spatial planning is being considered within EB2: <i>“Ensure the integration of climate action in spatial planning to enable the County of Galway to transition to a low carbon and resilient society.”</i></p> <p>4. They would welcome further engagement / collaboration with the Council and would be pleased to present the opportunities for the Galway region in biomethane production to you, your team and or local representatives at the earliest opportunity.</p> <p>5. The agri-based AD biomethane, green energy model, not only tackles climate change, but also sustains farms, sustainable food production and the circular, rural bioeconomy, creating and sustaining c 3,000 rural jobs; benefits water and air quality, soil regeneration (carbon sequestration and soil structure) and biodiversity; can empower community based renewable energy initiatives; supports local, national and EU frameworks, policies and strategies. However, reaching the 5.7TWh target for biomethane production requires AD plants to be built on farms across the country, as soon as possible, with associated opportunities for County Galway.</p> <p>6. County Councils have a central role to play in removing barriers and facilitating this sector to flourish, not only through the County Council Climate Action Plans, but also County Development Plans and the various functions under Council responsibility,</p>	

especially Planning. We ask that you ensure that the role of agri-based AD biomethane production is understood and embedded across the council's functions.

7. While provision for the development of urban based anaerobic digestion plants already features in many county development plans, there is now an urgent need to consider the requirements for larger scale (20GWh), on-farm, agri-feedstock based systems, across the Council's responsibilities.
8. All statutory authorities have a role to play in facilitating the transition to zero carbon and RGF's and the food industry's requests and recommendations to the County Council are as follows: County Plans, such as the Development Plan and Climate Action Plan, should provide for the development of medium – large scale, agri-feedstock, on-farm and community-led AD biomethane and bio-fertiliser projects.
9. Agri-based renewable AD biomethane production should be listed amongst the renewable energy opportunities within the county. Policies and plans should include on-farm as well as publicly owned and urban land to support initiatives for climate adaptation and mitigation and to limit emissions of greenhouse gases. Renewable energy technologies and industries that create and employ green technologies and take measures to accelerate the transition towards low carbon and circular bio-economies, should be facilitated.

Industries and business, including farms and agri-businesses, seeking to generate renewable energy off grid and injecting biomethane into the national grid, should be supported, primarily by taking a positive approach to planning applications, subject to compliance and best practices with location, design and environmental considerations. These could potentially be considered as an indigenous industry and business start-up in rural employment centres and on farms.

This support should include specific allowance for the optimum size of 20GWh anaerobic digestion plants, an essential requirement to the development of agri-based biomethane and biofertiliser production. Strategic Energy Policy Areas, suitable for larger, renewable energy and bio-economy projects, community and micro energy production, should take into account the need for agriculture feedstock based 20GWh plants, to develop a sustainable biomethane and bio-fertiliser industry.

10. Communities should be empowered and their capacity increased, through biomethane and biofertiliser production. Local carbon planning and local energy production options should be developed in collaboration with Renewable Gas Forum Ireland and Community Power. Biomethane should be considered in the context of district heating, as one of the most efficient and cost-effective ways to heat apartments, homes and mixed-use developments.
11. Gas Networks Ireland should be included in relevant consultations as a key infrastructure stakeholder. The high quality and modern national gas infrastructure

already in place is one of our great national assets and provides a unique opportunity for green energy and employment.

12. Address the fundamental need for energy security, storage and stable energy prices for consumers.

Chief Executive's Response and Recommendation:

Response:

The CE thanks Renewable Gas Forum Ireland for the detailed and informative submission.

1. Comment noted.
2. Comment noted. As highlighted in the draft Plan and in particular in Objective EB 1, Action EB 1.1 and Action CE 1.1, Galway County Council recognises the importance of the circular economy and the development of renewable energy sources. Policy Objectives in relation to individual technology types including agri-based biomethane are set out in detail in the County Galway Local Authority Renewable Energy Strategy (LARES) which was adopted as part of the Galway County Council County Development Plan 2022-2028. The LARES recommends that *"Bio-Energy and Bio-Mass should be supported by policy and should be open for consideration in all areas - subject to compliance with all other statutory requirements."* It is not proposed to set out further detail in relation to spatial planning in the draft Climate Action Plan as it is more appropriate to address this under the County Development Plan. We would welcome further engagement / collaboration in relation to this issue.
3. Comment noted. Policy Objectives in relation to individual technology types and developments including agri-based biomethane are set out in detail in the County Galway Local Authority Renewable Energy Strategy (LARES) which was adopted as part of the Galway County Council County Development Plan 2022-2028. Action GL 1.2 *Build expertise within the GCC Management Team, Climate Action Steering Group, Climate Action Team, Energy Team, Climate Ambassadors, Elected Members and Staff by identifying training needs and organising relevant training* relates to the training of staff in relation to Climate Action and will include information on potential renewable energy sources including biomass.
4. We would also welcome further engagement / collaboration in relation to this issue when implementing Action EB 1.1 and developing training plans under Action GL 1.2.
5. Policy Objectives in relation to individual technology types and developments including agri-based biomethane are set out in detail in the County Galway Local Authority Renewable Energy Strategy (LARES) which was adopted as part of the Galway County Council County Development Plan 2022-2028. It would not be appropriate to set out spatial planning requirements with the draft Climate Action Plan.

6. Comment noted.
7. As noted above it would not be appropriate to set out spatial planning requirements with the draft Climate Action Plan.
8. We would also welcome further engagement / collaboration in relation to this issue when implementing Action EB 1.2 *Conduct a feasibility study to identify and assess the potential areas and sources for district heating in the county.*
9. Comment noted.
10. Galway County Council aims to support this ambition within its remit.
11. Comment noted.
12. Comment noted.

Recommendation:

1. No proposed changes to the draft plan
2. No proposed changes to the draft plan
3. No proposed changes to the draft plan
4. No proposed changes to the draft plan
5. No proposed changes to the draft plan
6. No proposed changes to the draft plan
7. No proposed changes to the draft plan
8. No proposed changes to the draft plan
9. No proposed changes to the draft plan
10. No proposed changes to the draft plan
11. No proposed changes to the draft plan
12. No proposed changes to the draft plan

Submission by:	Tom Sampson
Issues Raised/Relevant Chapter(s):	Executive Summary
Summary of Submission:	
<p>As a flood risk and environmental consultant my focus is on climate adaptation and resilience.</p> <ol style="list-style-type: none"> 1. The climate action plan should more explicitly separate the different type of climate impacts. For example, adaptation to general change in climate that affects everyday activities such as drain and active travel maintenance so it's easy to walk and cycle. And consider separately adaptation to big events such as flooding. 2. Can the council guarantee that on the day the plan is adopted it will commit the resources to progress all actions in line with the proposed timetable? Given the urgency this is essential. 3. The plan contains many actions to move towards climate resilience and a just transition, but no actions that are meaningful in the form of achieving a measurable change in resilience. The plan itself contains no indicators for what constitutes resilience. Meaningful indicators are essential for monitoring outcomes and effectiveness of actions. 4. The plan needs to clearly state who has responsibility for managing climate hazards to different infrastructure and how multiple agencies and landowners will be made to work together. The council alone cannot manage all adaptations. Such as, responsibility for managing increased surface water volume that may drain from roads into combined sewers. 5. We know that key local roads flood now and can cause access issues. Why not have specific actions to investigate feasibility of options to manage these known issues? 6. Objective EB2 Ensure the integration of climate action in spatial planning to enable the County of Galway to transition to a low carbon and resilient society. This objective has no actions to ensure council activities, policies, plans and activities maximise resilience to climate change. New projects should be subject to a climate vulnerability and risk assessment to ensure the investment is resilient and adaptive to climate change, and most importantly that they do not lock-in society and generations into a less resilient or costly to adapt solution. The available evidence (both modelled and observed) shows many access and egress routes for zoned land is at significant flood risk in future climate scenarios in Oranmore and Maree. Examples include the Garraun area of Oranmore of which many zoned lands (and recently constructed estates) are dependent upon access from the coast road. The county development plan is therefore not climate resilient without amendment. 	

There are alternative access points that would avoid climate change flood risks, but these require connection to neighbouring lands and possibly existing estates. How will this connectivity be ensured if the council has no power to connect streets, active travel and other infrastructure? So Alternatively, the council needs to progress explicit projects to ensure access routes are safe from future flood risk.

7. Objective TR 1 Support active travel and modal shift to advance sustainable, accessible, and safe mobility. The actions under this objective are welcome and well considered. Especially the requirement to maintain infrastructure for active travel. There should be an additional action to implement sustainable drainage system (SuDS) retrofit to ensure effective drainage and treatment of road runoff, and separation of foul and surface water sewer networks. Such a measure would respond to the projected increase in all types of flooding. It would also contribute towards managing the secondary impact from increased combined sewer overflows with increased pluvial flood frequency.
8. Objective LN 3 Support nature-based solutions to mitigate against and adapt to climate change and provide additional co-benefits. There is limited ambition from the council plan with regards nature-based solutions. To implement these will require land to be secured now for measures to put in place now so they can mature over time. Limiting to council projects only will not deliver sufficient measures. The ambition should be greater with the council actively funding and seeking landowner agreements to maximise the opportunity.
9. Objective AD1 Increase the resilience and adaptive capacity of the local authority and the local community to the current and projected impacts of climate change. In the lowest magnitude climate change projection for sea level rise, the latest ICWWS peak coastal flood levels for the 50%AEP event are roughly equivalent to the present day 2% or 1%AEP event (varies by location). This means significant floods such as Storm Debi, will occur on average every other year. Does the council have the resources to expenditure the review and implementation of resilience measures immediately? Is the council prepared to manage a just transition to relocate property and infrastructure? This hard decision is inevitable in some locations. With climate change existing infrastructure such as standard block walls will be exposed to flood water. These features not designed to withstand flood water may easily collapse as experienced in Storm Debi (Maree rd and Coast rd in Oranmore). There is no mention in the plan of how existing structures and infrastructure could exacerbate climate related hazards. Standard construction walls and bridge parapets cannot be relied upon as flood defences and with future flood exposure may in fact increase flood hazard and risk.
10. Objective AD 2 Ensure an appropriate, coordinated and resourced Emergency Response during climate-related emergencies and events. The council must give a commitment that emergency response plans are based on the latest available hazard and risk maps. All emergency responders must use this data.

Chief Executive's Response and Recommendation:

Response:

The CE thanks Mr Sampson for the detailed and informative submission.

1. It is considered that requirements in relation to maintenance are adequately addressed under Action TR 1.7 *Ensure adequate road maintenance for active travel users* and Action AD 1.5 *Identify and implement operational measures necessary to protect critical infrastructure/equipment from climate events, and develop any necessary maintenance/upgrade programmes to address climate risk.*

It is considered that requirements in relation to adaptation to flooding are set out in a number of actions including Action AD 1.1 *Collaborate with OPW in assessing the likely impacts of climate change including sea level rise and coastal erosion on the built environment. Prioritise areas for further assessment and seek funding/support to mitigate the risk. Assist CARO in the development of a register of critical infrastructure, systems and assets at risk from existing and projected climate events* and Action AD 2.2 *Identify contingency plans for climate events that have the potential to impact critical infrastructure, the failure of which would have major consequences and/or a cascading effect on other services. Prepare strategic wildfire management plan for high-risk areas. Provide clear communication to communities.*

2. Implementation of the plan will be dependent on the provision of both internal resources and external supports from National Agencies, National Government and EU funding. Galway County Council is committed to implementing the plan and will seek adequate resources and support from the relevant agencies/departments and other funding sources.
3. Local authorities were required to carry out Tier 1 Risk Assessments as part of the development of the draft Local Authority Climate Action Plan. These risk assessments are high level and do not support the development of precise indicators at this time e.g. number of homes/businesses at risk of flooding in particular areas. Furthermore, the actions to be taken to reduce risk will be dependent on support/funding/implementation by National Agencies/Government Departments. Further detailed risk assessment and confirmation of support/funding/implementation is required to enable the development of indicators that confirm increased resilience. Action AD 1.1. will support the development of more precise risk assessments. It is proposed to update this action to reflect this advice as per recommendation below.
4. Comment Noted. Assignment of responsibility will require input from National Government and National Agencies and may require changes to legislation. This is related to Point 3 above and affects the ability to set more precise indicators. Within the draft Plan we have endeavoured to assign responsibility for the Actions

identified and identify where collaborations would be required with other stakeholders.

5. Galway County Council apply for funding on an annual basis for Climate Change Adaptation and Resilience works for specific roads. €1,169,193 was awarded in 2023 for 28 specific locations. This programme of work is referenced under Action AD 1.4 *Develop and implement annual Climate Adaptation Strategies for Regional and Local Roads*. The specific locations are not mentioned in the plan as the programme is updated on an annual basis.
6. Comment Noted. Zoning and individual developments are subject to flood risk assessment as set out in the County Development Plan 2022-2028.
7. Comment Noted. Action AD 1.3 refers to ensuring that Flood Risk Management and Climate Change Sectoral Adaptation Plans continue to be incorporated into the spatial planning of the County, including Sustainable Urban Drainage Systems (SuDS).
8. Comment Noted. Action AD 1.7 commits to working with other stakeholders to identify and support Minor and Major Flood Protection and Flood Proofing Schemes throughout the county that supports Nature Based Solutions to increase co benefits.
9. Comment noted AD 1.1 and AD 2.2 will assist with identifying the risks. Additional resources will be required, however, to address these issues.
10. Action AD 2.4 Capture the impact of extreme weather events by integrating existing incident recording and management systems including WIRE and SWEMS, carry out training and record incidents.

Galway County Council have developed and piloted a new system to aid real-time decision-making during weather and emergency events, capturing and analysing information on severe weather events as they happen, allowing for real-time decision making and a reduction in incident response times.

Recommendation:

1. No proposed changes to draft plan.
2. No proposed changes to draft Plan.
3. The KPI under Action AD 1.1 relates to these recommendations.

It is recommended that the text is amended and inserted into Action AD 1.1:

Action - Collaborate with OPW and other relevant stakeholders in assessing the likely impacts of climate change, including sea level rise, coastal erosion and flooding, on the built environment and heritage sites. Prioritise areas for further assessment and seek funding/support to mitigate the risk. Assist CARO in the development of a register of critical infrastructure, systems and assets at risk from existing and projected climate events.

KPI - Assessment Complete. Register Developed. Areas prioritised. Funding sought. Projects implemented.

- 4. No proposed changes to draft Plan.
- 5. No proposed changes to draft Plan.
- 6. No proposed changes to draft Plan.
- 7. No proposed changes to draft Plan.
- 8. No proposed changes to draft Plan.
- 9. No proposed changes to draft Plan.
- 10. No proposed changes to draft Plan.

Submission by:	Joyce Country and Western Lakes Geopark Project
Issues Raised/Relevant Chapter(s):	1. Introduction 4. Our Climate Actions
Summary of Submission:	

The submission suggests:

1. Adding the Joyce Country and Western Lakes (JCWL) aspiring UNESCO Global Geopark to the County's profile.
2. CP1: Continue support of Joyce Country and Western Lakes Geopark's activities with regard to its community network. The Geopark's community network allows the sharing of information, the dissemination of ideas and funding opportunities and the sharing of expertise on attracting such funding. The Geopark's existence itself is a great leverage opportunities for funding applications thanks to its holistic approach and international dimension.
3. LN1: Investigate the potential to label food produced locally in the JCWL Geopark with the added bonus of the upcoming UNESCO Global Geopark status

LN2: Continue support of Joyce Country and Western Lakes Geopark's activities with regard to its education program. The Geopark delivers presentation and outreach on climate change issues in all schools in the region and is developing site specific activities at the Geopark's geosites. This concerns all levels in education (primary, post-primary and Higher Education) as well as further education for adults. Furthermore, the Geopark works with all its partners for the production of education resources.

AD1: Continue support of Joyce Country and Western Lakes Geopark's activities with regard to education and collaborations with stakeholders. In particular, the development of a future proof management plan for the geosites in the geopark region and the communications on the actions of the Geopark's partner, including Mayo County Council.

Chief Executive's Response and Recommendation:

Response:

1. Comment noted. The County profile is a more general overview of the county and does not refer to specific sites. UGG1 of the Galway County Council Development Plan supports The Joyce Country and Western Lakes (JCWL).
2. Galway County Council would welcome collaboration with JCWL under Action CP 1.2 and CP 1.3.
3. Galway County Council would welcome collaboration with JCWL under LN1, LN2 and AD1.

Recommendation:

1. No proposed changes to draft Plan.
2. No proposed changes to draft Plan.
3. No proposed changes to draft Plan.

Submission by:	Community Gardens Ireland
Issues Raised/Relevant Chapter(s):	4. Our Climate Actions
Summary of Submission:	
<p>As growing your own food and community growing spaces support and aid biodiversity, reduce carbon and GHG emissions, help urban food security, and help with adapting to climate change impacts, Community Gardens Ireland recommend the following for the Galway CAP:</p> <ol style="list-style-type: none"> 1. Galway County Council should commit to supporting, promoting 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 Galway County Council. 2. Galway County Council to commit to performing a review of idle, vacant and derelict land throughout Galway County Council that could be used for community growing purposes. 3. Galway County Council to commit to executing a survey of local residents throughout the county asking if they are interested in an allotment or a community garden close to them, similar to that executed by Kildare County Council in previous months: https://consult.kildarecoco.ie/en/content/would-you-allotment-near-you 4. Galway County Council to commit to opening and supporting a seed library in Galway County Council Libraries similar to the one established within Wicklow County Council and in Hollyhill Library in Cork City. 5. Galway County Council to recognise National Allotments and Community Gardens Week by celebrating the role of community growing within communities throughout Galway County Council during this week each year. 	
Chief Executive's Response and Recommendation:	
Response:	

1. Comment noted. Support will be provided to communities to take climate action as set out in the Actions under Objective CP1. As noted, food and waste is one of the themes for community projects eligible for funding. It is proposed to amend Action CP 1.2 as recommended below.
2. Comment noted. It is proposed to amend Action LN 2.2 as recommended below.
3. Comment noted.
4. Comment noted. This is a potential project under Action CE 1.1 Support *circular initiatives such as prevention, reuse, repair and recycling of resources. Support the development of cooperative, community-owned and other collaborative ventures to foster more effective use and sharing of resources.*
5. Comment noted. We would welcome the opportunity to work with Community Gardens Ireland during the National Allotments and Community Gardens Week to celebrate community growing.

Recommendation:

1. Amend Action CP 1.1 **Support Community Action in the areas of community energy projects, travel, shopping and recycling, environmental action and food and waste including community gardens.** Administer Community Climate Action Fund and support communities in the implementation of the projects.
2. Amend Action LN 2.2 Audit local authority land **and buildings**, carry out ecological/habitat surveys and highlight areas at risk (as well as areas which are thriving or providing sequestration services) and those suitable for restoration and enhanced carbon storage, **community purposes or as** ~~also identifying potential~~ wildlife corridors for protection through statutory plans.
3. No proposed changes to draft Plan.
4. No proposed changes to draft Plan.
5. No proposed changes to draft Plan.

Submission by:	<u>Kinvara Climate Action</u>
Issues Raised/Relevant Chapter(s):	1. Introduction 4. Our Climate Actions

Summary of Submission:

The submission from Kinvara Climate Action urges for urgent radical, systemic change to avert climate catastrophe, and calls for more ambitious and concrete targets in the LACAP.

1. **Governance and Leadership:** County leadership is very important, staff awareness and training within the Local Authority is imperative and should be mandatory. We can no longer afford business as usual, and our local leaders need to know that there will be strong resistance to policies that take us in the wrong direction. Roll out a public awareness campaign, including for agricultural stakeholder, including information on the science of climate change, ecosystems understanding and explain why green policies are imperative. Adopt Donut economics and Permaculture principles as guiding frameworks. Consider the uncertainties and risks around Tipping points and feedback loops. Promote diets and lifestyles that have lower carbon footprints. Diversification of agriculture is very important for food security. To lead by example all public catering events should promote local organic where possible, plant-based diets, and all catering should be meat free.
2. **Energy and Built environment:** Do not develop facilities such as data centres in the county. We do not support up-scaling biomethane production. GCC to endorse the Fossil Fuel Non-proliferation Treaty. Support the development of local community energy co-ops.
3. **Building and Planning regulations:** Support One Planet Living developments and community innovation projects. Planning Permission for all new buildings, especially business, industrial or farm buildings, should require the inclusion of solar panels or passive heating systems, where appropriate, supported by grant aid.
4. **Transport:** Conduct an audit of potential active travel projects across the county, in partnership with local communities. Create safe routes to all schools for children to cycle and walk and improve permeability, including to train stations and bus stops. Build extensive cycling networks across the county, in both urban and rural areas, taking into account flood risk. Follow the best practice of countries that have advanced cycling and public transport infrastructure. Consider introducing/supporting a light rail system, park and ride schemes, bike and e-car hire schemes, a congestion charge, changes to speed limits and a phase-out of internal combustion engines in busy urban centres. Incentivise public transport by making it free and/or more affordable and dis-incentivise car use by making driving and parking less affordable. Oppose the construction of the ring road, which will lock the county into increasing emissions and gridlock and divert the funding to more sustainable public transport and green economy projects.
5. **Communities and Partnership:** Increase the funding and autonomy of local authorities to enable more action, publicise and allocate public land and buildings to community groups for social enterprises and green transition projects, and support the development of local food policy and hubs.

6. Circular Economy: Prioritise reduce and reuse strategies over recycling, promote water refill stations, reusable cups, libraries of stuff, refill shops, and co-operatives, and set targets for reduction of plastic waste and regenerative businesses.
7. Land Use and Green Infrastructure: Adopt a Rights of Nature Motion within the Council. Rights of Nature is a concept, or way of thinking, about how we can redefine our relationship with the natural world. This would be a key way to build environmental protection into all decision making and raise awareness about the biodiversity crisis we are facing. Carry out an Ecological audit of Local Authority land and engage with community groups who are already doing important environmental work on the ground. Support Regenerative Bioregional Plans to incorporate community gardens and allotments, alongside community supported agriculture projects and neighbourwoods cooperatives for local community coppicing projects for local fuel and fibre production. Support best practice management of hedgerows and woodland and work with community groups on expanding areas of native woodland and high nature value habitats on council land. Increase annual afforestation rates and promote sustainable forest management initiatives. Continue to support wild zones and wildflower meadows, utilising only locally grown seed, trees and pollinator friendly planting schemes. Utilise best practice across all public spaces, educating council staff and all community bodies on sustainable practices. Introduce a pesticide ban in the county. Support Regenerative Bioregional Multi Stakeholder Landscape Partnership Projects.
8. Adaptation to Climate Risk: Galway County Council should have Regenerative, Permaculture and Nature-Based Solutions (NBS) at the forefront of their adaptation and mitigation strategies for inland and coastal flooding and other climate driven risks. Some of the best NBS are derived from natural vegetation, such as planting more trees. Catchment-based solutions should be examined for flood defence. Farmers and Landowners should be involved and compensated for lost livelihoods. These projects should also be considered because they largely dispense with hard engineering carbon heavy concrete and steel reinforcement. A large proportion of Galway's population live and work near the coast, often in homes and businesses built on floodplains. Nature based solutions can have a very important role in protecting lives and livelihoods as well as homes and businesses along the coast. Support more research on Marine Permaculture projects. All public owned lands near a river basin should be planted with native riparian woodland. Working with nature, offers opportunities e.g. paying landowners upstream to allow occasional flooding of their land that would protect homes and businesses downstream may be cheaper than other solutions.
9. Climate and food security: Promote diversification of farming to insulate against disruptions to food security and make public land and buildings available to house local community food hubs, co-ops and community supported agriculture projects to support local food production. Support community gardens and public Edible Landscaping projects. Include food insecurity in climate risk assessments. Support and develop in partnership with local stakeholders a Local Food Policy/Council/Map/Framework to support affordable, locally produced, nutrient dense, chemical-free food for all. This

should include institutional recognition for Local Food Producers, Green Procurement, access to land supports and a mapping system with easy access by local communities. We want farmers to earn a fair living and to be supported in taking climate action through a positive policy frame work. Support Local Community Food, Health & Wellbeing Hubs. Develop a multi-department, integrated approach to reviving and climate proofing our rural communities.

Chief Executive's Response and Recommendation:

Response:

The CE would like to thank Kinvara Climate Action for their submission to the LACAP.

1. Comment noted. Climate Action training is mandatory for all local authority staff and elected representatives. It is proposed to carry out a Public Awareness Campaign under Action CP 1.2. It is proposed to amend the wording of this action as set out in the recommendation below.

The uncertainties and risks are dealt with in detail in the Climate Change Risk Assessment prepared as part of the development of the draft Plan.

The drive to reduce emissions from and improve environmental performance of Irish agriculture is underscored by recent policies and strategies such as the revised EU Common Agricultural Policy, the EU's Farm to Fork Strategy and nationally, the Food Vision 2030 strategy and the Climate Action Plan 2024. A target of 25% emissions reductions has been set for the Agricultural Sector.

While the draft Plan is ambitious to reflect our leadership role on climate action, the Plan does not include actions whereby their implementation and achievement fall outside our role, remit, and governance. The interaction between the local government and agricultural sectors are limited by statutory remit, however, there are a number of areas where the local authorities can play a role in supporting the agricultural sector to reduce emissions. It is considered that the actions set out in the plan, in particular under Goal 6 Land Use and Natural Environment, reflect our remit in this area.

2. Comment noted. Spatial planning is addressed in the County Development Plan 2022-2028 which includes the Local Authority Renewable Energy Strategy. This was developed in line with the National Planning Framework which has 10 Strategic Objectives which cover many of the issues raised in point 2 including Transition to a Low Carbon and Carbon Resilient Society.
3. Comment noted. Spatial planning is addressed in the County Development Plan 2022-2028 which includes the Local Authority Renewable Energy Strategy. This was

developed in line with the National Planning Framework which has 10 Strategic Objectives which cover many of the issues raised in point 2 including Transition to a Low Carbon and Carbon Resilient Society.

4. Comment noted. We will continue to work with key stakeholders including Galway City Council, National Transport Authority and Transport Infrastructure Ireland to play our part in establishing high quality active travel and sustainable travel infrastructure and support an increased uptake of travel by sustainable modes in line with the Galway County Development Plan 2022-2028, the Galway Transport Study, the Galway County Transport Planning Strategy, the Walking and Cycling Study and Local Transport Plans and the Galway County Council Climate Action Plan.

Many of the actions suggested will be possible under the existing actions under Objective TR 1 *Support active travel and modal shift to advance sustainable, accessible, and safe mobility.*

Spatial planning for the Galway City Ring Road is dealt with under the County Development Plan 2022-2028.

5. Comment noted. The Climate Action Fund is financed by National Government and administered by the Local Authority. Under Action LN 2.2 it is proposed to carry out an audit of local authority property. It is proposed to amend this action to reflect this submission.
6. Comment noted. Actions under Objective CE1 aim to support communities, businesses and individuals to reduce the generation of waste and increase the quantity of waste reused and recycled. It will be possible to implement many of the suggestions in this submission within these actions.
7. Comment noted. A Rights of Nature Motion submitted by the Green Recovery Group is under consideration by the Climate and Biodiversity SPC of Galway County Council. Under Action LN 2.2 it is proposed to carry out an audit of local authority property. Action in relation to woodland and hedgerows is addressed in part under Action LN 2.3. It is proposed to update this action to reflect this advice.

Climate Action training is mandatory for all local authority staff and elected representatives. There are a number of actions related to education with the draft Climate Action Plan including GL 3.1, CP 1.2, CP 1.3, CP 1.5, CP 1.10, CP 1.12. It is envisaged that any education programme developed will cover a wide range of actions including sustainable land management, sustainable living, planetary boundaries and biodiversity.

Actions under Objective LN2 will also support many of the suggestions in this section of the submission.

8. Comment noted. Actions under Objective AD1, particularly AD 1.1, AD 1.3, AD 1.6, AD 1.7 and LN 1.1 deal with this section of the submission. In particular, Action AD 1.7 commits to working with other stakeholders to identify and support Minor and Major Flood Protection and Flood Proofing Schemes throughout the county that supports Nature Based Solutions to increase co-benefits.
9. Comment noted, and Objective LN1 and its associated actions refer. Galway County Council look forward to working with Kinvara Climate Action, Teagasc, the BIA Innovation Centre, and other stakeholders on this matter. While the draft Plan is ambitious to reflect our leadership role on climate action, the Plan does not include actions whereby their implementation and achievement fall outside our role, remit, and governance. The interaction between the local government and agricultural sectors are limited by statutory remit, however, there are a number of areas where the local authorities can play a role in supporting the agricultural sector to reduce emissions. It is considered that the actions set out in the plan, in particular under Objective LN1 and its associated actions, reflect our remit in this area. Under Action LN 1.2 we will work with the BIA Innovation Centre to support climate action in the food and agriculture sector.

Recommendation:

1. Amend Action CP 1.2: Establish a training, information and support programme for **individuals**, community groups **and** community event organisers on Climate Action and Biodiversity. **Ensure that the programme takes into account the needs of vulnerable groups and those at risk from climate change.** Carry out annual training programme.
2. Amend Action CP 1.1: **Support Community Action in the areas of community energy projects, travel, shopping and recycling, environmental action and food and waste including community gardens.** Administer Community Climate Action Fund and support communities in the implementation of the projects. No proposed changes to draft Plan.
3. No proposed changes to draft Plan.
4. No proposed changes to draft Plan.
5. Amend Action LN 2.2: Audit local authority land **and buildings**, carry out ecological/habitat surveys and highlight areas at risk (as well as areas which are thriving or providing sequestration services) and those suitable for restoration and

enhanced carbon storage, **community purposes or as** ~~also identifying potential~~ wildlife corridors for protection through statutory plans.

6. No proposed changes to draft Plan.
7. Amend Action LN 2.3: Conduct a tree cover survey and devise and adopt a tree management policy that recognises the ecosystem services provided by existing woodland habitat **and hedgerows** and seeks to retain and support such habitats.
8. No proposed changes to draft Plan.
9. No proposed changes to draft Plan.

Submission by:	Galway County PPN GRWG
Issues Raised/Relevant Chapter(s):	Climate Change Overview Our Climate Actions
Summary of Submission:	
<p>The submission provides feedback, observations, and recommendations based on the group’s vision of creating awareness, understanding, and engagement on climate change and biodiversity loss, and supporting a sustainable, just transition and green recovery for Galway communities.</p> <ol style="list-style-type: none"> 1. The local authority has a very important role in Climate Action and should be strengthened and adequately financed to allow an appropriate response to the scale of the climate emergency. We do not believe that the council is adequately resourced to deal with the scale of the problem. 2. Climate Change Overview: Adopt a more precautionary approach to climate change projections, considering the uncertainties and risks of tipping points and feedback loops. 3. Increase stakeholder buy-in and public information campaigns on the scale and urgency of the challenge. Without Councillor buy in and understanding of the seriousness of the climate and biodiversity emergency effective strong governance and leadership will not materialise. We were disappointed to hear about the comments/beliefs of some Councillors who attended the July Plenary. Provide mandatory training for council staff and elected representatives on climate science and ecosystems awareness. 	

4. Implement green public procurement policies, such as meat-free catering, waste-free and plastic-free zones, community and/or locally sourced and native plant materials including at all Council/PPN events and offices. All green infrastructure and plant based materials and products for public developments should be of local provenance, native and/or edible, and from local community or in-house nursery stock.
5. Energy and Built environment:
Do not develop facilities such as data centres that consume vast amounts of electricity and put the energy transition at risk.
6. Support community co-operatives for food, housing, and renewable energy, promoting community ownership and access to the benefits of the green economy.
7. Consider the role of renewable gas only as a niche solution, not one that depends on intensive farming or new fossil fuel infrastructure. Avoid relying on carbon capture technologies that are unproven, costly, and risky.
8. Transport: Conduct an audit of potential active travel projects across the county, in partnership with local communities. Create safe routes to all schools for children to cycle and walk and improve permeability, including to train stations and bus stops. Build extensive cycling networks across the county, in both urban and rural areas, taking into account flood risk. Follow the best practice of countries that have advanced cycling and public transport infrastructure. Consider introducing/supporting a light rail system, park and ride schemes, bike and e-car hire schemes, a congestion charge, changes to speed limits and a phase-out of internal combustion engines in busy urban centres. Incentivise public transport by making it free and/or more affordable and dis-incentivise car use by making driving and parking less affordable. Oppose the construction of the ring road, which will lock the county into increasing emissions and gridlock and divert the funding to more sustainable public transport and green economy projects.
9. Communities and Partnership: Grassroots groups and local communities are essential to climate action and to ensure policies are both fair and effective and the PPN provides a mechanism to mobilise at community level. Support and develop a new campaign to support a bioregional regenerative 'People's Transition Programme', with the establishment of community-based one-stop shops hosted by the PPN, and supported by community permaculture and transition hubs in every village and town in the county and information hubs. Work with the PPN to mobilise collective action and citizen engagement on climate action, providing information, training, feedback, and resources. Increase the Climate Action Fund and make it more accessible and supportive of community-led projects. Support the development of a Local Food Policy to ensure food sovereignty, security, and justice for all.
10. Circular Economy: Prioritise strategies to eliminate, reduce, and reuse plastic and other waste, rather than recycle. Promote libraries of stuff, water refill stations, keep cup schemes and plastic-free sections in supermarkets and shops. Make disposing of household waste-streams easier and safer, and ensure there are locations for the return

of waste/excess chemicals and paints. Ensure all council in-house and publicly funded work programmes and actions are regenerative and supportive of the circular economy, and educate staff and community groups on regenerative living and ecosystems.

11. Land Use and Green Infrastructure:

11.1. Conduct an audit and review of the county-wide land use strategy, identifying and protecting all high nature value areas and wildlife corridors. Work closely with all stakeholders including community groups who are already undertaking conservation work.

11.2. Consider areas of high biodiversity value more when processing planning applications and avoid the slow whittling away of valuable habitats. Hedgerows are essential wildlife corridor connectors but are being removed at an alarming rate. New planning permissions should specify measures to maximise retention of hedgerow habitat and replace habitat once the development has been completed. Protect trees including on private land and new developments including single and small groups of trees.

11.3. Support the adoption of a Rights of Nature motion by the council to recognise the inherent rights of natural ecosystems and the interdependence of human and planetary health. Rights of Nature is a concept, or way of thinking about how we can redefine our relationship with the natural world.

11.4. Tackling Food Sovereignty, Food Security & Food Poverty - Support community groups and projects that are undertaking conservation, rewilding, restoring ecosystems, and planting native trees. Support Regenerative Bioregional Plans and a Local Food Policy to incorporate community gardens and allotments, community supported agriculture, and local fuel and fibre production. Support farmers and ensure they earn a fair living while providing food to their communities.

11.5. Ban pesticide use on lands within the Local Authorities remit, with an exception only for the management of invasive species. Strong leadership is needed so that people can learn to embrace nature in all its untidiness and allow it to thrive and flourish. Conduct an audit of Invasive Species, ensure there is a system for recording of data and develop a plan of treatment, management and elimination in partnership with research bodies and national Biodiversity Data Centre.

12. Adaptation to Climate Risk: Nature-based solutions (NBS) should be more prioritized and explored for flood defence in coastal and inland areas, as they can provide environmental, social and economic benefits, as well as reduce carbon emissions and enhance biodiversity. Farmers and Landowners should be involved and compensated for lost livelihoods. Permaculture and NBS experts from other regions should be invited to inform and educate the staff and local communities on these developments. Protect wetlands including rivers and coastal wetland habitats as important carbon sinks and for coastal erosion and flood protection.

13. Climate and food security: LN1: Include food insecurity in the risk assessment. Ireland can become much more resilient to climate shocks and food shortages in other countries if we diversify our farming. Policies that support communities to grow food like community gardens should be supported.

14. Bioregional Green Mapping: Put in place a Green Community Mapping Scheme to highlight the transition actions underway. Local Futures is a pioneer of the worldwide localization movement, raising awareness about the power of 'going local' as a key strategy for restoring ecological, social and spiritual wellbeing. We have to aim to return to our local bioregions to meet our needs where possible, as we transform our impact from one of exploitation and degeneration towards becoming healing and regenerative custodians and nurturers of the ecosystems we inhabit, meeting our needs in harmony with the needs of the local landscape, ecosystem by ecosystem.

Chief Executive's Response and Recommendation:

Response:

The CE would like to thank Galway County PPN GRWG for their submission to the LACAP.

1. Comment noted. The draft Plan is ambitious in nature and it is noted that additional resources will be required both in terms of staff and funding to carry out the actions identified in the plan. Commitment has already been received in relation to some of the actions through Government Departments or existing projects. Committing to actions through the adoption of the draft Plan will assist us in applying for funding or resources where existing resources are inadequate.
2. Comment noted. Local authorities were required to carry out Tier 1 Risk Assessments as part of the development of the draft Local Authority Climate Action Plan and were dependant on the available national guidance and information. These risk assessments are high level. Action AD 1.1 (revised) will support the development of more precise risk assessments. It is proposed to update this action as per recommendation below. It is expected that updates to national and international datasets will support more precise risk assessment in future.
3. Comment noted. Climate Action training is mandatory for all local authority staff and elected representatives. It is proposed to carry out a Public Awareness Campaign under Action CP 1.2. It is proposed to amend the wording of this action as set out in the recommendation below.
4. Comment noted. Galway County Council have worked with suppliers at a number of recent events to reduce the environmental impact of the food and packaging utilised and to educate attendees in relation to the impact of their food choices. We will continue to expand this to all council events through a Green Public Procurement

Strategy. Galway County Council are currently developing a Wood Procurement Policy which will support best practice in the sustainable procurement of wood products.

5. Comment noted. Spatial planning is addressed in the County Development Plan 2022-2028 and associated Local Authority Renewable Energy Strategy.
6. Comment noted. Galway County Council is supportive of community initiatives and will seek to support community actions through the various sections of the council, including through the Community Climate Action Fund.
7. Comment noted. Spatial planning is addressed in the County Development Plan 2022-2028 which includes the Local Authority Renewable Energy Strategy. This was developed in line with the National Planning Framework which has 10 Strategic Objectives which cover many of the issues raised in point 2 including Transition to a Low Carbon and Carbon Resilient Society.
8. Comment noted. We will continue to work with key stakeholders including Galway City Council, National Transport Authority and Transport Infrastructure Ireland to play our part in establishing high quality active travel and sustainable travel infrastructure and support an increased uptake of travel by sustainable modes in line with the Galway County Development Plan 2022-2028, the Galway Transport Study, the Galway County Transport Planning Strategy, the Walking and Cycling Study and Local Transport Plans and the Galway County Council Climate Action Plan.

Many of the actions suggested will be possible under the existing actions under Objective TR 1 *Support active travel and modal shift to advance sustainable, accessible, and safe mobility.*

Spatial planning for the Galway City Ring Road is dealt with under the County Development Plan 2022-2028.

9. Comment noted. Galway County Council recognises the important role of the PPN in the county and looks forward to ongoing collaboration in relation to Climate Action. In order to highlight the importance of the PPN it is recommended that action CP 1.3 be amended as set out below.
10. Comment noted. These suggestions can be incorporated under Action GL 3.2, CE 1.1, CE 1.2, CE 1.3.
11. Comments noted.
 - 11.1. An audit of GCC land is dealt with under Action LN 2.2. Under Action LN 2.2 it is proposed to carry out an audit of local authority property. It is proposed to amend this action to reflect this submission set out below.
 - 11.2. Spatial planning is dealt with under the County Development Plan 2022-2028. The current Heritage and Biodiversity Plan 2017-2022 will be reviewed in

2024 and will support the County Development Plan policy objectives. Galway County Council is currently in the process of undertaking Biodiversity Action Plans for each Municipal District and also working in partnership with local communities and other stakeholders with regards to developing Local Biodiversity Action Plans.

11.3. A Rights of Nature Motion submitted by the Green Recovery Group is under consideration by the Climate and Biodiversity SPC of Galway County Council.

11.4. While the draft Plan is ambitious to reflect our leadership role on climate action, the Plan does not include actions whereby their implementation and achievement fall outside our role, remit, and governance. The interaction between the local government and agricultural sectors are limited by statutory remit, however, there are a number of areas where the local authorities can play a role in supporting the agricultural sector to reduce emissions. It is considered that the actions set out in the plan, in particular under Goal 6 Land Use and Natural Environment, reflect our remit in this area. Under Action LN 1.2 we will work with the BIA Innovation Centre to support climate action in the food and agriculture sector.

11.5. Actions as suggested are addressed in part under Actions LN 2.3. It is proposed to update this action to reflect this advice as per recommendation below. This issue is addressed in the Sustainable Plant Management Plan which was adopted by Galway County Council in 2023 and aligns with Action LN 2.4 *Implement a pesticide and herbicide reduction plan for Galway County Council*.

There is a national Biodiversity Data Centre app that can be used by staff, public stakeholders and the community to identify invasive species in the county.

12. Comment Noted. Action AD 1.7 commits to working with other stakeholders to identify and support Minor and Major Flood Protection and Flood Proofing Schemes throughout the county that supports Nature Based Solutions to increase co-benefits.

13. While the draft Plan is ambitious to reflect our leadership role on climate action, the Plan does not include actions whereby their implementation and achievement fall outside our role, remit, and governance. The interaction between the local government and agricultural sectors are limited by statutory remit, however, there are a number of areas where the local authorities can play a role in supporting the agricultural sector to reduce emissions. It is considered that the actions set out in the plan, in particular under Goal 6 Land Use and Natural Environment, reflect our remit in this area.

14. Comment noted. Sharing of information in relation to actions underway in communities will be carried out under Action CP 1.2 and CP 1.3.

Recommendation:

1. No proposed changes to draft Plan.
2. Amend Action AD 1.1- Collaborate with OPW and other relevant stakeholders in assessing the likely impacts of climate change, including sea level rise, coastal

erosion and flooding, on the built environment and heritage sites. Prioritise areas for further assessment and seek funding/support to mitigate the risk. Assist CARO in the development of a register of critical infrastructure, systems and assets at risk from existing and projected climate events.

3. Amend Action CP 1.2: Establish a training, information and support programme for individuals, community groups and community event organisers on Climate Action and Biodiversity. Ensure that the programme takes into account the needs of vulnerable groups and those at risk from climate change. Carry out annual training programme.
4. No proposed changes to the draft Plan.
5. No proposed changes to the draft Plan.
6. No proposed changes to the draft Plan.
7. No proposed changes to the draft Plan.
8. Amend Action TR 1.8 *Support the Safer Routes to Schools programme and School Streets Initiative, providing education and training on cycle buses and walking buses. Investigate the feasibility of infrastructure requests from Walkability Audits and Cyclability audits carried out by Green Schools and others. Collaborate with Green Schools Travel Team to support Active Travel Initiatives including 'no-idling' campaigns and Park 'n' Stride schemes.*
9. Amend Action CP 1.3 Establish network of communities to disseminate information from the DZ areas across the country (CONNECTED Project). Work in partnership with the PPN to encourage and support climate action in the community. Consider the inclusion of additional categories related to Climate Action in the Cathaoirleach Awards.
10. No proposed changes to the draft Plan.
11. Amend Action LN 2.2: Audit local authority land and buildings, carry out ecological/habitat surveys and highlight areas at risk (as well as areas which are thriving or providing sequestration services) and those suitable for restoration and enhanced carbon storage, community purposes or as ~~also identifying potential~~ wildlife corridors for protection through statutory plans.

Amend Action LN 2.3: Conduct a tree cover survey and devise and adopt a tree management policy that recognises the ecosystem services provided by existing woodland habitat and hedgerows and seeks to retain and support such habitats.

12. No proposed changes to the draft Plan.

13. No proposed changes to the draft Plan.

14. No proposed changes to the draft Plan.

Submission by:	Dermot Corcoran
Issues Raised/Relevant Chapter(s):	Climate Change Overview
Summary of Submission:	
<p>1. 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. Estimates of Irelands total nationally in 2022 is 62.4million 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 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.</p> <p>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.</p> <p>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.</p>	
<p>2. 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</p>	

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.

3. 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-into 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.

Chief Executive's Response and Recommendation:

Response:

The CE would like to thank Mr Corcoran for his submission to the LACAP.

1. Comment noted.
2. Comment noted. We will continue to work with key stakeholders including Galway City Council, National Transport Authority and Transport Infrastructure Ireland to play our part in establishing high quality active travel and sustainable travel infrastructure and support an increased uptake of travel by sustainable modes in line with the Galway County Development Plan 2022-2028, the Galway Transport Study, the Galway County Transport Planning Strategy, the Walking and Cycling Study and Local Transport Plans and the Galway County Council Climate Action Plan.
3. Comment Noted. Zoning and individual developments are subject to flood risk assessment as set out in the County Development Plan 2022-2028.

Recommendation:

1. No proposed change to draft Plan.
2. No proposed change to draft Plan.
3. No proposed change to draft Plan.

Submission by:	Global Action Plan
Issues Raised/Relevant Chapter(s):	4. Our Climate Actions 6. Implementation and Reporting
Summary of Submission:	
<p>1. Global Action Plan (GAP) Ireland welcomes the fact that Galway County Council aspires to strong leadership for the actions set out in the draft action plan. Global Action Plan is hereby offering to assist the Council in these areas, for instance by offering some of its thematic workshops for County Council staff, and by making its extensive employee engagement experience available to the Council. To achieve the required change at all levels of society, Global Action Plan helps people understand the extent of their own personal contributions to our unsustainable lifestyles, and we support people in devising strategies to reduce their own impact. These actions are important in themselves, and they also inspire others to make the changes that we so urgently need. In that context, we appreciate the emphasis placed in the draft strategy on citizen engagement and training.</p> <p>An invitation to partner with Global Action Plan Global Action Plan (GAP) Ireland as an environmental organisation supporting sustainable communities across Ireland. GAP aims to inspire people to become ‘change makers’. Global Action Plan has three main programmes: a Schools programme, a Community programme, “Climate Heroes” competition and a Business programme. GAP look forward to working with Galway County Council on a range of initiatives including our “Climate Heroes” programme for community groups and our Climate Competition for Businesses both of which will run in April 2024.</p> <p>Global Action Plan also welcomes the recognition in the draft strategy that local authorities have a central role to play in shaping Ireland’s response to climate change: as an actor delivering climate actions in areas within its own remit, but also as an agent of change, influencing, facilitating and advocating for action by others. It is very positive to see this role highlighted, and linked to the wider political and policy context, as defined by the various international and national agreements and pieces of legislation.</p>	

While the emphasis on citizen engagement is welcome, we feel it is important to place greater stress on what should be the aim of any such engagement activities: the encouragement and development of local, informed climate actions. A greater focus on action requires an emphasis on the processes that encourage people to take action, and on meeting people's requirements to ensure such action is effective. The draft Climate Action Plan must address the barriers people experience in trying to tackle climate change. Such barriers relate not only to funding and knowledge, but also to values, emotions and perceptions of disempowerment.

We recommend strengthening the Draft Action Plan by explicitly addressing the barriers to change that people experience, and presenting proposals on how the County Council can help unleash the power of the virtuous cycle. Potential strategies in this context could include, for instance:

- Public communications strategies that emphasise what needs to change, who needs to change;
- Highlighting the many encouraging examples being set by businesses, citizens groups and local authorities all over Ireland;
- Framing climate action as a positive step that individuals and groups can take to realise greener, fairer and more liveable communities.
- Working with communities to encourage them along their climate action journey, by providing safe and nurturing spaces to deconstruct problems from a local and global perspective, and exploring challenges, barriers and opportunities;
- Supporting communities to develop tangible community action plans;
- Connecting communities with initiatives locally and nationally, to promote knowledge sharing and mutual inspiration.

2. Climate Action, Just Transition and Social Inclusion

The references to Just Transition in the draft Action Plan are very important and extremely valuable. Climate change requires societal change at all levels, but it equally requires specific and deliberate action and policy initiatives to ensure that the costs of the transition, as well as the benefits of the changes, are spread equitably across society, with those most affected by climate change and those least able to shoulder the burden of change are protected and supported.

We would recommend further reflection on how the Council's Climate Action Plan can contribute to 'Just Resilience' and Social Inclusion, too. Just Resilience refers to the need to scale up activities in response to the extreme weather events and other impacts of climate change that are already being experienced in Ireland. Crucially, these impacts are not only those directly related to extreme weather patterns - although much of the public discourse in Ireland focuses on those. But many communities in Ireland, due to their geographical location or socioeconomic status, are particularly vulnerable to the secondary effects of climate change, such as increases in the costs of food and insurance, changes in the impacts of diseases,

additional occupational health constraints, changes in employment opportunities, and increases in inward migration. Global Action Plan advocates for greater emphasis on Inclusion and Engagement as a critical element of the Climate Action Plan.

3. Community gardening In our view, an effective response to climate change requires a fundamental re-think of many aspects of our society, including the use of land and the systems for food production, food distribution and food marketing. We wish to highlight the many benefits of community gardens. 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 role Galway County Council sees for itself in supporting allotments and community gardens throughout the County.

Chief Executive's Response and Recommendation:

Response:

1. Comment noted. Galway County Council welcomes the offer of support from Global Action Plan and looks forward to working with the organisation on community engagement going forward. The Actions set out under Objective CP1 will include public communication initiatives that incorporate many of the suggested strategies.
2. Comment noted. Actions as suggested are addressed in part under Actions AD 1.2. It is proposed to update this action to reflect this advice as per recommendation below.
3. Comment noted. It is proposed to amend Action LN 2.2 and CP 1.1 as recommended below.

Recommendation:

1. No proposed changes to the draft Plan.
2. Amend Action CP 1.2: Establish a training, information and support programme for individuals, community groups and community event organisers on Climate Action and Biodiversity. Ensure that the programme takes into account the needs of vulnerable groups and those at risk from climate change. Carry out annual training programme.
3. Amend Action LN 2.2: Audit local authority land and buildings, carry out ecological/habitat surveys and highlight areas at risk (as well as areas which are thriving or providing sequestration services) and those suitable for restoration and enhanced carbon storage, community purposes or as ~~also identifying potential~~ wildlife corridors for protection through statutory plans.

Amend Action CP 1.1: Support Community Action in the areas of community energy projects, travel, shopping and recycling, environmental action and food and waste including community gardens. Administer Community Climate Action Fund and support communities in the implementation of the projects.

Submission by:	Comharchumann Fuinneamh Oileáin Árann Teo
Issues Raised/Relevant Chapter(s):	Aran Islands Decarbonising Zone
Summary of Submission:	
<p>CFOAT wishes to add to the existing proposed actions relating to the Aran Islands Decarbonising zone.</p> <ol style="list-style-type: none"> 1. Action DZ 1. 5 Improve understanding of emissions related to agriculture and LULUCF and update baseline emissions assessment. CFOAT proposes to include within the plan an explanation that the existing baseline of emissions related to agriculture and LULUCF are based on national averages and CSO data and the reality of the emissions of this sector on the islands are likely to be much lower due to the nature of farming practices in this region. 2. Action DZ 1. 9 Support the identification and development of appropriate community energy facilities. We propose to add here the investigation of the potential for developing the unused landfill site on the islands into a community owned solar farm which could be developed by CFOAT and GCC. There are examples of such projects in other local authority regions across the country. 3. Action DZ 1.12 Identify appropriate policy objectives related to renewable energy generation within the Decarbonising Zone for consideration in the next iteration of the County Development Plan. We propose to include here a review of the current barriers to the decarbonisation of the Aran Islands in previous CDPs and that, where possible and practical, these barriers are eliminated in order to promote the transition to clean energy on the Aran Islands. 4. The Comharchumann also noted the following by email: <ol style="list-style-type: none"> a. On pg. 29 of the draft Plan the year referenced in relation to an electric car group scheme should be 2011 rather than 2027. b. On pg. 88, 90 and 92 there is a reference to Comhar Cumann. This should be Comharchumann. 	
Chief Executive's Response and Recommendation:	
<p>Response:</p> <p>The CE welcomes the submission by Comharchumann Fuinneamh Oileáin Árann Teo and wishes to thank them for the ongoing work in the development and implementation of climate actions in the Decarbonisation Zone.</p> <ol style="list-style-type: none"> 1. Comment noted. It is proposed to update Action DZ 1.5 to reflect this advice as per recommendation below. 	

2. Comment noted. It is proposed to update Action DZ 1.9 to reflect this advice as per recommendation below.
3. Comment noted. It is proposed to update Action DZ 1.12 to reflect this advice as per recommendation below.
4. Comment noted. It is proposed to correct these are per recommendation.

Recommendation:

1. Amend Action DZ 1.5 Improve understanding of emissions related to agriculture and LULUCF and update baseline emissions assessment. (Note: Some of the emissions data related to agriculture and LULUCF in the Decarbonisation Zone is based on national averages. The actual emissions may lower due to the nature of farming practices in this region).
2. Amend Action DZ 1. 9 Support the identification and development of appropriate community energy facilities. Investigate the potential for developing the unused landfill site on the islands into a community owned solar farm.
3. Amend Action DZ 1.12 Identify barriers to reducing emissions within Decarbonisation Zone and identify appropriate policy objectives related to renewable energy generation for consideration in the next iteration of the County Development Plan.
4.
 - a. On pg. 29 of the draft Plan amend; Starting with a group purchase scheme in ~~2027~~ 2011 with just three electric cars, there are now more than 15 electric cars on Árainn alone.
 - b. On pg. 88, 90 and 92 replace ~~Comhar Cumann~~ with Comharchumann.

Submission by:	Fair Seas
Issues Raised/Relevant Chapter(s):	4. Our Climate Actions
Summary of Submission:	
<p>1. The climate and biodiversity crises are inextricably linked. The persistence of one exacerbates the other, and therefore, they must be addressed together at all levels of society if we are to truly mitigate, adapt and overcome these intertwined global emergencies. Ambitious climate action from local governments has never been more</p>	

important given the ever-worsening impact of anthropogenic-driven climate change on local communities, economies and the environment.

Fair Seas is a campaign which focuses on the proper protection and restoration of Ireland's seas, and we wish to highlight how effective action to reverse the decline of biodiversity at sea is critical to the health and productivity of our environment upon which society so heavily relies.

Fully functioning and healthy seas are our greatest ally or 'Nature Based Solution' in tackling climate change regarding mitigation (e.g., the sequestration of carbon from the atmosphere through 'Blue Carbon' marine habitats and species such as seagrass meadows) and adaptation (e.g., marine habitats providing protection from coastal erosion and flooding such as saltmarsh, sand dunes and seagrass meadows).

Therefore, Fair Seas are encouraged to see that some of the environmental objectives in the draft Climate Action Plan are to 'Protect, conserve and enhance County Galway's biodiversity and heritage (LN 2)' and to 'Support nature-based solutions to mitigate against and adapt to climate change and provide additional co-benefits (LN 3).'

However, we strongly suggest that an even greater emphasis on the role of biodiversity, and particularly the protection and restoration of marine biodiversity is warranted as the draft Climate Action Plan is progressed and associated actions finalised. The climate and biodiversity crises are inextricably linked and therefore a more joined-up and ecosystem-based approach is needed to address them, especially at the local authority level.

The protection and restoration of the environment, including the coastal marine environment is vital for coastal communities which are adapting to and growing resilience against the impacts of climate change.

2. Therefore, Fair Seas recommends that Galway County Council;
Support coastal communities in identifying coastal Marine Protected Areas (MPA) which would be designated under EU or National law (new national marine Protected Area legislation is due in 2024) to safeguard and enhance ecosystem services such as carbon sequestration, coastal erosion, and flooding protection and resilience, which would simultaneously improve marine biodiversity in the area. Bottom-up, community initiated and local stakeholder led protected areas are often the most successful in delivering positive outcomes for nature and climate. Fair Seas believe that Ireland's forthcoming new MPA legislation must include;
 - Ambitious MPA legislation and targets as soon as possible to protect and restore marine biodiversity enshrining the 30% of Irish waters in a MPA by 2030, as well as a 10% strictly protected targets into law;
 - Robust marine protected area management which ensures these sites are effective and deliver for nature;
 - Principled and high quality stakeholder participation in MPA site selection, monitoring and management with a clear timeframe of delivery.

Conduct feasibility studies for developing a Marine Protected Area along the Galway coast for the restoration of biodiversity including climate important habitats, species and ecological processes (e.g., oyster beds, shellfish beds, seagrass beds and kelp forests, saltmarsh, carbon sequestration, coastal defence) In Fair Seas' Revitalising Our Seas report, we carried out a scientific assessment of the high biodiversity and species rich areas in Irish waters which identified the Galway Bay area as an area of interest for MPA designation.

Carry out a marine ecosystem service assessment of the Galway coast to inform the development of a flagship restoration and conservation initiative which protects and enhances marine biodiversity as well as ecological processes important for mitigating and adapting to climate change such as carbon sequestration by seagrass meadows, or saltmarsh and sand dunes for coastal protection. Carry out marine natural capital analysis to understand how much County Galway's coastal and marine habitats contribute towards local economies when they are in a healthy state and the economic losses that could be suffered if they continue to become degraded. Nature restoration and the protection of ecosystems that store carbon and protect us from climate change is not a 'cost' but an investment. For example, studies show that restored natural habitats such as mangroves are extremely cost effective at preventing flooding, providing \$100,000s/ha in flood protection benefits over project lifetimes. Saltmarsh and seagrass meadows provide similar flood, coastal erosion and storm surge protection on the Irish coast.

These assessments should be progressed using local expertise and organisations, citizens science and academic institutes working together in and for the community. These assessments should be used to develop a prioritisation process of conservation actions which sets out how existing vulnerable, threatened and rare species, habitats and ecological processes should be protected and restored as soon as possible. Form a MPA working group which is tasked with developing, actioning and enforcing management in Galway's current marine and coastal protected sites (Natura 2000 & Natural Heritage Areas), as well as raising awareness, outreach and education of the role of the ocean in addressing the twin climate and biodiversity crises. Ireland's current Natura 2000 sites at sea lack effective management measures, whereas, if managed properly and with the help of local authorities, these areas could help coastal ecosystems and communities achieve greater levels of climate resilience and ecosystem health.

Fair Seas wishes the Galway County Council the best of luck in finalising and implementing their Climate Action Plan.

Chief Executive's Response and Recommendation:

Response:

1. The CE welcomes the submission from Fair Seas Ireland.

2. It should be noted a number of the requests are outside the remit of Galway County Council (e.g conduct feasibility studies for developing a marine protected area or the development of a marine ecosystem service assessment).

The current Heritage and Biodiversity Plan 2017-2022 will be reviewed in 2024 and will support the County Development Plan policy objectives. Galway County Council is currently in the process of undertaking Biodiversity Action Plans for each Municipal District and also working in partnership with local communities and other stakeholders with regards to developing Local Biodiversity Action Plans.

Galway County Council would welcome the opportunity work with communities, academic institutes and other organisations when implementing Action LN 2.1 *Identify priority areas appropriate to receiving environment for habitat restoration, enhancement for wildlife and protection for carbon and biodiversity benefits. Work with stakeholders including landowners to identify opportunities to deliver restoration of habitats and landscapes appropriate to the receiving environment.* There may be opportunities related to the marine environment when implementing this action and other actions of relevance in the plan including Action GL 4.1, LN 2.7, EB 3.1, LN 1.3, CP 1.1, CP 1.2, CP 1.6.

Recommendation:

1. No changes required to draft Plan.
2. No changes required to draft Plan.

Submission by:	Not Here Not Anywhere
Issues Raised/Relevant Chapter(s):	4. Our Climate Actions
Summary of Submission:	
<p>Not Here Not Anywhere applaud Galway County Council for its ambitious actions specified in the draft Plan. In their submission, as well as welcoming Actions GL3.2, GL4.1, TR1.3, TR1.4, CP1.8, LN1.1. They have outlined actions they believe add to the existing plans:</p> <ol style="list-style-type: none"> 1. Fossil fuels and fossil fuel infrastructure <ol style="list-style-type: none"> 1.1. The Climate Action Plan should ensure a rapid phasing out of all fossil fuels including gas, a planned phasing out of existing connections to the gas grid, a ban on fracked gas in its energy mix, rule out any new fossil fuel infrastructure projects. The County Council should pass a motion calling on the Irish Government to join the bloc of nation-states seeking to negotiate the Fossil Fuel Non-Proliferation Treaty - a new international treaty to complement the Paris Agreement and address the root cause of the climate crisis: fossil fuel. Impacts of Fossil Gas Projects. 1.2. Any new large-scale fossil fuel infrastructure must be ruled out, as they will lock us into additional use of fossil fuels. Further investment in fossil infrastructure will close the window on meeting our obligations under the Paris Agreement and the county’s and Ireland’s legally binding targets, rather than getting us closer. The 	

draft Plan should detail the explicit commitment not to construct liquefied natural gas (LNG) infrastructure in Galway. LNG has no climate benefit over coal or oil, whether from conventional or fracked sources. Methane, the primary component of natural gas, is a potent greenhouse gas (GHG) with 86 times more Global Warming Potential (GWP) than CO₂ over a 20 year period. New fossil fuel infrastructure is sometimes justified with references to the need to increase Ireland's energy security. Notably, the energy security risks associated with continuing climate breakdown, through fossil gas emissions, are often not considered in such discussions. New gas infrastructure is not required for energy security. As outlined in the draft Plan, we are legally bound to emissions-reduction targets under the Climate Act, 2021, which is fundamentally incompatible with increasing investment in new fossil fuel infrastructure. Therefore, the best energy security remains a rapid transition to indigenous renewable energy and a society-wide reduction in energy demand.

1.3. Apply pressure for an International Treaty to stop Fossil Fuels. Local Authorities should pressure the Irish Government to do this. Galway County Council should pass this motion. Having a Fossil Fuel Non-Proliferation Treaty in place could radically help Governments, including local governments like Galway County Council to achieve their climate action targets.

2. Energy - A better way forward

2.1. The Climate Action Plan should include actions which incentivise community energy projects - community based projects, organisations and social enterprises involved in the energy sector, owned and operated by local people and local authorities in the community.

2.2. The Climate Action Plan should prioritize safeguarding against Energy Poverty

2.3. The Climate Action Plan should contain measures to ensure that energy demand is managed responsibly and sustainably, with energy seen as a public good whereby essential services are prioritized. This should involve rapid retrofitting and the decarbonisation and increase of accessibility of public transport.

2.4. When introducing community energy projects or new energy infrastructure, decision processes should be designed in a participatory way, with input from residents and stakeholder group representatives. Special outreach efforts must be made to include disadvantaged or marginalized groups in participatory processes. Those running participatory processes should keep a detailed record of the participation of marginalized groups and of best practices that serve to increase this participation.

3. Data Centres

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 any new or 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: 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 system.

The Climate Action Plan should specify a cap on the operation of (new and existing) data centres based on its emissions targets and their emissions, and require new and existing data centres to be run on renewable energy. It is crucial that data centres are powered directly by onsite renewable energy generation such as rooftop solar farms or genuinely new offsite generation such as offshore wind or solar farms.

If the county council permits data centres and facilitates this growth in electricity demand by data centres, this will prevent the council meeting its emissions reductions targets in the Climate Action Plan. Furthermore, it is crucial that every City and County Council takes into consideration the cumulative impact of data centres' energy demand on a nationwide basis, as opposed to examining impact solely on a case-by-case basis.

Data centres provide a wide range of services, but are not transparent about the amount of energy used for these different purposes. While some capacity provides essential services to society (enabling public services like health, public transport, remote working, and communications between people), at the other end of the spectrum are services that can be seen as highly wasteful, such as cryptocurrency mining.

To make a case for the construction of the data centre, which will create further electricity demand and therefore challenge the realisation of Ireland's decarbonisation targets, the Climate Action Plan should require that data centre applicants provide information about the purpose or their services, and how they will ensure electricity is not wasted on storing dark or redundant data that have huge costs to our energy infrastructure without providing societal or commercial benefits.

Data Centres also generate large quantities of waste heat which could be utilised in district heating systems. Existing technology (such as heat pumps) to capture excess heat should be required and used to increase data centres' energy efficiency. The Climate Action Plan should require that data centres are only granted planning permission if they provide infrastructure to recover and utilise waste heat. This may require only granting data centres planning permission adjacent to where district heating systems are located.

Note: Supporting information has been provided for all recommendations in the submission

Chief Executive's Response and Recommendation:

Response:

The CE welcomes the submission from Not Here Not Anywhere.

1. Comment noted.
 - 1.1. Galway County Council is committed to meeting the 51% emission reductions target by 2030 and transitioning to net zero by 2050 which will include the rapid phasing out of Fossil Fuels.
 - 1.2. Spatial planning is addressed in the County Development Plan 2022-2028 which includes the Local Authority Renewable Energy Strategy. This was developed in line with the National Planning Framework which has 10 Strategic Objectives which cover many of the issues raised in point 2 including Transition to a Low Carbon and Carbon Resilient Society.
Galway County Council is committed to supporting the development of renewable energy resources and emerging technologies and to meeting national renewable energy targets as set out in Objective EB 1 and related actions including Action EB 1.1.
 - 1.3. This is outside the scope of the Galway County Council Climate Action Plan.
2. Comment noted.
 - 2.1. Galway County Council are very supportive of the development of community energy projects. There are policies within the County Development Plan 2022-2028 and associated Local Authority Renewable Energy Strategy which support community energy projects. These are also supported in the draft Plan under Actions CP 1.1 and CP 1.7.
 - 2.2. Energy poverty is addressed under a number of actions including Action DZ 1.3 which relates to support for group approaches to energy action and Action GL 2.7 relating to energy efficiency retrofits to social housing.
 - 2.3. We will continue to work with key stakeholders including the National Transport Authority and Transport Infrastructure Ireland to play our part in supporting an increase in the accessibility of public transport. Retrofitting is addressed under a number of actions including Action DZ 1.3 which relates to support for group approaches to energy action and Action GL 2.7 relating to energy efficiency retrofits to social housing.
 - 2.4. Support programmes for community groups are dealt with under Action CP 1.2 and CP 1.2. It is proposed to Amend this action to reflect this submission.
3. National policy on Data Centres is outside the scope of the Galway County Council Climate Action Plan. Spatial planning is addressed in the County Development Plan 2022-2028 which includes the Local Authority Renewable Energy Strategy. Galway County Council will adhere to all national guidance regarding data centre planning, energy consumption, renewable energy generation, and construction should a planning application be submitted.

Recommendation:

1.
 - 1.1. No proposed changes to the draft Plan.
 - 1.2. No proposed changes to the draft Plan.
 - 1.3. No proposed changes to the draft Plan.
2.
 - 2.1. No proposed changes to the draft Plan.
 - 2.2. No proposed changes to the draft Plan.
 - 2.3. No proposed changes to the draft Plan.
 - 2.4. Amend Action CP 1.2: Establish a training, information and support programme for **individuals**, community groups **and** community event organisers on Climate Action and Biodiversity. **Ensure that the programme takes into account the needs of vulnerable groups and those at risk from climate change.** Carry out annual training programme.
3. No proposed changes to the draft Plan.

Submission by:	An Taisce/Green-Schools Ireland
Issues Raised/Relevant Chapter(s):	4. Our Climate Actions
Summary of Submission:	
<p>1. Green-Schools is a student-led behaviour change programme delivered in over 3,500 schools nationwide. The Green-Schools Programme is a thematic programme where schools focus on a specific theme for a minimum of two years. Each of the Green-Schools themes promote positive environmental actions which are directly linked to climate action. At present, 202 mainstream schools are registered with the Green-Schools Programme in Co. Galway. This accounts for 86.7% of all primary, post-primary and special schools in Co. Galway. The programme also works with five non-mainstream education centres (adult education/creche/playschool) in the county.</p> <p>Green-Schools acknowledges its inclusion in Goal 4 –Communities and Partnership through Action CP 1.12 ‘Support the Green-Schools initiative and enable an increase in the number of schools actively participating’ and would like to highlight our work in the area of sustainable travel.</p> <p>This submission relates specifically to the Green-Schools Travel theme which focuses on the promotion of sustainable transport. This theme is funded by the Department of Transport and supported by the National Transport Authority. Green-Schools Travel is a behaviour change programme which aims to promote active modes such as walking, cycling, public bus transport and park & stride for schools. For this school year 2023-2024, 31 mainstream schools in Co. Galway are working on a travel theme with a</p>	

dedicated travel officer. In the Co. Galway region, three Green-Schools Travel Officers work directly with school communities to inform, motivate and support school communities to promote sustainable transport and develop partnerships.

Strategic Goal 4 : Mobilise Climate Action in Local Communities cited in ‘Delivering Effective Climate Action 2030. Green-Schools would welcome the opportunity to outline our work on the transport theme in detail to the GCC climate action office in the near future. Green-Schools Travel would like to note the following relative to the draft Plan: •Green-Schools Travel is a behaviour change programme that works to promote sustainable transport for school journeys across the country. The programme has been communicating the co-benefits of sustainable mobility to school communities since 2008 and can provide valuable insights relative to sustainable transport in schools from across the county.

2. This links to Action TR 1.2. Climate Change workshops and initiatives are a key part of the travel theme (SDG 13: Climate Action is a focus goal for travel themes. This links to Action GL 4.1 cited in the GCC Plan. Green-Schools would welcome the opportunity to outline our work to the climate action team and support in any way that we can.

Green-Schools Travel works with participating schools to complete walkability/cycleability audits with their dedicated travel officer. GST Audits invite the school community to investigate barriers to sustainable travel and identify solutions to promote walking/cycling. Recommendations generated from this activity stimulate action within the school community (no-idling campaigns, road safety campaigns) and can sometimes include simple road maintenance requests to Local Authorities. Opportunities for permeability to support sustainable travel are often part of the audit discussion. Green-Schools Travel would like to note that schools working on the theme can provide valuable insights to barriers.

Green-Schools Notes Action TR 1.4 ‘Work with communities to identify potential active travel, greenway and public transport projects and support modal shift’ and supports Action TR 1.6 to ‘Design and deliver new and improved road crossings, cycle lanes and walkways giving priority to disabled users, pedestrians and cyclists’ within the GCC LA CAP. In addition, walkability audits conducted by school communities as part of the theme can highlight road maintenance issues in the vicinity of schools. This links to Action T.R. 1.7 which is to ‘ensure adequate road maintenance for active travel users’. Green-Schools Travel has linked with the Active Travel office regarding audits but would like to make the Climate Action team aware of our work with school communities in Co. Galway.

Recommendation: Continue to seek to implement infrastructure requests from Walkability Audits and Cycleability audits carried out by Green-Schools and others.

3. Safe Routes to School is coordinated by An Taisce’s Environmental Education Unit, alongside Green-Schools, and works with a specific list of schools for each local authority.

Recommendation: In order to increase the reach of the climate action plan in your local authority, it would be important to also include Green-Schools Travel engagement into Action TR 1.8 of the plan.

Every opportunity to reduce carbon emissions needs to be examined. No-idling is a key initiative for the Green-Schools Travel programme which is actively promoted nationwide as part of school travel plans and Clean Air Week. The promotion of no-idling also aligns with the National Clean Air Strategy which states that 'more attention needs to be given to the development of localised measures which help improve air quality in urban areas that have suffered from increased congestion and localised transport related emissions'. These include reference to 'measures to reduce emissions from idling vehicles'.

Recommendation: Green-Schools Travel is in a position to support the development of no-idling campaigns in the public realm and would welcome an opportunity to collaborate with Galway County Council for no-idling campaigns for schools.

4. Dispersed rural settlement patterns sees car ownership and individual trips/journeys dominate transport trends in the county. Green-Schools Travel champions 'Park & Stride' (driving some of the way and walking the rest) initiatives across our network as a means to reduce traffic congestion and emissions outside schools. In urban areas where there is a greater concentration of schools, Green-Schools Travel has worked with several local authorities including Galway County Council to develop urban Park & Stride initiatives, e.g. Oranmore Park'n'Stride. Recommendation: Green-Schools Travel would welcome further opportunities to roll out additional Park 'n' Stride schemes in collaboration with Galway County Council.

Green-Schools Travel welcomes the development of the Galway Local Authority Climate Action Plans and commends Galway Council on its work to bring it to fruition.

Chief Executive's Response and Recommendation:

Response:

The CE welcomes the submission by An Taisce/Green-Schools Ireland and looks forward to ongoing and enhanced collaboration.

1. Comment Noted.
2. Comment Noted. It is proposed to update Action TR 1.8 to reflect this advice as per recommendation below.
3. Comment Noted. It is proposed to update Action TR 1.8 to reflect this advice as per recommendation below.

4. Comment Noted. It is proposed to update Action TR 1.8 to reflect this advice as per recommendation below.

Recommendation:

1. No proposed changes to draft Plan.
2. 3. and 4. Amend Action TR 1.8 *Support the Safer Routes to Schools programme and School Streets Initiative, providing education and training on cycle buses and walking buses. Investigate the feasibility of infrastructure requests from Walkability Audits and Cyclability audits carried out by Green Schools and others. Collaborate with Green Schools Travel Team to support Active Travel Initiatives including ‘no-idling’ campaigns and Park ‘n’ Stride schemes.*

Submission by:	Centre for Environmental Living and Training (CELT)
Issues Raised/Relevant Chapter(s):	Climate Change Overview
Summary of Submission:	
<p>CELT is a community oriented charity that focuses on environmental living and training.</p> <ol style="list-style-type: none"> 1. Governance and Leadership: Adopt a Rights of Nature motion, promote permaculture principles and designs, consider donut economics and health and wellbeing metrics. Educate and empower the public and other stakeholders such as those in the agricultural sector, with an educational program that is inclusive, based on climate science and regenerative culture. Promote diets and lifestyles that have lower carbon footprints. <p>Diversification of agriculture is very important as Ireland is not food secure, and is vulnerable to overseas climate shocks. Lead by example by implementing Green Public Procurement for all local authority events.</p> <ol style="list-style-type: none"> 2. Energy and Built environment: Do not develop data centres or support biomethane production. Endorse the Fossil Fuel Non-proliferation Treaty. Support local energy co-ops, including the option of the coop use of public land for the generation of renewable energy and support community ownership of local microgeneration projects. Initiate and support One Planet Living developments and community innovation projects. 3. Transport: Create safe cycling and walking infrastructure, including safe routes to school, supporting sustainable, community led walking & cycling buses. Adopt best practice from countries with well-developed walking and cycling infrastructure, following the hierarchy of transport, prioritising and fast-tracking active travel networks and public transport infrastructure. Provide adequate parking for bikes. 	

Do not build the ring road; Use the money to transform Galway and make it a city where active travel and public transport is the easiest way to get around. Consider a light rail system. Discourage the use of SUVs in built-up areas. Make neighbourhoods more permeable and pedestrian friendly, with pedestrianised towns & villages, 30kmph speed limits and French style crossings that are red for cars by default.

4. Communities and Partnership: Increase the climate action fund and strengthen local authorities, address the issue of access to land for community groups. Audit public land and buildings, and consider the potential for community projects, provide additional staff resources and support food security and sustainable local food production.
5. Circular Economy: Prioritise reduce and reuse strategies over recycling; promote water refill stations, reusable cups, and libraries of stuff; work with shops to promote refill stations reduce plastic packaging, setting targets on reduction of plastic waste streams from local businesses; support co-operatives; only support regenerative and non-extractive businesses.
6. Land Use and Green Infrastructure: Adopt a Rights of Nature Motion within the Council. Carry out an ecological audit of local authority land. Manage hedgerows and woodland in accordance with best practice. Work closely with community groups on expanding native woodland and high nature value habitats, planting more trees and native hedgerows. Introduce a pesticide ban.

Support regenerative bioregional plans and projects amongst staff and communities, including community gardens and allotments, community-supported agriculture projects, nurseries and neighbourhoods cooperatives. Support wild zones and wildflower meadows, utilising only locally grown seed, trees and perennial pollinator planting schemes, on LA-owned land.

7. Adaptation to Climate Risk: Use regenerative, permaculture and nature-based solutions for flooding and other climate risks, such as catchment-based solutions, wetland storage sites, artificial beaver dams, and marine permaculture, increasing the opportunity for carbon sequestration. Compensating farmers/landowners for lost livelihoods. Develop a network of native Irish woodlands that manage flooding while also creating biodiversity rich wildlife corridors & greenways, and offer each local household shared access to wood for thinning, tending, coppicing and firewood collection. Support community farms. Support more research on tipping points and feedback loops.
8. Climate and food security: Promote diversification of farming to insulate against climate shocks within food markets which could have serious repercussions. Include food security in climate risk assessments. Make public land and buildings available for local community food hubs, co-ops and community supported agriculture projects to support local food production. Support and encourage community gardens and public Edible Landscaping projects. Develop a Local Food Policy to include institutional

recognition for Local Food Producers, Green Procurement, access to land supports and a mapping system. We want farmers to earn a fair living and support them to take climate action. A multi-department, integrated approach to reviving and climate proofing our rural communities is required.

Chief Executive's Response and Recommendation:

Response:

The CE welcomes this detailed and informative submission from the Centre for Environmental Living and Training (CELT).

1. Comment noted. A Rights of Nature Motion submitted by the Green Recovery Group is under consideration by the Climate and Biodiversity SPC of Galway County Council. Climate Action training is mandatory for all local authority staff and elected representatives. It is proposed to carry out a Public Awareness Campaign under Action CP 1.2. It is proposed to amend the wording of this action as set out in the recommendation below. The uncertainties and risks are dealt with in detail in the Climate Change Risk Assessment prepared as part of the development of the draft Plan.

While the draft Plan is ambitious to reflect our leadership role on climate action, the Plan does not include actions whereby their implementation and achievement fall outside our role, remit, and governance. The interaction between the local government and agricultural sectors are limited by statutory remit, however, there are a number of areas where the local authorities can play a role in supporting the agricultural sector to reduce emissions. It is considered that the actions set out in the plan, in particular under Goal 6 Land Use and Natural Environment, reflect our remit in this area.

2. Comments noted. Spatial planning is addressed in the County Development Plan 2022-2028 which includes the Local Authority Renewable Energy Strategy. This was developed in line with the National Planning Framework which has 10 Strategic Objectives which cover many of the issues raised in point 2 including Transition to a Low Carbon and Carbon Resilient Society.

Support for local energy co-ops is dealt with under Actions CP 1.1 and LN 2.2 which will be updated to take into account of this submission as set out in the Recommendations below.

3. Comment noted. We will continue to work with key stakeholders including Galway City Council, National Transport Authority and Transport Infrastructure Ireland to play our part in establishing high quality active travel and sustainable travel infrastructure and support an increased uptake of travel by sustainable modes in line with the Galway County Development Plan 2022-2028, the Galway Transport Study, the Galway County Transport Planning Strategy, the Walking and Cycling

Study and Local Transport Plans and the Galway County Council Climate Action Plan.

Many of the actions suggested will be possible under the existing actions under Objective TR 1 *Support active travel and modal shift to advance sustainable, accessible, and safe mobility.*

Spatial planning for the Galway City Ring Road is dealt with under the County Development Plan 2022-2028.

4. Comments noted. The Climate Action Fund is financed by National Government and administered by the Local Authority. Under Action LN 2.2 it is proposed to carry out an audit of local authority property. It is proposed to amend this action to reflect this submission.

Support will be provided to communities to take climate action as set out in the Actions under Objective CP1. As noted, food and waste is one of the themes for community projects eligible for funding. It is proposed to amend Action CP 1.1 as recommended below to take account of this submission.

5. Comment noted. Actions under Objective CE1 aim to support communities, businesses and individuals to reduce the generation of waste and increase the quantity of waste reused and recycled. It will be possible to implement many of the suggestions in this submission within these actions.
6. Comment noted. A Rights of Nature Motion submitted by the Green Recovery Group is under consideration by the Climate and Biodiversity SPC of Galway County Council. Under Action LN 2.2 it is proposed to carry out an audit of local authority property. Action in relation to woodland and hedgerows is addressed in part under Action LN 2.3. It is proposed to update this action to reflect this advice as per recommendation below.

Actions under Objective LN2 will also support many of the suggestions in this section of the submission. Climate Action training is mandatory for all local authority staff and elected representatives. There are a number of actions related to education with the draft Climate Action Plan including GL 3.1, CP 1.2, CP 1.3, CP 1.5, CP 1.10, CP 1.12. It is envisaged that any education programme developed will cover a wide range of actions including sustainable land management, sustainable living, planetary boundaries and biodiversity.

While the draft Plan is ambitious to reflect our leadership role on climate action, the Plan does not include actions whereby their implementation and achievement fall outside our role, remit, and governance. The interaction between the local government and agricultural sectors are limited by statutory remit, however, there are a number of areas where the local authorities can play a role in supporting the agricultural sector to reduce emissions. It is considered that the actions set out in the plan, in particular under Goal 6 Land Use and Natural Environment, reflect our

remit in this area. Under Action LN 1.2 we will work with the BIA Innovation Centre to support climate action in the food and agriculture sector.

7. Comments noted. Actions under Objective AD1, particularly AD 1.1, AD 1.3, AD 1.6 and LN 1.1 deal with this section of the submission. In particular, Action AD 1.7 commits to working with other stakeholders to identify and support Minor and Major Flood Protection and Flood Proofing Schemes throughout the county that supports Nature Based Solutions to increase co-benefits.
8. Comment noted, and Galway County Council look forward to working stakeholders on this matter. While the draft Plan is ambitious to reflect our leadership role on climate action, the Plan does not include actions whereby their implementation and achievement fall outside our role, remit, and governance. The interaction between the local government and agricultural sectors are limited by statutory remit, however, there are a number of areas where the local authorities can play a role in supporting the agricultural sector to reduce emissions. It is considered that the actions set out in the plan, in particular under Objective LN1 and its associated actions, reflect our remit in this area. Under Action LN 1.2 we will work with the BIA Innovation Centre to support climate action in the food and agriculture sector.

Recommendation:

1. Amend Action CP 1.2: Establish a training, information and support programme for **individuals**, community groups **and** community event organisers on Climate Action and Biodiversity. **Ensure that the programme takes into account the needs of vulnerable groups and those at risk from climate change.** Carry out annual training programme.
2. Amend Action CP 1.1: **Support Community Action in the areas of community energy projects, travel, shopping and recycling, environmental action and food and waste including community gardens.** Administer Community Climate Action Fund and support communities in the implementation of the projects. No proposed changes to draft Plan.

Amend Action LN 2.2: Audit local authority land **and buildings**, carry out ecological/habitat surveys and highlight areas at risk (as well as areas which are thriving or providing sequestration services) and those suitable for restoration and enhanced carbon storage, **community purposes or as ~~also identifying potential~~ wildlife corridors for protection through statutory plans.**

3. No proposed changes to draft plan.
4. Amend Action LN 2.2: Audit local authority land **and buildings**, carry out ecological/habitat surveys and highlight areas at risk (as well as areas which are thriving or providing sequestration services) and those suitable for restoration and

enhanced carbon storage, **community purposes** or as ~~also identifying potential~~ wildlife corridors for protection through statutory plans.

Amend Action CP 1.1: **Support Community Action in the areas of community energy projects, travel, shopping and recycling, environmental action and food and waste including community gardens.** Administer Community Climate Action Fund and support communities in the implementation of the projects.

5. No proposed changes to draft plan.
6. Amend Action LN 2.3: Conduct a tree cover survey and devise and adopt a tree management policy that recognises the ecosystem services provided by existing woodland habitat **and hedgerows** and seeks to retain and support such habitats.
7. No proposed changes to draft Plan.
8. No proposed changes to draft Plan.

Submission by:	Michael Gormally
Issues Raised/Relevant Chapter(s):	Our Climate Actions
Summary of Submission:	
<p>It is critical that supporting the development of renewable energy sources in Co. Galway is undertaken with a long-term view of sustainability rather than primarily on the basis of local environmental impacts during the lifetime of the renewable energy project in question. Once renewable energy projects are built and operational, the affected habitats will be excluded from any potential future habitat restoration policies during the project lifetime. This is particularly relevant in the context of recent developments on promoting habitat restoration such as the recent Nature Conservation Law and the Report of the Citizens’ Assembly on Biodiversity Loss. An example of the above would be a planning application for a wind farm on a cut-over raised bog in Co. Galway which can negatively affect biodiversity and water quality as well as increasing carbon loss from this habitat through the required drainage and infrastructure that wind farms require. While the wind farm is operational, this bog will effectively be excluded from any restoration policies for a period of up to 25 years resulting in a lost opportunity for Galway County Council to support biodiversity, ecosystem function and reduce carbon loss.</p>	
Chief Executive’s Response and Recommendation:	
Response:	
The CE welcomes the submission by Michael Gormally.	

Comment Noted. Spatial planning is addressed in the County Development Plan 2022-2028 and related Local Authority Renewable Energy Strategy which include policy objectives that supports the protection of aquatic and wetland habitat.

Recommendation:

No proposed changes to draft Plan.

Submission by:	Third Space Galway
Issues Raised/Relevant Chapter(s):	Climate Change Overview
Summary of Submission:	
<p>Third Space Galway was established to bridge strands of contemporary creative practice and community action.</p> <ol style="list-style-type: none"> Governance and Leadership Staff and public representative, as well as public and agricultural stakeholders, awareness and training is essential. We can no longer afford business as usual, and our local leaders need to know that there will be strong resistance to policies that take us in the wrong direction. Training should include information on Permaculture, Tipping Points and Feedback Loops. Promote diets and lifestyles that have lower carbon footprints. All public catering events at Local Authority level should promote local organic where possible, plant-based diets. Promote diversification of agriculture to help insulate Irish citizens from food system shocks abroad. Energy and Built Environment: Do not develop data centres or support biomethane production. Endorse the Fossil Fuel Non-proliferation Treaty. Support local energy co-ops, including the option of the coop use of public land for the generation of renewable energy and support community ownership of local microgeneration projects. Initiate and support One Planet Living developments and community innovation projects. Transport: Create safe cycling and walking infrastructure, including safe routes to school, supporting sustainable, community led walking & cycling buses. Adopt best practice from countries with well-developed walking and cycling infrastructure, following the hierarchy of transport, prioritising and fast-tracking active travel networks and public transport infrastructure. Provide adequate parking for bikes. <p>Do not build the ring road; Use the money to transform Galway and make it a city where active travel and public transport is the easiest way to get around. Consider a light rail system. Discourage the use of SUVs in built-up areas. Make neighbourhoods more</p>	

permeable and pedestrian friendly, with pedestrianised towns & villages, 30kmph speed limits and French style crossings that are red for cars by default.

4. Communities and Partnership: Increase the climate action fund and strengthen local authorities, address the issue of access to land for community groups. Audit public land and buildings, and consider the potential for community projects, provide additional staff resources and support food security and sustainable local food production.
5. Circular Economy: Prioritise reduce and reuse strategies over recycling; promote water refill stations, reusable cups, and libraries of stuff; work with shops to promote refill stations reduce plastic packaging, setting targets on reduction of plastic waste streams from local businesses; support co-operatives; only support regenerative and non-extractive businesses.
6. Land Use and Green Infrastructure: Adopt a Rights of Nature Motion within the Council. Carry out an ecological audit of local authority land. Manage hedgerows and woodland in accordance with best practice. Work closely with community groups on expanding native woodland and high nature value habitats, planting more trees and native hedgerows. Introduce a pesticide ban.

Support regenerative bioregional plans and projects amongst staff and communities, including community gardens and allotments, community-supported agriculture projects, nurseries and neighbourwoods cooperatives. Support wild zones and wildflower meadows, utilising only locally grown seed, trees and perennial pollinator planting schemes, on LA-owned land.

7. Adaptation to Climate Change: Use regenerative, permaculture and nature-based solutions for flooding and other climate risks, such as catchment-based solutions, wetland storage sites, artificial beaver dams, and marine permaculture, increasing the opportunity for carbon sequestration. Compensating farmers/landowners for lost livelihoods. Develop a network of native Irish woodlands that manage flooding while also creating biodiversity rich wildlife corridors & greenways, and offer each local household shared access to wood for thinning, tending, coppicing and firewood collection. Support community farms. Support more research on tipping points and feedback loops.
8. Food Security: Promote diversification of farming to insulate against climate shocks within food markets which could have serious repercussions. Include food security in climate risk assessments. Make public land and buildings available for local community food hubs, co-ops and community supported agriculture projects to support local food production. Support and encourage community gardens and public Edible Landscaping projects. Develop a Local Food Policy to include institutional recognition for Local Food Producers, Green Procurement, access to land supports and a mapping system. We want farmers to earn a fair living and support them to take climate action. A multi-

department, integrated approach to reviving and climate proofing our rural communities is required.

Chief Executive's Response and Recommendation:

Response:

The CE welcomes the detailed and informative submission from Third Space Galway.

1. Comment noted. Climate Action training is mandatory for all local authority staff and elected representatives. There are a number of actions related to education with the draft Climate Action Plan including GL 3.1, CP 1.2, CP 1.3, CP 1.5, CP 1.10, CP 1.12. It is envisaged that any education programme developed will cover a wide range of actions including sustainable land management, sustainable living, planetary boundaries and biodiversity and Galway County Council would welcome the input of Third Space Galway when designing the content of the public education material. It is proposed to amend the wording of Action CP 1.2. as set out in the recommendation below.

The uncertainties and risks are dealt with in detail in the Climate Change Risk Assessment prepared as part of the development of the draft Plan.

The drive to reduce emissions from and improve environmental performance of Irish agriculture is underscored by recent policies and strategies such as the revised EU Common Agricultural Policy, the EU's Farm to Fork Strategy and nationally, the Food Vision 2030 strategy and the Climate Action Plan 2024. A target of 25% emissions reductions has been set for the Agricultural Sector.

While the draft Plan is ambitious to reflect our leadership role on climate action, the Plan does not include actions whereby their implementation and achievement fall outside our role, remit, and governance. The interaction between the local government and agricultural sectors are limited by statutory remit, however, there are a number of areas where the local authorities can play a role in supporting the agricultural sector to reduce emissions. It is considered that the actions set out in the plan, in particular under Goal 6 Land Use and Natural Environment, reflect our remit in this area.

2. Comment noted. Spatial planning is addressed in the County Development Plan 2022-2028 which includes the Local Authority Renewable Energy Strategy. This was developed in line with the National Planning Framework which has 10 Strategic Objectives which cover many of the issues raised in point 2 including Transition to a Low Carbon and Carbon Resilient Society.
3. Comment noted. We will continue to work with key stakeholders including Galway City Council, National Transport Authority and Transport Infrastructure Ireland to play our part in establishing high quality active travel and sustainable travel

infrastructure and support an increased uptake of travel by sustainable modes in line with the Galway County Development Plan 2022-2028, the Galway Transport Study, the Galway County Transport Planning Strategy, the Walking and Cycling Study and Local Transport Plans and the Galway County Council Climate Action Plan.

Many of the actions suggested will be possible under the existing actions under Objective TR 1 *Support active travel and modal shift to advance sustainable, accessible, and safe mobility.*

Spatial planning for the Galway City Ring Road is dealt with under the County Development Plan 2022-2028.

4. Comment noted. The Climate Action Fund is financed by National Government and administered by the Local Authority. Under Action LN 2.2 it is proposed to carry out an audit of local authority property. It is proposed to amend this action to reflect this submission.

Support will be provided to communities to take climate action as set out in the Actions under Objective CP1. As noted, food and waste is one of the themes for community projects eligible for funding. It is proposed to amend Action CP 1.1 as recommended below to take account of this submission.

5. Comment noted. Actions under Objective CE1 aim to support communities, businesses and individuals to reduce the generation of waste and increase the quantity of waste reused and recycled. It will be possible to implement many of the suggestions in this submission within these actions.
6. Comment noted. A Rights of Nature Motion submitted by the Green Recovery Group is under consideration by the Climate and Biodiversity SPC of Galway County Council.

Actions under Objective LN2 will also support many of the suggestions in this section of the submission. Under Action LN 2.2 it is proposed to carry out an audit of local authority property. Action in relation to woodland and hedgerows is addressed in part under Action LN 2.3. It is proposed to update this action to reflect this advice as per recommendation below.

Climate Action training is mandatory for all local authority staff and elected representatives. There are a number of actions related to education with the draft Climate Action Plan including GL 3.1, CP 1.2, CP 1.3, CP 1.5, CP 1.10, CP 1.12. It is envisaged that any education programme developed will cover a wide range of actions including sustainable land management, sustainable living, planetary boundaries and biodiversity.

7. Comment noted. Actions under Objective AD1, particularly AD 1.1, AD 1.3, AD 1.6, AD 1.7 and LN 1.1 deal with this section of the submission. In particular, Action AD 1.7 commits to working with other stakeholders to identify and support Minor and Major Flood Protection and Flood Proofing Schemes throughout the county that supports Nature Based Solutions to increase co-benefits.
8. Objective LN1 refers, Galway County Council look forward to working with communities and the relevant agencies on this matter where it falls within our remit. While the draft Plan is ambitious to reflect our leadership role on climate action, the Plan does not include actions whereby their implementation and achievement fall outside our role, remit, and governance. The interaction between the local government and agricultural sectors are limited by statutory remit, however, there are a number of areas where the local authorities can play a role in supporting the agricultural sector to reduce emissions. It is considered that the actions set out in the plan, in particular under Objective LN1 and its associated actions, reflect our remit in this area. Under Action LN 1.2 we will work with the BIA Innovation Centre to support climate action in the food and agriculture sector.

Recommendation:

1. Amend Action CP 1.2: Establish a training, information and support programme for individuals, community groups and community event organisers on Climate Action and Biodiversity. Ensure that the programme takes into account the needs of vulnerable groups and those at risk from climate change. Carry out annual training programme.
2. Amend Action CP 1.1: Support Community Action in the areas of community energy projects, travel, shopping and recycling, environmental action and food and waste including community gardens. Administer Community Climate Action Fund and support communities in the implementation of the projects. No proposed changes to draft Plan.

Amend Action LN 2.2: Audit local authority land and buildings, carry out ecological/habitat surveys and highlight areas at risk (as well as areas which are thriving or providing sequestration services) and those suitable for restoration and enhanced carbon storage, community purposes or as ~~also identifying potential~~ wildlife corridors for protection through statutory plans.

3. No proposed changes to draft Plan.
4. Amend Action LN 2.2: Audit local authority land and buildings, carry out ecological/habitat surveys and highlight areas at risk (as well as areas which are thriving or providing sequestration services) and those suitable for restoration and enhanced carbon storage, community purposes or as ~~also identifying potential~~ wildlife corridors for protection through statutory plans.

Amend Action CP 1.1: Support Community Action in the areas of community energy projects, travel, shopping and recycling, environmental action and food and waste including community gardens. Administer Community Climate Action Fund and support communities in the implementation of the projects.

5. Amend Action LN 2.2: Audit local authority land and buildings, carry out ecological/habitat surveys and highlight areas at risk (as well as areas which are thriving or providing sequestration services) and those suitable for restoration and enhanced carbon storage, community purposes or as ~~also identifying potential~~ wildlife corridors for protection through statutory plans.
6. Amend Action LN 2.3: Conduct a tree cover survey and devise and adopt a tree management policy that recognises the ecosystem services provided by existing woodland habitat and hedgerows and seeks to retain and support such habitats.
7. No proposed changes to draft Plan.
8. No proposed changes to draft Plan.

Submission by:	Comhairle Ceantar na nOileán CTR
Issues Raised/Relevant Chapter(s):	Our Climate Actions
Summary of Submission:	
<ol style="list-style-type: none"> 1. Governance and Leadership. <ol style="list-style-type: none"> 1.1. Develop Climate Action officers, having space within the local library network to have a go to area for the public to engage in climate science projects and knowledge. Furth more this could be developed further through local community groups and BCP community facilities. 1.2. Establish an Energy Bureau HUB in each library network, local community groups and BCP community facilities. 1.3. Develop Community Energy officers and Community Climate Officers within the county. GCC to support this measure through training supports for the Galway PPN Network. 1.4. Support local SEC's (sustainable energy communities) with the county by supporting them through the allocation of GCC buildings through SEAI's Community Energy Grants Scheme. This would ensure any gains in carbon credits would stay locally creating community energy funds locally. 	

2. Energy and Built environment

Support SEC's in terms of feasibility funding to develop "Central District Heating Projects" Currently applicants under SEAI WHS are receiving single upgrade measures, as a result a majority of the work being carried out in the county by SEAI'S WHS is not bringing homes to the specified target of a B2. GCC should sign an MOU with SEAI seeking that all home under WHS should hit the B2 baseline set by government.

3. Transport:

3.1. CCG to work with stakeholders locally so as create an active travel stagey for Cenatar na nOileán and it's 5 brides across the 5 island.

3.2. Create safe cycling and walking infrastructure- especially safety routes to schools.

3.3. Create and support the funding for coffee docks in BCP community centres, this would encourage more citizens to use public transport. Citizen would have a go to place , so as they can wait for their public transport.

4. Circular Economy

Priorities the 3R's through each CAS site in the county, currently huge improvements can be made. Each CAS facility in the county should have clear criteria in the tender in terms of reuse and promoting the 3R's with the CAS facility. Promote water refill stations in public spaces. Promote reusable keep cups in general and within county council facilities. Develop repair cafes with the county.

Chief Executive's Response and Recommendation:

Response:

The CE welcomes the submission by Comhairle Ceantar na nOileán CTR and looks forward to ongoing collaboration in relation to these important issues.

1. Comment noted. Galway County Council will continue to engage with the public both in terms of education and funding support for climate action. The library network is one outlet used for this support. The degree of support in terms of funding and staff resources available will be dependent on allocations from potential funding sources including the National Government and the EU. Galway County Council will endeavour to maximise on these potential funding sources.
2. Comment noted. Galway County Council would welcome the input of Comhairle Ceantar na nOileán CTR when implementing Action EB 1.2 *Conduct a feasibility study to identify and assess the potential areas and sources for district heating in the county.*

Targets and funding for the Warmer Homes Scheme are managed by SEAI and are outside the remit of Galway County Council.

3. Comment noted. Galway County Council would welcome the input of Comhairle Ceantar na nOileán CTR when implementing Action TR 1. 4 *Work with communities to identify potential active travel, greenway and public transport projects and support modal shift.*
4. Comment noted. Galway County Council would welcome the input of Comhairle Ceantar na nOileán CTR when implementing Action CE 1.1 . These proposals are dealt with under Action CE 1.3, CE 1.1 and CE 1.2.

Recommendation:

1. No proposed changes to draft Plan.
2. No proposed changes to draft Plan.
3. No proposed changes to draft Plan.
4. No proposed changes to draft Plan.

Submission by:	Dr M Sheehy Skeffington
Issues Raised/Relevant Chapter(s):	Foreward
Summary of Submission:	
<p>We are repeatedly reminded that we approach global catastrophe, yet progress, if any, is far too slow. Global action starts at home -no better place than at county level. Let Galway Co. Co. set the high standards.</p> <p>Many of the goals and actions in the Local Authority Climate Action Plan (LACAP) are useful, indeed essential. But at this stage, with 96 seconds left on the Doomsday Clock, we need a balance evaluation of what is possible,</p> <p>a) in terms of costs and available budget b) in terms of an achievable timeframe.</p> <ol style="list-style-type: none"> 1. What are the priorities, when will they be budgeted for, for what amount and when will they be implemented? 2. Transport: Since the traffic problems arguably have one of the greatest impacts on the daily work/ life balance, it is imperative that the issue be addressed by providing alternative transport system. Update the 2012 survey to give the current weekday total 	

number of cars travelling into/ through the city. Identify and quantify the traffic load of the main travel routes within and from outside Galway city. Update an estimate of the cost of the ring road and set that budget aside for developing a coherent public transport system for Galway city and a 30-50km radius. Continue making the rail tracks from Athenry a double-track system. Add a minimum of 3 extra train services to facilitate commuters' flexibility. Add to the fleet of a) 30/ 35-seater buses to service city suburbs and housing estates b) 45/ 50-seater buses servicing satellite towns including e.g. Oranmore, Loughrea, Gort, Spiddal, Oughterard, Tuam, etc. Provide year-round park and ride facilities around Galway and main conurbations. Ensure these are regularly serviced with shuttle/ feeder buses to main public transport routes if necessary. Transport access within Galway city, as well as the bigger towns is vital to avoid use of private cars. Assess and upgrade cycle paths within the city. Provide easy access to shopping centres and malls for alternative transport to private cars. Impose a tax on SUVs within urban areas. Even if electric (which most are not), these consume greater materials in construction, pollute more through large tyres, take up more parking/ street space than ordinary vehicles. They are not the solution!

3. Land Use and Natural Environment: Agriculture comprises 44% of total GHG emissions in Galway (Table 2 in LACAP). Combined with LULUCF, this totals 60%. This sector is a priority. Whereas the farming community provides the backbone of the rural economy, it is sustainable farming that is essential for the conservation of many habitats of EU and national importance. Local authorities are in a key position to engage with the farming community to provide adequate support and subsidy for low-intensity farming, such that it is perceived as a viable option. To date this does not receive the attention or funding it requires. It can serve to reduce and off-set the high emissions of more intensive farming. Low intensity farming has lower carbon emissions, greater carbon storage and lower run-off of soil, water and fertilizers from land. Galway Co. Co. is noteworthy in having a Biodiversity Officer, so it should set target aims for a reduction in each of these climate- affecting losses. Prioritise regions where HNV farmland occurs as an indicator of low-intensity farming. Provide advice and – preferably also – financial support to encourage extensification of farming. Quantify on a per ha basis the positive outcomes for reduction in emissions and run-off losses. Flood mitigation may involve a reduction on drain construction, since these bring further floodwaters to already-overfull rivers. Encourage peatland restoration such that the growing surface absorbs not only water by carbon. In contrast, reduce the amount of drainage schemes that result in down-stream flooding
4. Action LN 2.3 Hedgerows comprise woody species, including trees, that absorb water from wet land and sequester carbon. A large network of hedgerows can provide these ecosystems services, as well as providing habitat for pollinators, birds that control pests) and mammals. Encourage tree conservation and hedgerow maintenance at low-intensity. Reduce County Council hedgerow cutting and encourage less destructive cutting than that of flailing.
5. Action LN 2.4 Galway County Council has been seen to use herbicide to plant wildflower meadows. It has also sprayed roadsides with herbicide in many places. Such practice is

not only damaging to plant communities, but sets an example such that landowners regularly spray km of roadside with herbicide. This is expensive, bad for human health and damages the environment, often encouraging run-off, flooding and erosion. Develop a protocol for the conservation of roadsides that does not use the above practices.

Chief Executive's Response and Recommendation:

Response:

The CE welcomes the detailed submission by Dr M Sheehy Skeffington.

1. Comment noted. The draft Plan is ambitious in nature and it is noted that additional resources will be required both in terms of staff and funding to carry out the actions identified in the plan. Commitment has already been received in relation to some of the actions through Government Departments or existing projects. Committing to actions through the adoption of the draft Plan will assist us in applying for funding or resources where existing resources are inadequate.

As set out in Section 6 of the draft Plan, following approval an Implementation Plan/Summary will be developed for each action, which will set out in detail how the action will be delivered including noting the responsible department and timescales. Further details in relation to potential funding sources is also set out in this section.

2. Comment noted. Many of the suggestions set out under point 2 do not fall directly under the remit of Galway County Council. We will continue to work with key stakeholders including Galway City Council, National Transport Authority and Transport Infrastructure Ireland to play our part in establishing high quality active travel and sustainable travel infrastructure and support an increased uptake of travel by sustainable modes in line with the Galway County Development Plan 2022-2028, the Galway Transport Study, the Galway County Transport Planning Strategy, the Walking and Cycling Study and Local Transport Plans.

The GCTPS specifically includes commitments to investigate appropriate expansions to Park and Ride facilities within the Galway County area on approaches to the Galway City area.

3. Comment noted. The drive to reduce emissions from and improve environmental performance of Irish agriculture is underscored by recent policies and strategies such

as the revised EU Common Agricultural Policy, the EU's Farm to Fork Strategy and nationally, the Food Vision 2030 strategy and the Climate Action Plan 2024. A target of 25% emissions reductions has been set for the Agricultural Sector.

While the draft Plan is ambitious to reflect our leadership role on climate action, the Plan does not include actions whereby their implementation and achievement fall outside our role, remit, and governance. The interaction between the local government and agricultural sectors are limited by statutory remit, however, there are a number of areas where the local authorities can play a role in supporting the agricultural sector to reduce emissions. It is considered that the actions set out in the plan, in particular under Goal 6 Land Use and Natural Environment, reflect our remit in this area.

4. Comment noted. Actions as suggested are addressed in part under Actions LN 2.3. It is proposed to update this action to reflect this advice as per recommendation below.
5. Comment noted. This issue is addressed in the Sustainable Plant Management Plan which was adopted by Galway County Council in 2023 and aligns with Action LN 2.4 *Implement a pesticide and herbicide reduction plan for Galway County Council.*

Recommendation:

1. No proposed changes to draft Plan.
2. No proposed changes to draft Plan.
3. No proposed changes to draft Plan.
4. Amend Action LN 2.3: Conduct a tree cover survey and devise and adopt a tree management policy that recognises the ecosystem services provided by existing woodland habitat and hedgerows and seeks to retain and support such habitats.
5. No proposed changes to draft Plan.

4.3 Summary of Chief Executive’s recommendations for Proposed Modifications

The following provides a list of modifications which have been proposed by the Chief Executive, on foot of public consultation of the draft Plan. The proposed modifications are listed by the draft Plan 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.

No.	Draft CAP Section and Page	Proposed Modifications	SEA & AA Assessments
1.	Chapter 4. Our Climate Actions Section 4.2 Energy and Built Environment Page 57	Action EB 3.1 The provision of public Waste Water Treatment Plants in towns and villages that are not currently served is vital to facilitate compact and sustainable growth. Support Irish Water Uisce Éireann and the national government to prioritise locations and seek funding for provision of these services.	Appropriate Assessment Screening Examination: The above modification is minor in nature and does not relate to land use activities. This modification will not have the potential to trigger land use activities, that could in turn, conceivably trigger likely significant effects to European Sites. The above proposed modification outlined in this Chief Executive’s report does not require Stage II Appropriate Assessment.
2.	Chapter 4. Our Climate Actions Section 4.3 Transport Page 61	Action TR 1.8 Support the Safer Routes to Schools programme and School Streets Initiative, providing education and training on cycle buses and walking buses. Investigate the feasibility of infrastructure requests from Walkability Audits and Cyclability audits carried out by Green Schools and others. Collaborate with Green Schools Travel Team to support Active Travel Initiatives including ‘no-idling’ campaigns and Park ‘n’ Stride schemes.	Appropriate Assessment Screening Examination: The above modification is minor in nature and does not relate to land use activities. This modification will not have the potential to to trigger land use activities, that could in turn, conceivably trigger likely significant effects to European Sites. The above proposed modification outlined in this Chief Executive’s report does not require Stage II Appropriate Assessment. SEA Screening Examination: This action modification relates to investigation and feasibility and do not, in and of themselves, give rise to landuse effects. Should future landuse projects arise, these

			would be subject to compliance with the statutory planning and consenting process including the environmental protection measures in the Galway CDP 2022 -2028. No additional mitigation measures required and no SEA required.
3.	Chapter 4. Our Climate Actions Section 4.4 Communities and Partnership Page 67	Action CP 1.1: Support Community Action in the areas of community energy projects, travel, shopping and recycling, environmental action and food and waste including community gardens. Administer Community Climate Action Fund and support communities in the implementation of the projects.	Appropriate Assessment Screening Examination: Whilst it is noted that the supports set out in the proposed modification text above could conceivably result in land use activities that could in turn trigger likely significant effects to European Sites it is noted that the mitigation measures set out in the NIS of the Draft CAP will provide sufficient safeguards to ensure that any land use activities arising from this modification will be designed and implemented in a manner that avoids the potential for negative impacts to European Sites. Given that no mitigation measures, over and above those set out in the NIS of the draft CAP are required to be implemented with respect to this proposed amendment, it is found that mitigation measures set out in the NIS for the draft CAP provide sufficient protection to ensure that this proposed amendment will not have the potential to trigger likely significant effects to European Sites.
4.	Chapter 4. Our Climate Actions	Action CP 1.2: Establish a training, information and support programme for individuals, community groups and community event organisers on Climate Action and Biodiversity. Ensure that the programme	Appropriate Assessment Screening Examination: The above modification is minor in nature and does not relate to land use activities. This modification will not have the potential to trigger land use activities, that could in turn, conceivably trigger likely

	Section 4.4 Communities and Partnership Page 67	takes into account the needs of vulnerable groups and those at risk from climate change. Carry out annual training programme.	significant effects to European Sites. The above proposed modification outlined in this Chief Executive's report does not require Stage II Appropriate Assessment.
5.	Chapter 4. Our Climate Actions Section 4.4 Communities and Partnership Page 67	Action CP 1. 3 Establish network of communities to disseminate information from the DZ areas across the country (CONNECTED Project). Work in partnership with the PPN to encourage and support climate action in the community. Consider the inclusion of additional categories related to Climate Action in the Cathaoirleach Awards.	Appropriate Assessment Screening Examination: The above modification is minor in nature and does not relate to land use activities. This modification will not have the potential to trigger land use activities, that could in turn, conceivably trigger likely significant effects to European Sites. The above proposed modification outlined in this Chief Executive's report does not require Stage II Appropriate Assessment.
6.	Chapter 4. Our Climate Actions Section 4.6 Land Use and Green Infrastructure Page 78	Action LN 2.2: Audit local authority land and buildings, carry out ecological/habitat surveys and highlight areas at risk (as well as areas which are thriving or providing sequestration services) and those suitable for restoration and enhanced carbon storage, community purposes or as also identifying potential wildlife corridors for protection through statutory plans.	Appropriate Assessment Screening Examination: The above modification is minor in nature and does not relate to land use activities. This modification will not have the potential to trigger land use activities, that could in turn, conceivably trigger likely significant effects to European Sites. The above proposed modification outlined in this Chief Executive's report does not require Stage II Appropriate Assessment.
7.	Chapter 4. Our Climate Actions Section 4.6 Land Use and Green Infrastructure Page 78	Action LN 2.3: Conduct a tree cover survey and devise and adopt a tree management policy that recognises the ecosystem services provided by existing woodland habitat and hedgerows and seeks to retain and support such habitats.	Appropriate Assessment Screening Examination: The above modification is minor in nature and does not relate to land use activities. This modification will not have the potential to trigger land use activities, that could in turn, conceivably trigger likely significant effects to European Sites. The above proposed modification outlined in this Chief Executive's report does not require Stage II Appropriate Assessment.
8.	Chapter 4. Our Climate Actions,	Galway County Council will endeavour to ensure monitoring arrangements and networks remain fit for purpose, such that that the data generated	Appropriate Assessment Screening Examination: The above modification is minor in nature and does not relate to land use activities. This modification will not have the potential to trigger

	Section 4.7 Adaptation to Climate Risk, Page 80, final paragraph	from monitoring, can be used by decision makers such as Local Authority emergency planning teams or Met Éireann flood forecasting teams, EPA air pollution forecasting teams, etc. subject to data sharing agreements.	land use activities, that could in turn, conceivably trigger likely significant effects to European Sites. The above proposed modification outlined in this Chief Executive's report does not require Stage II Appropriate Assessment.
9.	Chapter 4. Our Climate Actions Section 4.7 Adaptation to Climate Risk Page 82	Action AD 1.1: Collaborate with OPW and other relevant stakeholders in assessing the likely impacts of climate change, including sea level rise, coastal erosion and flooding, on the built environment and heritage sites. Prioritise areas for further assessment and seek funding/support to mitigate the risk. Assist CARO in the development of a register of critical infrastructure, systems and assets at risk from existing and projected climate events. KPI - Assessment Complete. Register Developed. Areas prioritised. Funding sought. Projects implemented.	Appropriate Assessment Screening Examination: The above modification is minor in nature and does not relate to land use activities. This modification will not have the potential to trigger land use activities, that could in turn, conceivably trigger likely significant effects to European Sites. The above proposed modification outlined in this Chief Executive's report does not require Stage II Appropriate Assessment.
10.	Chapter 5. Aran Islands Decarbonising Zone Pages 88, 90 and 92	Replace Comhar Cumann with Comharchumann.	Appropriate Assessment Screening Examination: The above modification is minor in nature and does not relate to land use activities. This modification will not have the potential to trigger land use activities, that could in turn, conceivably trigger likely significant effects to European Sites. The above proposed modification outlined in this Chief Executive's report does not require Stage II Appropriate Assessment.
11.	Chapter 2. Climate Change Overview. Section Pg 89	Starting with a group purchase scheme in 2027 2011 with just three electric cars, there are now more than 15 electric cars on Árainn alone.	This modification is minor in nature. This alteration merely propose to add clarification or amended context setting text for Plan provisions and these will not result in significant environmental

			effects. Consequently, the above Proposed amendments outlined in this Chief Executive’s Report do not require SEA.
12.	Chapter 5. Aran Islands Decarbonising Zone Page 96	Action DZ 1. 4 Support Irish Water Uisce Éireann to identify baseline emissions related to water delivery and treatment, update baseline emissions assessment and identify opportunities to reduce associated emissions. Assess risks related to drought conditions.	This modification is minor in nature. This alteration merely proposes to add clarification or amended context setting text for Plan provisions and these will not result in significant environmental effects. Consequently, the above Proposed amendments outlined in this Chief Executive’s Report do not require SEA.
13.	Chapter 5. Aran Islands Decarbonising Zone Pages 95 and 96	Change Objective D1 to Objective DZ1	Appropriate Assessment Screening Examination: The above modification is minor in nature and does not relate to land use activities. This modification will not have the potential to trigger land use activities, that could in turn, conceivably trigger likely significant effects to European Sites. The above proposed modification outlined in this Chief Executive’s report does not require Stage II Appropriate Assessment.
14.	Chapter 5. Aran Islands Decarbonising Zone Page 97	Action DZ 1.5 Improve understanding of emissions related to agriculture and LULUCF and update baseline emissions assessment. (Note: Some of the emissions data related to agriculture and LULUCF in the Decarbonisation Zone is based on national averages. The actual emissions may lower due to the nature of farming practices in this region).	Appropriate Assessment Screening Examination: The above modification is minor in nature and does not relate to land use activities. This modification will not have the potential to trigger land use activities, that could in turn, conceivably trigger likely significant effects to European Sites. The above proposed modification outlined in this Chief Executive’s report does not require Stage II Appropriate Assessment.
15.	Chapter 5. Aran Islands Decarbonising Zone Page 97	Action DZ 1. 9 Support the identification and development of appropriate community energy facilities. Investigate the potential for developing the unused landfill site on the islands into a community owned solar farm.	Appropriate Assessment Screening Examination: The above modification is minor in nature and the setting out of a requirement under this action to investigate the potential for developing the unused landfill site on the islands into a community owned solar farm will not result in land use activities. This modification will not have the potential to trigger land use

			<p>activities, that could in turn, conceivably trigger likely significant effects to European Sites. The above proposed modification outlined in this Chief Executive's report does not require Stage II Appropriate Assessment.</p> <p>SEA Screening Examination: This action modification relates to investigation and feasibility and do not, in and of themselves, give rise to landuse effects. Should future landuse projects arise, these would be subject to compliance with the statutory planning and consenting process including the environmental protection measures in the Galway CDP 2022 -2028. No additional mitigation measures required and no SEA required.</p>
16.	Chapter 5. Aran Islands Decarbonising Zone Page 98	Action DZ 1.12 Identify barriers to reducing emissions within Decarbonisation Zone and identify appropriate policy objectives related to renewable energy generation for consideration in the next iteration of the County Development Plan.	Appropriate Assessment Screening Examination: The above modification is minor in nature and does not relate to land use activities. This modification will not have the potential to trigger land use activities, that could in turn, conceivably trigger likely significant effects to European Sites. The above proposed modification outlined in this Chief Executive's report does not require Stage II Appropriate Assessment.
17.	Islands Decarbonising Zone Page 98	Action DZ 1.15 ensure that they are aligned with the conservation objectives for the Inishmore Island SAC, Inishmann Island SAC, Inisheer Island SAC and Inishmore SPA	Appropriate Assessment Screening Examination: The above modification is minor in nature and does not relate to land use activities. This modification will not have the potential to trigger land use activities, that could in turn, conceivably trigger likely significant effects to European Sites. The above proposed modification outlined in this Chief Executive's report does not require Stage II Appropriate Assessment.

18.	Chapter 6. Implementation and Reporting, Section 6.3 Monitoring and Reporting, Page 101	<p>To ensure that delivery is timely, the implementation of this Plan will be monitored via an in-house tracking system which will enable departments and sections to report progress made against the actions they are leading on. The reporting system will be managed by the Climate Action Team and all information reported will be collated by the team for the purposes of evaluation and reporting.</p> <p>Progress will be reported to and reviewed by the Senior Management Team and SPC on a quarterly basis. On an annual basis progress will be communicated to the elected members of the Council. Additionally, where relevant, progress on key actions will be reported through the various methods available to the Council for example through the Monthly Management Report, SPCs, Galway County Council website and social media, to increase transparency and foster collaboration.</p>	<p>Appropriate Assessment Screening Examination: The above modification is minor in nature and does not relate to land use activities. This modification will not have the potential to trigger land use activities, that could in turn, conceivably trigger likely significant effects to European Sites. The above proposed modification outlined in this Chief Executive’s report does not require Stage II Appropriate Assessment.</p>
<p>SEA Screening summary: the above amendments are minor in nature, providing additional commitment to monitoring and additional partners. These are not identified as giving rise to significant environmental effects. Taking into account the measures that have been already integrated into the Draft CAP that provide for and contribute towards environmental protection, environmental management and sustainable development, it is identified that any potential effects arising from the proposed modifications outlined in this Chief Executive’s Report either are present already (beneficial) and will be further contributed towards; or will be mitigated so as not to be significant (adverse). In addition, some alterations merely propose to add clarification or amended context setting text for Plan provisions and these will not result in significant environmental effects. Consequently, the above Proposed amendments outlined in this Chief Executive’s Report do not require SEA.</p>			

The following provides a list of minor modifications related to place names and typographical errors. Any further grammatical or typographical errors will be addressed as they are found.

No.	Draft CAP Section and Page	Proposed Modifications	SEA & AA Assessments
1.	Correction to placenames throughout document -	<ul style="list-style-type: none"> • Replace all references to Aran Islands, Aran Islands with Oileáin Árann. • Replace all references to Inis Mór, Inis Móir, Inishmore, Árann, with Árainn (Inis Mór) • Replace all references to Inis Mheáin with Inis Meáin, • Replace all references to Inisbofin with Inishbofin 	<p>These modifications are minor in nature. These alterations merely propose to add clarification or amended context setting text for Plan provisions and these will not result in significant environmental effects. Consequently, the above Proposed amendments outlined in this Chief Executive's Report do not require SEA.</p>
2.	Chapter 4. Our Climate Actions Section Section 4.4 Communities and Partnership Page 65	Community and Energy Projects	<p>This modification is minor in nature. This alteration merely propose to add clarification or amended context setting text for Plan provisions and these will not result in significant environmental effects. Consequently, the above Proposed amendments outlined in this Chief Executive's Report do not require SEA.</p>

5 Conclusions

This Chief Executive's Report on the submissions received to the draft Plan during Public Consultation is hereby submitted to the Elected Members of the Local Authority, for their consideration.

The Elected Members have 4 weeks to consider this Chief Executive's Report. On the 19th February 2024, a Special Council Meeting of Galway County Council will take place to 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 draft Galway County Council Climate Action Plan, 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.

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.

Within thirty 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.

Appendix 1: SEA Screening Conclusion and Determination and AA Screening Conclusion and Determination



SCREENING FOR STRATEGIC ENVIRONMENTAL ASSESSMENT DETERMINATION

Under Section 9 (4) of SI No. 435 of 2004 of the European Communities (Environmental Assessment of Certain Plan and Programmes) Regulations 2004 (S.I. No. 435 of 2004) (hereafter, 'the SEA Regulations'), as amended by the European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations, 2011 (S.I. 200 of 2011), for the

DRAFT GALWAY COUNTY COUNCIL CLIMATE ACTION PLAN 2024 -2029

The Screening for Strategic Environmental Assessment (SEA) determination regarding whether or not the proposed modifications to the Galway County Council Climate Action Plan 2024-2029 would be likely to have significant effects on the environment is being made under the above Regulations.

As part of this determination, the Council is considering whether or not implementation of the modifications to the Galway County Council Climate Action Plan (CAP) 2024 -2029 would be likely to have significant effects on the environment, taking account of relevant criteria set out in Schedule 2A of the above Regulations. These criteria are taking into account as follows:

1. The characteristics of the plan having regard, in particular, to:

the degree to which the Plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,

The CAP is being prepared and has been on public consultation with the SEA Environmental Report and the Natura Impact Statement. The proposed modifications to the CAP arising from the public consultation and assessed in the accompanying SEA Screening report do not significantly alter the findings of the SEA, and AA of the draft Galway County Council Climate Action Plan to date.

the degree to which the Plan influences other plans, including those in a hierarchy,

The Plan is being prepared in the context of the Climate Action and Low Carbon Development (Amendment) Act 2021. Ireland is now on a legally binding path to net-Zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade. The Act provides the framework for Ireland to meet its international and EU climate commitments and to become a leader in addressing climate change.

As required by the 2021 Act, Galway County Council is preparing their first Local Authority Climate Action Plan (LA-CAP) which must be adopted by the Elected Members before 23rd February 2024.

Taking the above and the examination of likely significant environmental effects in the SEA Screening report, the proposed modifications to the CAP would not be likely to result in significant environmental effects.

the relevance of the Plan in the integration of environmental considerations in particular with a view to promoting sustainable development,

The draft Galway County Council CAP has been subject to full SEA and AA and has integrated environmental considerations with a view to promoting climate change actions in the plan area. Taking the above and the examination of likely significant environmental effects in the SEA Screening report, the proposed modifications would not be likely to result in significant environmental effects.

Environmental problems relevant to the plan

These are presented in the SEA ER and include, *inter alia*,

- Water quality
- Flooding
- Climate change impacts
- Biodiversity loss

the relevance of the plan to the implementation of European Union legislation on the environment (e.g. plans linked to waste-management or water protection).

The plan considers and integrates European Union legislation on the environment including those relating to topics such as Water protection. Taking the above and the examination of likely significant environmental effects in the SEA Screening report, the proposed modifications would not be likely to result in significant environmental effects.

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

the probability, duration, frequency and reversibility of the effects,

No such effects are identified associated with the proposed modifications to the Galway County Council CAP.

the cumulative nature of the effects,

No such effects are identified associated with the proposed modifications to the Galway County Council CAP

the transboundary nature of the effects

No such effects are identified associated with the proposed modifications to the Galway County Council CAP

the risks to human health or the environment (e.g. due to accidents),

No such effects are identified associated with the proposed modifications to the Galway County Council CAP

the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).

No such effects are identified associated with the proposed modifications to the Galway County Council CAP

the value and vulnerability of the area likely to be affected due to:

(a) special natural characteristics or cultural heritage

The wider area supports a range of European Sites including SACs and SPA. The Galway County Council CAP has been subject to full SEA and AA and appropriate mitigation measures integrated. No such effects are identified associated with the proposed modifications to the Galway County Council CAP..

(b) exceeded environmental quality standards or limit values,

No such effects are identified associated with the proposed modifications to the Galway County Council CAP

(c) intensive land-use,

No such effects are identified associated with the proposed modifications to the Galway County Council CAP

(d) the effects on areas or landscapes which have a recognised national, European Union or international protection status.

No such effects are identified associated with the proposed modifications to the Galway County Council CAP.

With reference to the foregoing information, it is determined that the proposed modifications to the Galway County Council CAP would not be likely to result in significant effects and therefore full SEA is not required to be undertaken on the proposed changes to the Galway County Council Climate Action Plan.

Eileen Ruane

Eileen Ruane, Director of Services

23/01/2024

Date



GALWAY COUNTY COUNCIL CLIMATE ACTION PLAN

APPROPRIATE ASSESSMENT DETERMINATION IN ACCORDANCE WITH REGULATION 42(11) OF THE EUROPEAN COMMUNITIES (BIRDS & HABITATS) REGULATIONS 2011 - 2021

1.0 LEGISLATIVE CONTEXT

Article 6(3) of the Habitats Directive defines the requirements for assessment of projects and plans for which likely significant effects on European Sites may arise. The European Communities (Birds and Natural Habitats) Regulations, 2011 – 2021 (the Habitats Regulations) transpose into Irish law Directive 2009/147/EC (the Birds Directive) and Council Directive 92/43/EEC (the Habitats Directive). These Regulations require competent authorities, to carry out an Appropriate Assessment of plans and projects that, alone or in combination with other plans or projects, would be likely to have significant effects on European Sites in view of best scientific knowledge and European Site conservation objectives. This requirement is transposed into Irish Law by Part 5 of the Habitats Regulations and Part XAB of the Planning and Development Act, 2000 (as amended).

According to Regulation 42(1) of the European Communities (Birds and Natural Habitats) Regulations 2011 – 2021, the competent authority has a duty to:

- Determine whether the proposed Plan or Project is directly connected to or necessary for the management of one of more European Sites; and, if not,
- Determine if the Plan or Project, either individually or in combination with other plans or projects, would be likely to have a significant effect on the European Site(s) in view of best scientific knowledge and the Conservation Objectives of the site(s).

2.0 DESCRIPTION OF THE CLIMATE ACTION PLAN (CAP)

As required by the Climate Action and Low Carbon Development (Amendment) Act 2021, Galway County Council has prepared the first Local Authority Climate Action Plan which must be adopted by the Elected Members before 23rd February 2024. This will continue the work undertaken under the first Climate Adaptation Strategy 2019-2024 which was non statutory.

Local authorities are key drivers in advancing climate policy at the local level and the Galway County Council CAP aims to strengthen the alignment between national climate policy and local circumstances with the prioritisation and acceleration of evidence-based measures, to assist in the delivery of the climate neutrality objective for Galway County Council.

Galway County Council will use its CAP in planning how it will reduce greenhouse gas emissions and increase climate resilience from across its own assets and infrastructure, whilst also taking on a broader role to influence, facilitate and co-ordinate the climate actions of communities and other stakeholders and what it will do to advocate for climate action in the County of Galway. In order to ensure that the CAP is centred around a strong understanding of the role and remit of Galway County Council on climate action, the Plan is being developed through the following framework.

- Fully accountable: Targeted actions for areas where Galway County Council has full accountability for climate action within their own operations.
- Influence: Actions for where Galway County Council can influence businesses, communities, and individuals in the delivery of local climate action through the functions and services they provide.
- Coordination: Actions for where Galway County Council can coordinate and facilitate local and community action bringing together stakeholders in partnership to achieve climate action related projects.
- Advocate: Actions aligned to Galway County Councils role as advocate on climate action through raising awareness, communicating, informing, and engaging in open dialogue on the topic.

The Plan includes a range of actions across the six theme areas of Governance and Leadership, Energy and Built Environment, Transport, Communities and Enterprise, Circular Economy Land Use and Green Infrastructure, and Adaptation to Climate Risk.

3.0 APPROPRIATE ASSESSMENT PROCESS

3.1 SCREENING FOR APPROPRIATE ASSESSMENT

This Galway County Council CAP is not considered to be directly connected with, or necessary to, the management of any European Sites.

As such, a screening for appropriate assessment of the Plan was carried out in accordance with Regulation 42(1) of the European Communities (Birds and Natural Habitats) Regulations 2011-2021, to assess, in view of best scientific knowledge and the conservation objectives of relevant European Sites, if the Plan or Project, either individually or in combination with other plans or projects, would be likely to have a significant effect on these European Sites. The Screening Report was prepared by Doherty Environmental Consultants (DEC) Ltd. The Screening Report for Appropriate Assessment concluded under Regulation 42(6) that an appropriate assessment was required, as the potential for the Plan, individually or in combination with other Plans and projects, to result in likely significant effects to European Sites could not be ruled out at the screening stage.

The Plan is considered to have the potential to have a significant effect on the European Sites, either individually or in combination with other Plans or projects, and is hence subject to appropriate assessment of its implications for relevant sites in view of those sites' conservation objectives.

3.2 NATURA IMPACT STATEMENT

A Natura Impact Statement was prepared by DEC Ltd on behalf of Galway County Council, and was made available as part of the consultation period for 6 weeks from the 10th November to the 22nd of December 2023. The Natura Impact Assessment concluded that the draft CAP will not have a significant adverse impact on European Sites provided the mitigation measures

outlined in Section 7 of the NIS are adopted in the CAP and at future stage of any land use projects facilitated by the Actions of the CAP.

3.3 CONSULTATION

Twenty-two valid submissions were received in relation to the draft CAP. These were reviewed in the Chief Executives Report of the submissions in relation to the draft CAP and informed the finalisation of the CAP with the provision of modifications to the draft CAP. The modifications set out in the Chief Executives Report have been subject to screening for Appropriate Assessment and it was found that none of the modifications will have the potential to result in likely significant effects to European Sites, over and above those identified in the NIS for the draft CAP.

3.4 MITIGATION

Future land use projects facilitated by the Galway County Council CAP will apply a range of measures that will mitigate potential for significant adverse effects to European Sites. While the applicability of particular measures will be dependent on the specific location, nature and scale of such projects, the mitigation measures set out in the Natura Impact Statement provide the necessary safeguards to ensure that such projects will be designed and implemented in a manner that provides for the full protection of the integrity of European Sites in view of their conservation objectives.

4.0 CONCLUSION

Pursuant to its obligations under Regulation 42(1) of the European Communities (Birds and Natural Habitats) Regulations 2011 – 2021 Galway County Council has conducted an Appropriate Assessment of the Galway County Council Climate Action Plan. Having regard to:

The Natura Impact Statement prepared by DEC Ltd. the assessment of likely impacts and the mitigation measures outlined therein;

The incorporation of all mitigation as outlined in the NIS within the Galway County Council CAP so as to avoid adverse effects to European Sites;

The fact that all projects facilitated by the Galway County Council CAP shall be required to conform with all mitigation measures outlined in the CAP and the NIS;

Galway County Council has determined, pursuant to Regulation 42(11) of the European Communities (Birds and Natural Habitats) Regulations 2011 – 2021 that the Galway County Council CAP will not adversely affect the conservation objectives or integrity of any European Sites.

Eileen Ruane

Eileen Ruane, Director of Services

23/01/2024

Date