

**CHIEF EXECUTIVE'S REPORT ON  
SUBMISSIONS RECEIVED TO THE  
CARLOW COUNTY COUNCIL DRAFT  
CLIMATE ACTION PLAN 2024-2029**

**NOVEMBER 2023  
ENVIRONMENT DEPARTMENT  
CARLOW COUNTY COUNCIL**



COMHAIRLE CONTAE  
CHEATHARLACH  
CARLOW COUNTY COUNCIL



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## 1 Introduction

### 1.1 Purpose of the Report

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

The Draft Plan includes a range of actions across the five theme areas of Governance & Leadership, Built Environment & Transport, Natural Environment & Green Infrastructure, Communities: Resilience & Transition, and Sustainability & Resource Management.

Pursuant to Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021, notice of the preparation of the Carlow County Council Draft Climate Action Plan 2024-2029, was given on Tuesday 12<sup>th</sup> September 2023. Submissions or observations with regard to the Draft Plan and Environmental Reports (Strategic Environmental Assessment and Appropriate Assessment) were invited for a period of 6 weeks, from Wednesday 13<sup>th</sup> September 2023 until Wednesday 25<sup>th</sup> October 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 Climate Action Plan;
- summarises the issues raised by the persons, organisations or bodies in the submissions or observations;
- gives the response and recommendation of the Chief Executive to the issues raised; and
- outlines any proposed modifications to the Draft Plan, on foot of the Public Consultation process.

This Chief Executive's Report on Submissions Received is hereby submitted to the Elected Members of the Local Authority, for their consideration. The Elected Members have 6 weeks to consider this Chief Executive's Report, in accordance with the requirements of the Climate (Amendment) Act 2021. Elected Members will be briefed on the 8th January 2024 to provide an overview of the Chief Executive's Report and on 15<sup>th</sup> January 2024 Council Meeting of Carlow 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.

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

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

The Elected Members shall give approval for the Local Authority 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.

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

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

### **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 is aligned to the Government's overall National Climate Objective, which seeks to pursue and achieve, by no later than the end of 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. The Draft Plan demonstrates a coherent approach to climate action across the administrative and political structure of the local authority.

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

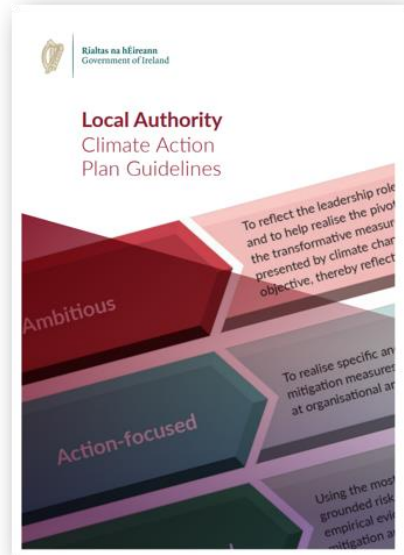
- actively translate national climate policy to local circumstances with the prioritisation and acceleration of evidence-based measures;
- assist in the delivery of the climate neutrality objective at local and community levels; and
- identify and deliver a Decarbonising Zone (DZ) within the local authority 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 Carlow County Council will be responsible for enhancing climate resilience, increasing energy efficiency and reducing greenhouse gas emissions, across its own assets, services and infrastructure, to which it is 'fully accountable' for, whilst also demonstrating a broader role of 'influencing', 'coordinating and facilitating' and 'advocating' for other sectors, to meet their own climate targets and ambitions.

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



## 2 The Public Consultation Process

### 2.1 Outline of the Public Consultation Process

In accordance with the provisions of Section 16 of the Climate (Amendment) Act 2021, the Draft Climate Action Plan underwent statutory public consultation, from Wednesday 13<sup>th</sup> September 2023 until Wednesday 25<sup>th</sup> October 2023 inclusive.

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

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

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

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

### 2.2 Key Elements of the Public Consultation Process

Carlow County Council conducted 2 non statutory pre-draft consultations in the preparation of the draft document and then completed the statutory consultation process with the draft climate change action plan. Details on the processes are outlined as follows:

#### **Pre Draft Consultation 1 - Establishing awareness and engagement (non-statutory)**

At the statutory meeting of Carlow County Council in January 2023, Elected Members were informed of the legislative requirement under the Climate Action and Low Carbon Development (Amendment) Act 2021 to prepare and adopt a Local Authority Climate Action Plan for Carlow County Council. Members were advised of the LACAP statutory process, scope

and inclusion of a Decarbonising Zone as set out in the aforementioned act and in draft Guidelines issued by the Department of the Environment, Climate and Communications.

In order to ensure that local based information and opinions were considered and included, Carlow County Council invited observations and recommendations for consideration in the draft Climate Action Plan. Members of the public were invited to "Have their say" on Carlow County Council's Consult Carlow portal, Consult.ie.

This online portal is a specifically designed website where members of the public can participate in Carlow County Council's public consultations by viewing relevant documents and making submissions/ observations.

Submissions were accepted from the 16<sup>th</sup> January 2023- 6<sup>th</sup> February 2023.

There were 2 online submissions received.

### **Pre Draft Consultation 2 - Preparation of the Draft – "Have your say" (non-statutory)**

In order to ensure that local views and concerns were considered and increase understanding of the scope of the LACAP Carlow County Council commenced a non-statutory consultation process on 1<sup>st</sup> May 2023 with submissions invited until 16<sup>th</sup> June 2023.

A range of in person and online public meetings were facilitated at different times and in different locations where the public could meet members of the Climate Action Team, receive an informative briefing presentation and examine existing policy documents and discuss their climate concerns.

A presentation was made outlining the following:

- Legislative requirements under the Climate Action and Low Carbon Development (Amendment) Act 2021 to prepare and adopt a Local Authority Climate Action Plan for Carlow County Council.
- The role of the Public Sector
- The framework of the LACAP
- Statutory timelines for delivery of the LACAP
- Scope of the LACAP
- GHG reduction targets for Carlow County Council
- Carlow County Council Decarbonising Zone

Members of the Planning, Environment, Climate & Bio-Diversity Action, Energy & Agriculture SPC were advised and updated at their meeting on 9<sup>th</sup> May 2023.

Elected Members of Carlow County Council received a presentation and were updated/briefed at the Carlow County Council statutory May meeting on 8<sup>th</sup> May 2023.

Public meetings took place as follows:

Area	Date	Attendance
<b>Carlow Town</b>	02/05/2023	24
<b>Bagenalstown</b>	04/05/2023	13
<b>Online</b>	09/05/2023	4
<b>Borris</b>	11/05/2023	6
<b>Carlow Town</b>	16/05/2023	7
<b>Tullow</b>	18/05/2023	9
<b>Hacketstown</b>	23/05/2023	3
<b>Rathvilly</b>	25/05/2023	1
<b>Online</b>	30/05/2023	3
<b>Carlow County Council Staff &amp; PPN</b>	01/06/2023	47
<b>Carlow Chamber of Commerce</b>	08/06/20253	15

There were 4 submissions received.

All submissions received were considered in the making of the draft LACAP.

The Climate Action Regional Office ( CARO) carried out five facilitated sectoral engagement workshops as follows:

Theme	Date
<b>Heritage &amp; Biodiversity (in conjunction with Heritage Council)</b>	25th April 2023
<b>Transportation</b>	22nd May 2023
<b>Built Environment and Land use Planning</b>	23rd May 2023
<b>Community Development and Enterprise</b>	30th May 2023
<b>Land use Change (incl. Agriculture and Water)</b>	31st May 2023



Stakeholders included:

- Department of the Environment, Climate and Communications (DECC)
- Department of Rural and Community Development (DRCD)
- Department of Transport (DoT)
- Department of Housing, Local Government and Heritage (DHLGH)
- Department of Tourism, Culture, Arts, Gaeltacht, Sports, and Media (DTCAGSM)
- Department of Agriculture, Food, and the Marine (DAFM)
- Office of the Planning Regulator (OPR)
- National Parks and Wildlife Services (NPWS)
- National Transport Authority (NTA)
- Zero Emission Vehicles Ireland (ZEVI)
- Transport Infrastructure Ireland (TII)
- Arts Council of Ireland
- Sustainable Energy Authority of Ireland (SEAI)
- Office of Public Works (OPW)
- Local Government Management Agency (LGMA)
- Geological Survey of Ireland (GSI)
- Environmental Protection Agency (EPA)
- Inland Fisheries (IF)
- Mét Éireann (ME)
- Uisce Éireann
- Regional Assemblies, represented by Southern Regional Assembly (SRA)
- Climate Action Regional Offices (CARO)
- Local Enterprise Office Network (LEO)
- Local Authority Waters Programme (LAWPRO)
- Local Authority Services National Training Group (LASNTG)
- Electric Ireland Super homes
- The Heritage Council
- Office of the Planning Regulator
- Accelerating Change Together (ACT)

Methodology used by Carlow County Council for consultation with key stakeholders include:

- Local Newspaper Notice – Carlow Nationalist
- Local Radio Advertisement - KCLR
- Social Media Advertisement
- Local Authority Website
- Parish Newsletters
- Local Notes local Newspaper – Carlow Nationalist
- Carlow PPN
- Communications with Statutory Stakeholders
- Public Display in County Buildings of Carlow County Council
- Public Display in Library branches

- Presentation to Staff members of Carlow County Council
- Presentation to Elected members of Carlow County Council
- Presentation to Members of Planning, Environment, Climate and Bio-Diversity Action, Energy and Agriculture Strategic Policy Committee.
- Notification of adjoining Local Authorities
- The Climate Action Regional Office engaged with the Departments responsible for the development of sectoral adaptation plans inviting them to review the local authority adaptation strategies and to make submissions.
- The Climate Action Regional Office also identified key high-level stakeholders according to their importance and relevance to the subject matter of Local Authority Adaptation Strategies and invited them to review the local authority adaptation strategies and to make submissions

### **Statutory Public consultation on the draft Local Authority Climate Action Plan 2024-2029**

The Statutory Public consultation on the draft Local Authority Climate Action Plan 2024-2029 commenced on 13<sup>th</sup> September, with submissions invited until 4pm on 25<sup>th</sup> October.

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

- A public notice appeared in the Carlow Nationalist on 12<sup>th</sup> September 2023.
- Extensive use of the Council's social media networks was undertaken throughout the consultation process.
- A total of 6 Radio interviews were completed by the Climate Action Coordinator with KCLR and BEAT FM at the commencement of, and during the public consultation process to encourage participation by the public in the plan making process.
- The publication of the draft Carlow County Council Climate Action Plan and commencement of the statutory consultation period was noted at the September 5<sup>th</sup> meeting of the Planning, Environment, Climate and Bio-Diversity Action, Energy and Agriculture Strategic Policy Committee (SPC). A presentation was made to members outlining the statutory plan making process and timeline for delivery.
- The publication of the draft Carlow County Council Climate Action Plan and commencement of the statutory consultation period was approved at the September meeting of Carlow County Council. Elected Members were invited to attend an online Q&A event to take place on 14<sup>th</sup> September.
- Direct communication was made with prescribed bodies and Local Key Stakeholders.

### 2.3 Public Information Events

In addition to the public events held in the non-statutory consultations during the statutory public consultation period, members of the Climate Action Team invited members of the public to obtain clarification on issues relating to the Draft plan and offered support in understanding the procedures in making submissions or observations on same.

Copies of supporting policies of Carlow County Council were available on site including:

- Carlow County Development Plan 2022-2028
- Carlow County Council Biodiversity Action Plan 2023-2025
- County Carlow Green Infrastructure Strategy

A number of in person Public Information Events took place as follows:

<b>Location</b>	<b>Date</b>	<b>Attendance</b>
Bagenalstown Library	Tuesday 19 <sup>th</sup> September	6
Tullow Library	Wednesday 20 <sup>th</sup> September	2
Carlow Central Library	Thursday 21 <sup>st</sup> September	8

Elected members and members of the Planning, Environment, Climate and Bio-Diversity Action, Energy and Agriculture Strategic Policy Committee were invited to attend an online Q&A session on 14<sup>th</sup> September 2023. There were no issues of concern or clarification raised at this meeting.

A presentation was made to the members of the Carlow Town Forum on 26<sup>th</sup> September outlining the following:

- Legislative requirements under the Climate Action and Low Carbon Development (Amendment) Act 2021 to prepare and adopt a Local Authority Climate Action Plan for Carlow County Council.
- The role of the Public Sector
- The framework of the LACAP
- Statutory timelines for delivery of the LACAP
- Scope of the LACAP
- GHG reduction targets for Carlow County Council
- Carlow County Council Decarbonising Zone

Members of Carlow Town Forum were invited to make submissions on the Draft plan.

### 3 Details of the Submissions

#### 3.1 Introduction

A total of 12 valid submissions and observations were received, the breakdown of which is as follows:

Submission Type	Number
Online Portal Submissions	4
Posted / Handed Submissions	0
Email Submissions	9
<b>Total Submissions</b>	<b>13</b>

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

The following submission themes were used:

1. Submissions from Government Bodies/ Departments and adjoining Local Authorities
2. Submissions from Private Industry
3. Submissions from Utilities.
4. Submissions from Organisations / Community Groups
5. Submissions from the General Public/ Individuals

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

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

Appendix 1 includes a list of the persons, organisations and bodies that made written submissions. Each submission has been assigned an independent reference.

#### 3.3 Chief Executive's Responses and Recommendations

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

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

- do not sit within the scope of the Draft Climate Action Plan;
- go beyond its scope but lie within the scope of the local authority;
- go beyond the functions of the local authority; and/or

- are not directly related to the provisions of the Draft Plan or climate actions,
- are already provided for within the Draft Climate Action Plan

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

#### 4 Categorisation, Summary and Responses to Issues Raised

All 13 valid submissions and observations were read, analysed and summarised. The report takes the following format to address issues raised in the submissions and observations received.

##### 4.1 Submissions CLW-C67-1

Submission CLW-C67-1	Submission Summary	CE Response and Recommendation
Elizabeth Bradley	<p>Encourage behaviour change and build awareness in purchasing food with a low carbon footprint.</p> <p>Collaboration and agreed targets between the local authorities, farmers\ food producers and the public would have to be agreed.</p>	<p><b>CE Response:</b> The submission from Elizabeth Bradley, is welcomed and contents are acknowledged.</p> <p>Food production does not fall under the remit of Carlow County Council. Carlow County Council will continue to provide assistance to local food producers across its statutory functions and continue to raise awareness of purchasing food with low carbon footprint through environmental awareness, shop local and community campaigns run by various departments.</p> <p><b>CE Recommendation</b> No modification is proposed to the Draft Carlow County Council Local Authority Climate Action Plan 2024 – 2029 on the basis of this submission for the reasons set out above.</p>

## 4.2 Submission CLW-C67-2

Submission CLW-C67-2	Submission Summary	CE Response and Recommendation
<p>Gas Networks Ireland</p>	<p>Gas Networks Ireland (GNI) supports the Carlow Climate Action Plan 2024-2029. GNI provide information on what Biomethane, Green Hydrogen and Compressed Natural Gas are in their submission.</p> <p>They note these renewable gases could be included under Strategic Goal 5. Sustainability &amp; Resource Management – particularly biomethane considering the role it can play in relation to the circular economy.</p> <p>GNI also notes that compressed gas can play a key role in the decarbonisation of Heavy Goods Vehicles (HGV) particularly when combined with biomethane and could be included under Strategic Goal 2 Built Environment &amp; Transport.</p>	<p><b>CE Response:</b> The submission from Gas Networks Ireland is welcomed and contents are acknowledged.</p> <p>Carlow County Council recognise the importance of the provision of a decarbonised energy supply, as highlighted in the County Development Plan 2022-2028 and in Carlow County Council's Renewable Energy Strategy. Climate Actions SRM 1.4, 1.5, 1.6, 1.10, 1.11 and 1.12 under Sustainability &amp; Resource Management support and facilitate the local authority, businesses and the community in reducing their carbon footprint which includes the use of renewable energy.</p> <p>Strategic Goal 2 Built Environment &amp; Transport, Actions B1.1, B1.2, B1.3, under Buildings and T1.1 and T1.2 under Transport support the use of renewable energy including but not restricted to renewable gases.</p> <p><b>CE Recommendation</b> No modification is proposed to the Draft Carlow County Council Local Authority Climate Action Plan 2024 – 2029 on the basis of this submission for the reasons set out above.</p>

### 4.3 Submission CLW-C67-3

Submission CLW-C67-3	Submission Summary	CE Response and Recommendation
<p>Mary Ryan</p>	<p>The submission noted their disappointment that the scope relates only to activities and assets of the Local Authority.</p> <p>That reference is made to the Various National, Sectoral and Regional plans however there is no information in relation to policy implementation affecting County Carlow or where responsibility lies.</p> <p>Commented that stating that “Carlow County Council has a strong commitment to mainstreaming climate action across its own operations and functions - doesn't make it so” and that their belief was “the reality does not support this.</p> <p>Noted that the tables are well presented and the presence of action lists is welcome</p> <p>It was good to see the feasibility study in relation to creating a self sufficient nursery (NE1.9 ) for public realm planting not so good to see (Srm 1.9) to increase the range of services available on an online platform -unless the online platforms are greatly improved</p> <p>Noted the greatest hazard for Carlow will be river flooding and that it would be good to see some plans to address this.</p> <p>Also the increased incidence of extreme precipitation and drought would indicate the need for increased reservoir capacity however nothing in the plan with regard to this.</p> <p>While accepting and appreciating the efforts of the Environmental dept to present the document both in Carlow Town and other towns and villages, it was noted that the levels</p>	<p><b>CE Response:</b></p> <p>The submission from Mary Ryan is welcomed and contents are acknowledged.</p> <p>The scope of the Climate Action Plan is set out in the statutory Local Authority Climate Action Plan Guidelines, which were followed in the preparation of the draft Plan.</p> <p>The actions presented in the LACAP demonstrate the commitment of Carlow County Council to mainstream climate action across its operations and functions over the next 5 years.</p> <p>Carlow County Council is committed to progressing the availability of online services for the public to enable ease of access to services while facilitating a reduction in the need for service users to travel to obtain services. Services such as Motor tax online have been greatly received by the public. Carlow County Council has recently reviewed its website and online platform and will be releasing it's new website in late 2023.</p> <p>Carlow Town benefited greatly from the Carlow Flood Relief scheme safe guarding houses from flooding. Carlow County Council works closely with Office of Public Works (OPW) with regards to preparing plans and Flood Risk Management Maps. Flood Risk plans and mapping are available through the OPW website <a href="http://www.floodinfo.ie">www.floodinfo.ie</a>. Action B1.11 of the Climate Action Plan includes for the Review the Major Emergency Plan &amp; Flood Plan to ensure incorporation of climate risk.</p> <p>Úisce Eireann (UE) are the sanitary authority and provider of public drinking water. The National Water Resource Plan (NWRP)</p>



	<p>of engagement were disappointing (as with most public consultation documents). Looking for this to be addressed and a review of the methods undertaken.</p> <p>Requested an executive summary report</p>	<p>prepared by UE is their framework to understand and address water demand. UE is implementing a Climate Risk and Resilience Assessment project to ensure that the impact of climate change is considered against the performance of their assets.</p> <p>In addition to the statutory consultations set out in the LACAP Guidelines extensive efforts were made by Carlow County Council to engage with staff, the Members and the public in the preparation of the draft Climate Action Plan. These are documented within the Plan and CE report.</p> <p>An executive summary report will be prepared with the final document.</p> <p><b>CE Recommendation</b> No modification is proposed to the Draft Carlow County Council Local Authority Climate Action Plan 2024 – 2029 on the basis of this submission for the reasons set out above.</p>
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#### 4.4 Submissions CLW-C67-4

Submission CLW-C67-4	Submission Summary	CE Response and Recommendation
<p>Community Gardens Ireland</p>	<p>Section C1.6 and C1.7 be changed from “Develop” to “Develop, adopt and implement”.</p> <p>Carlow County Council to ensure the implementation of Section C1.6 and C1.7</p> <p>Carlow County Council to commit to preserving existing allotments and community gardens provided and increasing the number of allotments and community gardens provided over the lifetime of the Climate Action Plan. The KPI for this will be the number of allotments and community gardens in Carlow.</p> <p>Carlow County Council to commit to performing a review of idle, vacant and derelict land within Carlow County Council that could be used for community growing purposes.</p> <p>Carlow County Council to commit to opening a seed library, similar to the one established within Wicklow County Council and in Hollyhill Library in Cork City.</p> <p>Carlow County Council to recognise National Allotments and Community Gardens Week by celebrating the role of community growing within communities throughout Carlow during this week each year</p>	<p><b>CE Response:</b></p> <p>The submission for Community Gardens Ireland is welcomed and contents are acknowledged.</p> <p>Carlow County Council recognise the significant Climate contributions made by community gardens and allotments and will continue to support them.</p> <p>The development and promotion of Community Garden Guidelines are based on the RU:RBAN project are intended to offer advice to those who wish to set up community gardens/allotments.</p> <p>Carlow County Council are not in a position at present to offer a seed library.</p> <p>Carlow County Council will recognise National Allotments and Community Gardens Week.</p> <p><b>CE Recommendation</b></p> <p>No modification is proposed to the Draft Carlow County Council Local Authority Climate Action Plan 2024 – 2029 on the basis of this submission for the reasons set out above.</p>

#### 4.5 Submissions CLW 5

Submission CLW 5	Submission Summary	CE Response and Recommendation
<p>Department of Transport</p>	<p>Local Authorities should recognise the continued need to identify additional measures to deliver the level of ambition required. This includes, amongst others, the identification and implementation of further road space reallocation opportunities, pedestrian and cycling enhancement plans as well as various demand management measures, policies regarding transport climate action (both mitigation and adaptation) of relevance to the development of Local Authority climate action plans. These policies, as well as the CAP23 metrics for transport, should be reflected in Local Authority climate action plans as appropriate. Local Authorities should reference relevant supports that are being provided centrally in support of these objectives, and the specific actions proposed to deliver on these objectives.</p> <p>The importance and role of integrated land use and transport planning in meeting our climate commitments should be addressed in the LA Climate Action Plan.</p> <p>At local level the preparation of local transport plans, in consultation with the National Transport Authority and Transport Infrastructure Ireland, should set mode share targets in order to support a significant shift to active and sustainable modes and the reduction in private car trips in the short to medium-term.</p> <p>Those responsible for coordinating the preparation of the Climate Action Plan should ensure all related policy objectives</p>	<p><b>CE Response:</b></p> <p>The submission from the Department of Transport is welcomed and the contents noted.</p> <p>Carlow County Council continue to work towards decarbonising our fleet and facilitating a transition towards sustainable and low carbon transport modes through the promotion of alternative modes of transport and walkable communities.</p> <p>Carlow County Council acknowledges the fundamental link between transport and land use to reduce reliance on car-based travel and to ensure more sustainable patterns of travel, transportation and development. The need to consolidate and concentrate development in a manner that allows the effective provision of, and ready access to public transport is acknowledged in the Carlow County Development Plan 2022-2028 through the appropriate zoning of lands and implementation of development management standards that support appropriate densities and mixed-use developments. Prioritisation of integrated transport and land use, supported by investment in public transport, active travel networks and shared, low carbon mobility options will improve people's travel choices and support safe, sustainable and healthy lifestyles. It is the stated policy of the Council to actively support sustainable modes of transport through appropriate land use zonings and to encourage levels of development with mixed uses within walking distance of public transport nodes on well located accessible sites in town and village centres throughout the County.</p>

	<p>and National and Local EV Infrastructure targets are adequately reflected in the Climate Action Plans</p> <p>Local Authorities should therefore seek to ensure that their climate action plans are cognisant of and aligned with the The Clean Air Strategy (CAS) and the National Sustainable Mobility Policy (SMP), both in terms of the overall targets of the SMP as amended by CAP23 (and future iterations of the CAP), including the specific actions identified for completion by 2025, and with any recommendations that may emerge from the forthcoming National Demand Management Strategy</p> <p>When revising and updating adaptation plans and actions for the new LACAPs, Local Authorities should consider the following relating to Transport infrastructure adaptation</p> <ul style="list-style-type: none"> <li>• Alignment with national Climate Action Plan adaptation actions for Transport infrastructure, including the potential for continued cross-sectoral collaboration (e.g. through CAROs) to support knowledge transfer and capacity-building;</li> <li>• Consideration of the most recent approved statutory Transport Sectoral Adaptation Plan findings, recommendations and actions in the design, planning and investment of LA transport infrastructure.</li> </ul> <p>Those responsible for coordinating the preparation of the Climate Action Plan should ensure all related policy objectives and National and Local EV Infrastructure targets are adequately reflected in the Climate Action Plans</p>	<p>The Climate Action Plan will seek to support the integration of land use and transportation as outlined in the Carlow County Development Plan 2022-2028.</p> <p>T1.1 &amp; T1.2 Will reduce emissions from Carlow County Council Fleet</p> <p>T1.3 Commits Carlow County Council to develop and adopt an Electric Vehicle Strategy. This policy will be developed in partnership with Zero Emission Vehicles Ireland (ZEVI)</p> <p>T1.4 Copper-fastens Carlow County Councils commitment to deliver active travel projects across the County to encourage use of active travel modes such as walking or cycling.</p> <p>T1.5 Assures preparation of local transport plans, based on the Area Based Transport Assessment (ABTA) approach in consultation with NTA, TII, IE and relevant stakeholders for Carlow Town, Tullow and Muine Bheag</p> <p>Carlow County Council has 3 participants in the current The Smart and Sustainable Mobility Accelerator programme (SSMA)</p> <p>Carlow Town to SETU Pedestrian &amp; Cycle Scheme was one of the 35 Pathfinder projects selected by the Department of Transport Carlow County Council will continue working with Local Link to improve accessibility to Shared mobility schemes throughout the County.</p> <p><b>CE Recommendation</b></p> <p>No modification is proposed to the Draft Carlow County Council Local Authority Climate Action Plan 2024 – 2029 on the basis of this submission for the reasons set out above.</p>
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#### 4.6 Submissions CLW 6

Submission CLW 6	Submission Summary	CE Response and Recommendation
<p>County Carlow Environmental Network</p>	<p>“Above Average Precipitation” - sounds very innocuous, and there is no definition without having to refer to the RPS report, which does not seem to define the period of time of the average rainfall, e.g., days, weeks, months? Consider relabelling as “Prolonged period above average rainfall.</p> <p>Cold Spell seems to indicate a short period of extreme cold. Climate scientists are indicating that with a stall in the jet stream, weather patterns are expected to hang around for longer. Consider: “Prolonged period below average temperature” .</p> <p>Proactively educate and promote climate, biodiversity and eco-awareness to council staff and the wider community.</p> <p><i>Strategic Goal 1.</i> All projects/development must undertake a risk assessment as to the impact on climate, biodiversity etc and the risks be removed and mitigation measures designed and implemented</p> <p>Support opportunities to support waterways management (streams, wetlands, and</p>	<p><b>CE Response:</b> The submission from County Carlow Environmental Network is welcomed and contents acknowledged.</p> <p>Standardised scientific terminology used at all times throughout the plan.</p> <p>G 1.4 &amp; C1.1 provide for Climate Action engagement programme in the workplace for all staff, Elected Members and the wider community.</p> <p><i>Strategic Goal 1.</i> All Local Authority projects are subject to legislative compliance and statutory processes including AA Screening/Flood Risk assessment.</p> <p>Community projects are provided for in action C1.3 Carlow County Council will continue to work with the Local Authorities Water Programme ( LAWPRO), Waterways Ireland, National Parks and Wildlife ( NPWS) and other relevant stakeholders to facilitate waterway management and forestry restoration.</p> <p><i>Strategic Goal 2:</i> Potential light pollution has been mitigated for in the design of the Public Lighting Energy Efficiency project (PLEEP).</p> <p>Building on flood plains is addressed in Carlow County Development plan 2022-2028</p>

	<p>rivers), creation and maintenance of riparian zones, ways of slowing water and creating flood zones for times of high water to aid the prevention of flooding downstream and improving habitats for wildlife while achieving climate targets through the implementation of the climate actions within the plan.</p> <p>Support opportunities to support forestry restoration, rehabilitation and maintenance while achieving climate targets through the implementation of the climate actions within the plan.</p> <p>Support opportunities to support upland area restoration (Blackstairs Mts), rehabilitation and maintenance and prevention of uncontrolled fires while achieving climate targets through the implementation of the climate actions within the plan.</p> <p><i>Strategic Goal 2:</i> B1.4 ...are maintained or reduced/controlled to avoid effects to biodiversity and light Pollution</p> <p>B1.11 &amp; B1.12 These items need to actively include ways of slowing water, creating wetlands and creating areas for rivers to flood to prevent flooding downstream.</p>	<p>Actions B1.11 &amp; B1.12 address updating of the Major Emergency Plan &amp; Flood Plan and Carlow County Council guidelines for nature based sustainable drainage solutions.</p> <p>Renewable energy and reduction in energy demand is addressed in Action B1.2 Prepare and implement a carbon savings programme of measures for Council buildings/facilities to assist in achieving a 51% reduction in greenhouse gas emissions by 2030.</p> <p><i>Transport:</i> T1.1 to include all mechanically propelled vehicles.</p> <p>T1.5 Local Link provide this service.</p> <p>Railway services are outside the remit of Carlow County Council.</p> <p>Connectivity between transport services underway with e Bike Scheme.</p> <p>Park and ride facility currently under investigation with TII.</p> <p><i>Strategic Goal 3:</i> NE1.3 Will be implemented on lands where Local Authority has remit.</p> <p>NE1.4 Implementation included in Action.</p> <p>NE1.5 Inclusion of Biodiversity is standard. Hedge cutting is not under remit of LA for enforcement. Document is for internal LA use.</p> <p>Hedgecutting and verge strategy are included in the Carlow County Council Biodiversity Action plan.</p>
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	<p>Renewable energy on all County Council buildings and lands where appropriate and use of smart metres and energy management to optimise energy efficiency and time of use (non-peak).</p> <p><i>Transport:</i>  T1.1 ... to include all motorised machinery., e.g. road sweepers  T1.5 Investigate travel solutions for people living in rural areas.</p> <p>Promote increase in railway services (more trains) and upgrade of rail line (two track). Evening train back from Dublin badly needed.</p> <p>Promote connectivity between rail to bus, bus to bus etc.</p> <p>Having encouraged people to move to Carlow because it's commutable (Carlow LEO), develop Park and Ride options to major areas, e.g., Bus stop to airport, Carlow town to Leixlip, Maynooth etc. (Carlow LEO have completed surveys to see how many people commute in and out of the County.)</p> <p><i>Strategic Goal 3:</i>  NE1.3 Prepare and implement  NE1.4 ... and enforce said policy  NE1.5 Prepare a Hedge and Road Verge Maintenance Strategy for Carlow County Council, having due regard to hedgerow conservation requirements and for biodiversity</p>	<p>Environmental Issues can be reported through existing mechanism. Local Authority can only action reports that come under their remit. Complaints pertaining to issues that are outside the remit of the local authority are communicated to the relevant organisation.</p> <p>STRATEGIC GOAL 4:  Carlow County Council have identified supported events that will achieve maximum effect.</p> <p>Guidelines to be completed, approved and circulated.</p> <p>Community gardens policy currently being developed and point of contact will be established.</p> <p>Arts and Culture projects being progressed by Arts Department.</p> <p>STRATEGIC GOAL 5:  Two Large scale composting facilities operate in Co. Carlow.</p> <p>Wate collection is facilitated by the private sector. Once off events under anti-dumping initiative will continue when funding allows for same.</p> <p>'Repair cafes' not possible at present due to insurance issues. Ongoing exploration of same through the Regional Waste management Offices.</p> <p>Single use plastic policy in place in Carlow County Council.</p>
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	<p>Hedgecutting and verge strategy to include an annual cutting plan which is mindful of biodiversity and flowering times</p> <p>Support opportunities to support waterways management (streams, wetlands, and rivers), creation and maintenance of riparian zones, ways of slowing water and creating flood zones for times of high water to aid the prevention of flooding downstream and improving habitats for wildlife while achieving climate targets through the implementation of the climate actions within the plan.</p> <p>Support opportunities to support forestry restoration, rehabilitation and maintenance while achieving climate targets through the implementation of the climate actions within the plan.</p> <p>Support opportunities to support upland area restoration (Blackstairs Mts), rehabilitation and maintenance and prevention of uncontrolled fires while achieving climate targets through the implementation of the climate actions within the plan.</p> <p>Encourage and develop a mechanism for reporting of environmental issues (hedges, tree felling, Fires etc)</p>	<p>Ban on Coffee cups is outside the remit of Carlow County Council. Killarney project is a community led initiative involving Independent coffee shops and hotels signing on to the Killarney Coffee Cup Project.</p> <p>The Department of Agriculture, Food and the Marine have produced the Food Vision 2030. The Strategy aims for an integrated food systems approach to food and health policy.</p> <p><b>CE Recommendation</b> No modification is proposed to the Draft Carlow County Council Local Authority Climate Action Plan 2024 – 2029 on the basis of this submission for the reasons set out above.</p>
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	<p><i>STRATEGIC GOAL 4:</i></p> <p>C1.5 Develop a Green Festivals &amp; Events Strategy to include all events from small to large, funded by the County Council, ensuring these are carried out in accordance with sustainability guidelines</p> <p>C1.6 Guidelines have been created for the URBACT project by Carlow LEO.</p> <p>C1.7 Develop, adopt and implement a community Garden &amp; Allotment Policy for Carlow County Council, and identify land for same.</p> <p>Consider providing a point of contact to assist the county community garden and allotment network</p> <p>Promote values based learning and conversations through Arts and Culture in communities to foster resilience and transition mitigation and adaptation. The values behind the SDGs</p> <p><i>STRATEGIC GOAL 5:</i></p> <p>Develop a pilot large scale community composting facility (Powerstown?)</p> <p>Investigate logistics of an Annual Waste Collection initiative around the County for mattresses, sofas, white goods etc., to facilitate people without transport</p>	
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	<p>Support and foster “repair cafes and shops” - LEO</p> <p>Ban single use coffee cups (like Kilarney)</p> <p>Promote and use ethically produced goods (supply chain) and food (local, organic, free range, fairtrade etc)</p> <p>Develop a network of local food producers, enabling people to access local food and produce., e.g, not just having the farmers market as producers only, helping food producers to access alternative distribution methods.</p>	
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#### 4.7 Submissions CLW 7

Submission CLW 7	Submission Summary	CE Response and Recommendation
<p>Brendan Ward</p>	<p>Set the charges for the use of public car parks.                      Consideration should be given to introducing, on a phased basis, additional charges for fossil fuel vehicles in order to incentivise the use of electric vehicles.</p> <p>NE1.5 in the Plan refers to the preparation of a Hedge and Road Verge Maintenance Strategy. This again is an area where the Council has a direct responsibility and consequently any actions taken can have a more immediate impact. At present local authorities write to landowners are on a regular basis to remind them of their duty to cut roadside hedges. However if hedges are cut on an annual basis it results in a release of carbon. They only sequester carbon if they are managed sensitively and need only be cut every three years.</p> <p>2018 GHG emissions from Agriculture in county Carlow were 38.9%. This is even in excess of the national average according to the most recent figures from the EPA. More recent information would be needed but it seems reasonable to conclude that this is primarily caused by methane emissions from livestock farming. On these figures it will be impossible to reach the overall target of 51% without having substantial reductions from the agricultural sector yet there are no actions outlined in the Plan of how we might even begin to achieve this. This is particularly disappointing when the document states in the introduction that Carlow County Council is "pursuing a leadership role on climate action at the local level</p>	<p><b>CE Response:</b>                      The submission from Brendan Ward is welcomed and contents are acknowledged.</p> <p>Carlow County Council operate paid parking within Carlow Town only. The administration of same are governed by the The Municipal District of Carlow Carlow County Council parking Bye – Laws. There are no provisions at present to introduce different charges by vehicle type.</p> <p>The Roads Act 1993 (Section 70) places a statutory obligation on all landowners/occupiers of land or structures to ensure that roadside structures, trees, shrubs or other vegetation do not present a danger to those using and working on public roads. Carlow County Council issue public notices twice per year highlighting landowner legal obligations with regards to hedge cutting and road safety, biodiversity and invasive species are also highlighted in these notices. Targeted notices are sent to individual land owners where unmanaged hedges present a road safety issue only.</p> <p>The Government Climate Action Plan 2023 ( CAP23) sets out the ambitious sectoral plan and pathways for achieving our National Climate targets. Central Government is working with all relevant Government Departments to achieve ambition of halving Ireland's greenhouse gas emissions by the end of the decade, and putting Ireland on course to becoming carbon neutral by 2050. Carlow County Council are mandated to achieve 51% reductions of its GHGs including its buildings, public lighting and</p>

		<p>council fleet. The Department of Agriculture are mandated to achieve targets pertinent to their area.</p> <p><b>CE Recommendation</b>                  No modification is proposed to the Draft Carlow County Council Local Authority Climate Action Plan 2024 – 2029 on the basis of this submission for the reasons set out above.</p>
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#### 4.8 Submissions CLW 8

Submission CLW 8	Submission Summary	CE Response and Recommendation
Rosemary Rooney	Submissions raised the issue of Strategic Goal 3. Natural Environment & Green Infrastructure: Nature Restoration Programme of the Blackstairs.	<p><b>CE Response:</b>                  The submission from Rosemary Rooney is welcomed and contents acknowledged.</p> <p>While Carlow County Council acknowledge the significance of the upland ecosystems, a nature restoration programme of the Blackstairs requires a collaborative commitment from a variety of Government departments and therefore is outside of the remit of Carlow County Council Climate Action Plan.</p> <p>Support for this endeavour is provided for in Carlow County Council Biodiversity Action Plan.</p> <p><b>CE Recommendation</b>                  No modification is proposed to the Draft Carlow County Council Local Authority Climate Action Plan 2024 – 2029 on the basis of this submission for the reasons set out above.</p>

#### 4.9 Submissions CLW 9

Submission CLW 9	Submission Summary	CE Response and Recommendation
<p>EPA</p>	<p>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>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.</p> <p>The Plan should include a commitment to remain aligned with high level plans and programmes, Guidelines, and legislation over its lifetime. The Climate Action Plan 2024 is currently being prepared and work will be commencing on the review of the National Planning Framework and Regional Spatial and Economic Strategies also. Any relevant updates of these plans/strategies should be integrated as appropriate into the Plan as relevant and appropriate.</p> <p>The Plan should include a commitment to consider any relevant updated actions, measures or recommendations that may arise in updates to the National Climate Action Plan (or the National Planning Framework) over the lifetime of the Plan.</p> <p>Our State of Environment Report, Ireland's Environment - An Integrated Assessment 2020 (SOER2020) identifies thirteen 'Key Messages for Ireland'. Delivering Ireland's long-term sustainable development and environmental objectives will</p>	<p><b>CE Response:</b>                      Submission from the EPA is welcomed and contents acknowledged.</p> <p>Implementation monitoring will be conducted locally through our Climate Action and Management Teams and reported annually to Council. Implementation monitoring both Regionally and Nationally will be conducted through the CARO.</p> <p>Findings of the SEA ER and NIS are fully reflected in the Plan which has undergone review process with consultants.</p> <p>Carlow County Council in preparing and implementing this draft climate action plan has considered best practice, adherence to national climate policy, compliance with the provisions of relevant statutory instruments, inclusive engagement and consultation with relevant stakeholders and alignment with the local government sectoral requirements and commitments on climate action.</p> <p>Carlow County Council will comply with relevant updates to the national Climate Action Plan and National Planning Framework as amended over the lifetime of the Plan in accordance with it's statutory obligations.</p> <p>The recommendations in the SOER 2024 report, once published, will be considered by Carlow County Council in accordance with it's statutory obligations.</p>

	<p>involve many different stakeholders to address these key actions. The report recognises the need for full implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies.</p> <p>The EPA are currently preparing the next iteration of the SOER report, which will be published in 2024. We recommend that a commitment is made in the Plan, to take account of any relevant recommendations in the SOER 2024 report, once published, in implementing the Plan over its lifetime.</p>	<p><b>CE Recommendation</b></p> <p>No modification is proposed to the Draft Carlow County Council Local Authority Climate Action Plan 2024 – 2029 on the basis of this submission for the reasons set out above.</p>
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#### 4.10 Submissions CLW 10

Submission CLW 10	Submission Summary	CE Response and Recommendation
Steadfast Creation	<p>Steadfast Creation outline their vision to create a healthy environment, Sustainable community, empowered community, social inclusion, creativity, recreation and self-sufficient.</p> <p>Steadfast Creation detailed a number of projects that they are involved in and their ethos with regards to lessons that can be learned from gardening.</p>	<p><b>CE Response:</b></p> <p>The submission from Stedfast Creation is welcomed and the contents are noted. The submission is positive in its outline of the power of gardening but makes no recommendations for modification of the plan.</p> <p><b>CE Recommendation</b></p> <p>No modification is proposed to the Draft Carlow County Council Local Authority Climate Action Plan 2024 – 2029 on the basis of this submission for the reasons set out above.</p>

#### 4.11 Submissions CLW 11

Submission CLW 10	Submission Summary	CE Response and Recommendation
<p>Uisce Eireann</p>	<p>Uisce Eireann welcomed the publication of the vision for Carlow County Council Climate Action Plan 2024-2029 and noted UE was developing it's own sustainability plans and were supportive of CCC proposals to protect and enhance Carlow's green and blue spaces.</p> <p>UE welcomed the action to "Prepare Carlow County Council guidelines for nature based sustainable drainage solutions, ensuring the guidelines have appropriate regard to environmental protection requirements, including requirements to protect European sites." UE noted that they would welcome in particular consideration of by CCC of a number of documents when preparing their guidelines.</p> <p>UE noted proposals under the recast Urban Wastewater Treatment Directive (UWWTD) including preparation of Integrated Urban Wastewater Management Plans (IUWWMP's) for certain thresholds. Noting, if adopted the new UWWTD will require collaboration between UE and LA's on integrated drainage planning.</p> <p>UE cited their National Water Resource Plan and their implantation of a Climate Risk and Resilience Assessment project on all their new and existing assets.</p> <p>UE noted future projections that Carlow will experience increased periods of drought. UE request that water demand management (by households, businesses &amp; schools etc) be considered in the climate action plan.</p>	<p><b>CE Response:</b></p> <p>The submission from Uisce Eireann is welcomed and contents acknowledged.</p> <p>The many projects and initiatives of UE towards sustainability, energy efficiency, climate resilience, and the circular economy are noted.</p> <p>Carlow County Council will be cognisant of all relevant guidelines, best practice and standards in the preparation of it's guidelines for nature based sustainable drainage solutions for Carlow County Council.</p> <p>Carlow County Council acknowledges progress on the recast Urban Wastewater Treatment Directive (UWWTD) and will address its obligations under the legislation once the UWWTD is signed.</p> <p>Water demand management (by households, businesses &amp; schools) is outside the remit of the Local Authority. Carlow County Council will continue to monitor and improve its own water demand across it's buildings and services. Projects such as rainwater harvesting as implemented at Carlow Fire Station, the increased use of planting that is drought tolerant will continue to be implemented by Carlow County Council.</p>

	<p>UE would welcome consideration of water use efficiency as a measure/action in the Plan.</p> <p>UE noted their efforts and projects to improve their energy efficiency, circularity and bioeconomy.</p> <p>UE welcomes Carlow County Councils Objective “to Support the development and implementation of positive climate action across all operations of Carlow County Council, collaborating with others to lead, influence and assist in their endeavours to reduce their negative climate impact.” Uisce Eireann are eager to collaborate with others in leveraging circularity opportunities to support the development of a sustainable bioeconomy mode.</p>	<p><b>CE Recommendation</b></p> <p>No modification is proposed to the Draft Carlow County Council Local Authority Climate Action Plan 2024 – 2029 on the basis of this submission for the reasons set out above.</p>
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#### 4.12 Submissions CLW 12

Submission CLW 12	Submission Summary	CE Response and Recommendation
<p>Dept. of Agriculture Food &amp; the Marine</p>	<p>Local authorities should include relevant steps to support a Just Transition for the sea fisheries and aquaculture sectors in their Climate Action Plans.</p>	<p><b>CE Response:</b></p> <p>The submission from the Department of Agriculture Food and the Marine in relation to Irelands Seafood Industry is welcome and contents acknowledged.</p> <p>Carlow is a non-coastal county. Carlow County Council will continue to work with partners and other organisations to protect waters within the administrative area of Carlow County Council. Waters includes rivers, streams, ponds, groundwater and bathing waters.</p> <p><b>CE Recommendation</b></p> <p>No modification is proposed to the Draft Carlow County Council Local Authority Climate Action Plan 2024 – 2029 on the basis of this submission for the reasons set out above.</p>



### 4.13 Submissions CLW 13

Submission CLW 13	Submission Summary	CE Response and Recommendation
<p>Not Here Not Anywhere</p>	<p>Not Here Not Anywhere (NHNA) made a submission with arguments and research in support of their recommendations under 3 different headings, namely</p> <ol style="list-style-type: none"> <li>1. Fossil Fuels and fossil fuel infrastructure</li> <li>2. Energy</li> <li>3. Data Centres</li> </ol> <p><u>1. Fossil fuels and fossil fuel infrastructure</u></p> <p>The Climate Action Plan should ensure a rapid phasing out of all fossil fuels including gas.</p> <p>The Climate Action Plan should include a planned phasing out of existing connections to the gas grid.</p> <p>The Climate Action Plan should ban fracked gas in its energy mix.</p> <p>The Climate Action Plan should rule out any new fossil fuel infrastructure projects.</p> <p><u>2. Energy - A better way forward</u></p> <p>The Climate Action Plan should add 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.</p> <p>The Climate Action Plan should safeguard against Energy Poverty</p> <p>The Climate Action Plan should contain measures to ensure that energy demand is managed responsibly and sustainably,</p>	<p><b>CE Response:</b></p> <p>Carlow County Council welcomes the submission of Not Here Anywhere and acknowledges contents.</p> <p>The Actions in the Climate Action plan under the theme of “Built Environment &amp; Transport” support the recommendations of NHNA with regards to fossil fuels and energy use, in particular actions B1.1, B1.2, B1.3 and B1.6 and B1.7. The action plan includes measures to ensure that energy demand across local authority services is managed responsibly and sustainably including actions to measure and reduce energy across local authority buildings B1.1, B1.2, B1.3 and B1.6 and B1.7; public lighting B1.4 and B1.5; and fleet T.1 and T1.2.</p> <p>Actions to support communities are outlined under the theme of “Communities: Resilience &amp; Transition. Actions C1.1, C1.2 and C1.3 will incentivise communities to carry out energy projects. Actions B1.6 and B1.7 will help safeguard against fuel poverty.</p> <p>Recommendations by NHNA specific to data centres are governed by development control through the planning process and also by utility providers and are deemed outside the scope of this Climate Action Plan.</p> <p><b>CE Recommendation</b></p> <p>No modification is proposed to the Draft Carlow County Council Local Authority Climate Action Plan 2024 – 2029 on the basis of this submission for the reasons set out above.</p>

	<p>with energy seen as a public good whereby essential services are prioritised. This should involve rapid retrofitting and the decarbonisation and increase of accessibility of public transport.</p> <p>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 marginalised groups in participatory processes. Those running participatory processes should keep a detailed record of the participation of marginalised groups and of best practices that serve to increase this participation.</p> <p><u>3. Data Centres</u></p> <p>The Climate Action Plan should add as an action the setting an overall cap on the level of data centre energy demand that can be accommodated by the electricity grid in Carlow.</p> <p>The Climate Action Plan should specify that new and existing data centres are required to provide flexibility to the grid at times of day and times of year when wind and solar energy on the grid is low relative to demand - and not allowing data centres to use fossil fuel generation as the means of providing this flexibility (they can use other means e.g. energy storage, time-shifting of data processing services).</p> <p>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:</p> <ul style="list-style-type: none"> <li>○ On site direct renewable power source generation combined with energy storage, or o</li> </ul>	
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	<p>Off site renewable power source and energy storage with dedicated grid connection (avoiding Renewable Energy Certificates).</p> <ul style="list-style-type: none"> <li>○ Any renewable energy infrastructure must comply with best practice public participation.</li> </ul> <p>New data centres should have infrastructure in place to enable heat generated from them to be utilised for district heating systems.</p>	
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### 5.5 Summary of Chief Executive's recommendations for Proposed Modifications

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

Draft CAP Section and Page	Proposed Modifications	SEA & AA Assessments
Carlow Town DZ page 69	Listing of specific register of opportunities for DZ	N/A
	Inclusion of updated graphics and images throughout the LACAP	N/A
	Inclusion of illustration mapping SDGS to thematic Goals	N/A

## 5 Conclusions

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

The Elected Members have up to 6 weeks to consider this Chief Executive's Report, in accordance with the requirements of the Climate (Amendment) Act 2021. Elected Members will be briefed on the 8th January 2024 to provide an overview of the Chief Executive's Report and in January 2024 Council Meeting of Carlow 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 Carlow County Council Draft Climate Action Plan 2024-2029, this Chief Executive's Report on Draft Plan Public Consultation, Strategic Environmental Assessment and Appropriate Assessment Screening of Chief Executive's Recommendations, it is proposed that the Draft Climate Action Plan be approved by the Elected Members, in accordance with the recommendations of this report.

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

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

Recommended by:

\_\_\_\_\_  
Jannette O' Brien  
Climate Action Co-Ordinator

\_\_\_\_\_  
Orla Barrett  
Senior Engineer, Environment

Approved by:



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Padraig O'Gorman  
Director of Services

\_\_\_\_\_  
Coilín O'Reilly  
Chief Executive

**Appendix 1: List of Persons, Organisations and Bodies who made Submissions**

Reference Number	Author	Type
CLW-C67-1	Elizabeth Bradley	Individual
CLW-C67-2	Gas Networks Ireland	Utility
CLW-C67-3	Mary Ryan	Individual
CLW-C67-4	Community Gardens Ireland	Organisation
CLW 5	Department of Transport	Gov. Body
CLW - 6	County carlow Environmental Network	Organisation
CLW -7	Brendan Ward	Individual
CLW -8	Rosemary Rooney	Individual
CLW - 9	EPA	Gov. Body
CLW -10	Steadfast Creation	Industry
CLW - 11	Uisce Eireann	Utility
CLW - 12	Dept. of Agriculture Food & the Marine	Gov. Body
CLW - 13	Not Here Not Anywhere	Organisation

**Appendix 2: Public Notice of Draft Plan Public Consultation**

**DRAFT LOCAL AUTHORITY CLIMATE ACTION PLAN 2024 – 2029**  
**SECTION 5 OF THE CLIMATE ACTION AND LOW CARBON DEVELOPMENT (AMENDMENT) ACT 2021**

Carlow County Council has made a Draft Local Authority Climate Action Plan (LACAP) for the period 2024 – 2029. The Draft LACAP sets out how the local authority can promote a range of mitigation, adaptation and other climate action measures, to help deliver the Government’s National Climate Objective to achieve, by no later than the end of 2050, a transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy.

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

A copy of the Draft LACAP and associated documents is available to view online at <https://consult.carlow.ie/en/browse>

The Draft LACAP may be inspected during public opening hours from **Wednesday 13th September 2023 until Wednesday 25th October 2023** inclusive, at the following locations:

- County Buildings, Athy Road Carlow, R93 E7R7
- Tullow Civic Offices, Link Road, Tullow, R93 WP86
- Bagenalstown Civic Offices, McGrath Hall, Bagenalstown, R21 WR66

At the following Public Libraries during normal opening hours:

- Carlow Central Library, Tullow Street, Carlow , R93 K126
- Tullow Library ,Civic Offices, Tullow R93 WP86
- Bagenalstown Library, Main Street, Bagenalstown R21 X592
- Borris Library, Lower Main Street, Borris R95 HF25

**Making a Submission or Observation**  
 Written submissions or observations regarding the Draft LACAP, SEA Environmental Report and AA Natura Impact Report, are invited from members of the public and other interested parties. Submissions or observations may be made in one of three ways:

- Online via the Councils Public Consultation Portal at <https://consult.carlow.ie/en/browse>
- Via Email with "Draft Local Authority Climate Action Plan" in the subject line to [climate@carlowcoco.ie](mailto:climate@carlowcoco.ie)
- In writing (marked "Draft Local Authority Climate Action Plan") to:

Climate Action Co-ordinator, Environment and Climate Action Department, Carlow County Council, The Assembly Rooms, 40 Dublin Street, Carlow R93 X3T5

Submissions or observations must be made in writing no later than **4.00 p.m. on Wednesday 25th October 2023**. Late submissions will not be accepted.

Please consider the following in making your submission:

- Submissions should be made using ONE method only i.e. online or in hard copy.
- Submissions or observations should include your name and address and, where relevant, details of any organisation, community group or company etc. you represent.
- Written submissions or observations with respect to the Draft LACAP, made within the period stated, will be taken into consideration before the making of the LACAP.
- Please ensure that no vexatious, libelous or confidential information, including confidential information relating to a third party (in respect of which the third party has not, expressly, or impliedly in the circumstances, consented to its disclosure) is included.
- All submissions/observations will be subject to the Data Protection Act 1988-2018 and the Freedom of Information Act 2014.

**Public Information Drop-In Events**  
 Council staff will be available during the hours 5.00pm -7.00pm to provide guidance on the Draft LACAP and on the consultation process, you are welcome to come along to:

Location	Date	Time
Bagenalstown Library	Tuesday 19 <sup>th</sup> September	5-7pm
Tullow Library	Wednesday 20 <sup>th</sup> September	5-7pm
Carlow Central Library	Thursday 21 <sup>st</sup> September	5-7pm

If you require more details, please contact the Environment and Climate Action Section at 059-9136231 or email: [climate@carlowcoco.ie](mailto:climate@carlowcoco.ie)

Signed: **Padraig O Gorman**  
 Director of Services Transportation, Environment, Water Services, Building Control & Emergency Services.

Date: 11/09/2023

**Carlow County Council Offices, Athy Road, Carlow**  
[www.carlow.ie](http://www.carlow.ie)

**Appendix 3: SEA Screening Conclusion and Determination and AA Screening Conclusion and Determination**

**SEA Screening Conclusion and Determination**

**AA Screening Conclusion and Determination**