# Chief Executive's Report on Submissions Received to the Waterford City and County Council Draft Climate Action Plan 2024-2029



January 2024

**Environment Department** 

**Waterford City and County Council** 



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### 1 Introduction

### 1.1 Purpose of the Report

Waterford City and 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 **Waterford City and County Council** Draft Climate Action Plan 2024-2029, was given on November 3rd, 2023. Submissions or observations with regard to the Draft Plan and Environmental Reports (Strategic Environmental Assessment and Appropriate Assessment) were invited for a period of just over 6 weeks, from November 1st 2023 to December 15<sup>th</sup> 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 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 been issued this Chief Executive's Report within 6 weeks of the consultation closing, in accordance with the requirements of the Climate (Amendment) Act 2021. Elected Members will be briefed at a meeting in the first week of February to provide an overview of the Chief Executive's Report and in February 2024 Council Meeting of Waterford City and 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)

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.

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

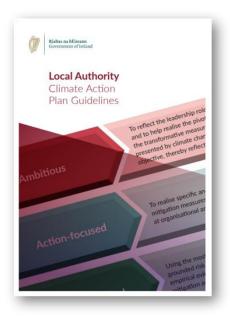
The Climate (Amendment) Act 2021 specifically requires all local authorities in Ireland to prepare and approve a Climate Action Plan, in consideration of wider national climate and energy targets, addressing both mitigation and adaptation measures. This is aligned to the Government's overall National 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.

Waterford City and County Council's Draft Climate Action Plan sets a clear pathway for Waterford City and 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 Waterford City and 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, 1st, November 2023 to Friday, 15th, December 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

Waterford City & County Council conducted 1 non-statutory pre-draft consultation 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 – Preparation of the Draft (non-statutory)

In order to ensure that local-based information and opinions were considered and included, Waterford City & 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 Waterford City & County Council's Consult portal, Consult.ie.

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

Submissions were accepted from the 8<sup>th</sup> May 2023 – 23<sup>rd</sup> June 2023.

There were 19 online submissions received.

During the pre-draft public consultation period, a number of Public Information Events took place.

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.

Presentations were 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 Waterford City & 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 Waterford City & County Council

Members of the Environment, Biodiversity and Climate Action SPC were advised and updated on their meeting of 9<sup>th</sup> May 2023.

Table 1: Predraft consultation events

Pre-Draft Consultation Dates		
Date	Event	
09/05/23	Presented to Environment, Biodiversity and	
	Climate Action SPC	
01/06/23	Ardkeane Library – Public Climate Action	
	Workshop	
01/06/23	Plenary Workshop to Council on Climate	
	Action	
02/06/23	Central Library – Public Climate Action	
	Workshop	
07/06/23	Radio interview on Climate Action, Déise	
	Today	
08/06/23	PPN event on Climate Action (attendance	
	40)	
09/06/23	Dungarvan Library – Public Climate Action	
	Workshop	

# 2.3 Public Information Events

# **Engagement with Key Stakeholders and Young People**

The following is a table summary of the list of key stakeholders engaged with over the course of the Draft Climate Action Plan's development:

Table 2: Stakeholders Engaged With

Stakeholder Name	Stakeholder Type
Department of the Environment, Climate and	Gvt. Dept.
Communications	
Department of Transport	Gvt. Dept.
Department of Rural and Community	Gvt. Dept.
Development	
Department of Housing	Gvt. Dept.
Department of Agriculture, Food and the	Gvt. Dept.
Marine	
Department of Enterprise, Trade and	Gvt. Dept.
Employment	
National Parks and Wildlife Services	Exec, Agency
National Transport Authority	Gvt. Agency
Transport Infrastructure Ireland	Gvt. Agency
Sustainable Energy Authority of Ireland	National Authority
Office of Public Works	Gvt. Agency
Local Government Managment Agency	Gvt. Agency
Geological Survey of Ireland	Gvt. Agency
Environmental Protection Agency	Public Body
Met Éireann	National Authority
Southern Regional Assembly	Regional Assembly
Climate Action Regional Offices	Regional
	Authorities
Local Enterprise Office	Local
The Heritage Council	National Council
Local Authority Waters Programme	Local Authority
Accelerating Change Together	Social Enterprise
An Taisce	Trust
Birdwatch Ireland	Voluntary

Climate Change Advisory Council	Advisory
Coastwatch	NGO
ESB	Energy Supplier
Gas Networks Ireland	Energy Supplier
Industrial Development Authority	Gvt. Agency
Cork/Kilkenny/Tipperary County Councils	Local Authority
The Marine Institute	Gvt. Agency
Fáilte Ireland	Gvt. Agency
Waterford Secondary Schools (through the	Members of public
Student Climate Conference)	
Youth Advisory Climate Council	Voluntary Group

Methodology used by Waterford City & County Council for consultation with key stakeholders:

- Local Newspaper Notice: Munster Express & Dungarvan Observer
- Local Radio Advertisement WLR
- Social media advertisement
- Local Authority Website
- Waterford PPN
- Communications with Statutory Stakeholders
- Public Display in City/County Buildings of WCCC
- Public Display in Library Branches
- Presentation to Staff members of WCCC
- Presentation to Elected members of WCCC
- Presentation to Members of Environment, Biodiversity and Climate Action SPC
- 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 Wednesday 1<sup>st</sup> November 2023, with submissions invited until 6pm Friday 15<sup>th</sup> December.

In order to ensure that local-based information and opinions were considered and included, Waterford City & 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 Waterford City & County Council's Consult portal, Consult.ie.

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

Presentations were 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 Waterford City & 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 Waterford City & County Council

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

Table 3: Draft Consultation Dates

Draft Consultation Dates		
Date	Event	
11/09/23	Presentation on CAP at Dungarvan/Lismore	
	District Meeting	
20/09/23	Presentation on CAP at Comeragh District	
	Meeting	
10/10/23	Presentation on CAP at Special Extra	
	Meeting of the Environment, Biodiversity	
	and Climate Action SPC group. Vote taken to	
	send CAP to full Council	
12/10/23	Full Council meeting, vote taken on CAP	
	draft	
18/10/23	Presentation on CAP at Metropolitan	
	Meeting	

### 2.4 Public Information Events

In addition to the public events held, 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 were available on site including:

- WCCC County Development Plan 2022 2028
- Waterford Metropolitan Area Transport Strategy

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

Table 4: Climate Action Plan Workshop Dates

CAP Workshop Dates		
Date	Workshop Location	Attendees
06/11/23	Waterford GAA Health & Wellbeing	15
	Conference	
14/11/23	Ardkeen Library	4
15/11/23	PPN workshop	25
08/11/23	Student Climate Conference	32
16/11/23	Lismore/Dungarvan	2
20/11/23	Coolnasmear Parish Hall	9
24/11/23	Portlaw Libary	8
27/11/23	Dunhill	30
28/11/23	Butler Community Centre	6
29/11/23	Carrickpherish library	1
04/12/23	Ballybeg	5
05/12/23	Dungarvan	20
07/12/23	Youth Advisory Climate Council	5
09/12/23	Lismore	18
13/12/23	Cappoquin Community Centre 3	
06/12/23	Central Library	24



Figure 1. The Student Climate Conference, City Hall



Figure 2. Public engagement at Dungarvan Cinema

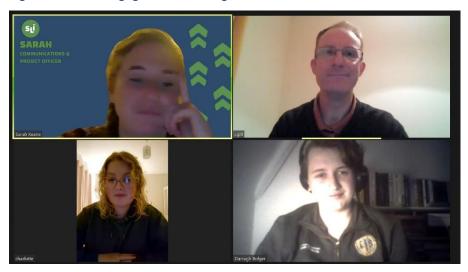


Figure 3. Meeting with the Youth Climate Advisory Council

### 3 Details of the Submissions

### 3.1 Introduction

A total of 28 valid submissions and observations were received, the breakdown of which is as follows:

Table 5 Submission types

Submission Type	Number
Online Portal Submissions	20
Posted / Handed Submissions	1
Email Submissions	7
Total Submissions	28

All valid submissions and observations were read, analysed and summarised. An overview of issues raised is provided in Section 3.3. The categorisation and summary of issues raised,

together with the Chief Executive's (CE) response and recommendations, is contained in Section 4.

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

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

Appendix A lists the persons, organisations and bodies that made written submissions. Each submission has been assigned an independent reference.

### 3.3 Summary of Issues Raised in Submissions

There were 28 valid submissions and observations received for the **Waterford City and County Council** Draft Climate Action Plan; these were read, analysed and summarised. Full summaries of all of the issues raised in the submissions and observations are set out in Section 4, together with the responses and recommendations of the Chief Executive. Issues have been summarised under the relevant chapter below.

Table 6: Summary of recommended amendments and locations

Chapter	Main Issue Raised	Recommended Ammendments
1.Overview	The need for a glossary	Glossary to be included
2.Profile of County	None	None
Waterford		
3.Evidence based Climate	Request to add in more recent	None – dates examined have been
Action	weather events	set by the Climate Action Plan
		guidance
4.Framework for Climate	Minor modifications to actions	11 actions to be modified
Actions	<ul> <li>clarifications requested and</li> </ul>	
	additions to actions. Many of	
	the issues raised were out of	
	the scope of the Climate Action	
	plan and came under the	
	County Development Plan	
5.Decarbonising Zone	None	None
6.Implementation and	Details requested on how	None – detail is contained in Chapter
reporting	updates will be made to the	6
	public.	

### 3.4 Chief Executive's Responses and Recommendations

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

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

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

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

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

Among the issues specifically not addressed, commented on or responded to in this report, include matters relating to planning applications, development sites or specific local authority projects undertaken. Such matters are best addressed under the various planning processes including development management, forward planning etc. Matters that are considered helpful to frame future policy will be considered, where such considerations do not undermine the integrity of the functions and processes stated above.

### 3.5 Structure of Proposed Modifications to the Plan

Amendments to the text of the Draft Climate Action 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 Climate Action Plan are shown in **green text**, for example:

Create regular Climate Communications to keep the public up to date on how they can contribute to Climate Action in Waterford

Deletions to the text of the Draft Climate Action Plan would shown in red text with strikethrough. There are no deletions required, only additions and changes to text.

# 4 Categorisation, Summary and Responses to Issues Raised

All 28 valid submissions and observations were read, analysed and summarised. The report takes the following format to address issues raised in the submissions and observations received.

### **4.1 Submissions from Prescribed Environmental Authorities**

Submission WFD-C25- CAP-2	Submission Summary	CE Response and Recommendation
ЕРА	Ensure that the Plan aligns with national commitments and recommendations on climate change mitigation and adaptation, water quality and air quality, including the forthcoming State Of The Environment 2024 report (SOER 2024) as well as any relevant sectoral or	CE Response: The submission from the EPA is welcomed and contents are acknowledged. This suggestion is in line with the goals of the Climate Action Plan.  The Climate Action Plan is being prepared in consideration with best practise, adherence to national policy on climate, transport, environment water and air
	regional adaptation plans and adjacent local authority climate action plans	quality, 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.
	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	Waterford's County Development Plan has considered the need for appropriate zoning and development of lands to avoid flooding.
	Vulnerable populations should be considered in the context of just transition/adaptation.	WCCC 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 its statutory obligations. The recommendations of the SOER 2024 report, once published, will be considered by WCCC in accordance with its statutory
	With regards flooding, the Plan should consider the need for appropriate zoning and development of lands to avoid incompatible land uses in areas at risk of significant flooding.	obligations.  Just Transition for Communities is one of the strategic goals for the Climate Action Plan. Climate Action 4.25 refers to backing LECP business actions that support



The Plan should align with the transport commitments	businesses transitioning to the green economy. WCCC will continue to work with
in the National Planning Framework and the Southern	partners and other organisations to support just transition.
Regional Spatial and Economic Strategy, where	
appropriate and relevant	Action 3.5 under Natural Environment refers to delivery of Catchment Flood Risk Assessment and Management plan, and Action 2.34 under Planning refers to
In between review periods for the Plan, we	inclusion of assessment of impact development on extreme rainfall events within the
recommend that Plan-related implementation reports are published annually, or biennially, as appropriate.	planning application process.
	Chapter 6 of the LACAP details the reporting process for the Climate Action Plan. An
	annual report and possibly biennial report will be published and publicised in print and on WCCC's website.
	CE Recommendations: No modification is proposed to the Draft Waterford City &
	County Council Local Authority Climate Action Plan 2024-2029 on the basis of this
	submission for the reasons set out above.

Submission WFD-C25-CAP-8	Submission Summary	CE Response and Recommendation
(Dept of Ag) Sea Fisheries Coordination	Consider the seafood Sectoral Adaptation Plan during the SEA process and the European Commission's Communication on the energy	<b>CE Response:</b> The submission from the Department of Agriculture is welcomed and contents are acknowledged.
DAFM	transition of the fisheries and aquaculture sector as part of its Fisheries Policy Package	Just Transition for Communities is one of the strategic goals for the Climate Action Plan. Climate Action 4.25 refers to backing LECP business actions that support businesses transitioning to the green economy. Waterford City & County Council will continue to work with partners and other organisations to protect waters within the administrative area of WCCC, and to support Just Transition.
		<b>CE Recommendations:</b> No modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

Submission WFD - 22	Submission Summary	CE Response and Recommendation
Geological Survey of Ireland GSI	Make use of online GSI datasets	<b>CE Response:</b> The submission from Geological Survey Ireland is welcome and contents acknowledged.
		Waterford City & County Council in preparing and implementing this draft climate action plan has considered best practise, consultation with relevant stakeholders, and made use of all latest information available from relevant bodies, including GSI data where relevant.
		<b>CE Recommendations:</b> No modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

Submission – WFD 23	Submission Summary	CE Response and Recommendation
Dept of Transport	Local Authority climate action plans should recognise the need to identify additional measures to deliver the level of ambition required. This includes, the identification and implementation of further road space reallocation opportunities, pedestrian and cycling enhancement plans as well as various demand management measures. In this context, there are several important 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.	CE Response: The submission from the Department of Transport is welcome and contents acknowledged.  The Climate Action Plan will support the integration of land use and transportation as outlined in the Waterford County Development Plan 2022-2028, carried out in line with all relevant policies and CAP23 metrics. The Climate Action Plan will reflect all relevant national and local EV targets, the Clean Air Strategy (CAS) and the National Sustainable Mobility Policy (SMP), the transport actions from the national Climate Action Plan, and the Transport Sectoral Adaptation Plan  Actions 2.1, 2.2 & 2.3 will reduce emissions from WCCC fleet.
	Local Authorities should acknowledge their central role in influencing, and advocating for, climate action with respect to sustainable transport policy and sustainable mobility & behavioural change.  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.  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.	Action 2.3 commits WCCC to develop and adopt an Electric Vehicle Charging Strategy.  Action 2.9 ensures WCCC's commitment to delivering Active Travel projects across the county to encourage use of active travel modes such as walking or cycling.  Actions 2.6, 2.9, 2.11, 2.12, 2.23, and 4.6 reference WCCC's commitment to advocating for sustainable mobility and behaviour change.  WCCC has three participants in the current Smart and Sustainable Mobility Accelerator Programme (SSMA)

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

Local authorities should therefore seek to ensure that their climate action plans are cognisant of and aligned with the Clean Air Strategy (CAS) and the National Sustainable Mobility Policy (SMP).

When revising and updating adaptation pans and actions for the new LACAPs, Local Authorities should consider the following relating to Transport infrastructure adaptation:

Alignment with national Climate Action Plan adaptation actions for Transport

Consideration of the most recent approved statutory Transport Sectoral Adaptation Plan findings

The Waterford Metropolitan Area Transport Strategy was completed in 2022 and the Council's Active Travel Team are delivering the projects identified in conjunction with the EPA. Local transport plans are currently being drafted for Tramore and Dungarvan.

**CE Recommendations:** No modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

Submission – WFD 24	Submission	CE Response and Recommendation
	Summary	
National Federation of Group Water Schemes	Involvement of Group Water Schemes, support their community engagement.	CE Response: The submission from the National Federation of Group Water Schemes is welcome and contents acknowledged.  WCCC recognises the work done by the National Federation, and by water schemes within Waterford in relation to water quality and water conservation.  Group Water Schemes will continue to be supported by Waterford City and County Council  CE Recommendations: No modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

Submission – WFD 25	Submission Summary	CE Response and Recommendation
Regional Waste	Include some of	CE Response: The submission from the Regional Waste Management Planning Offices is welcome and contents
Management Planning	National Waste	acknowledged.
Offices	Management Plan	The WCCC Climate Action Plan shares many goals with the National Waste Management Plan, including the
	statement.	reduction of waste from businesses and the construction sector as shown in Climate Actions 5.1 through 5.11 under Waste. Support of the Circular Economy, a key driver of the National Waste Management Plan, is specified with regard to business engagement in Action 4.13, C&D waste in Action 5.1 building materials in Action 5.9, Green Public Procurement in Action 5.14. Waterford City & County Council will be cognisant of all relevant guidelines, best practise and standards regarding waste as set out in the National Waste Management Plan.
		<b>CE Recommendations:</b> No modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

Submission – WFD 26	Submission Summary	CE Response and Recommendation
Fáilte Ireland	To encourage tourism businesses throughout Waterford to engage with Fáilte Ireland supports to promote positive climate action.	CE Response: The submission from Failte Ireland is welcome and contents acknowledged.  WCCC recognises the importance of tourism for the economic and social development of County Waterford, and the support of Fáilte Ireland in same.  Climate Actions 2.42, 4.6, 4.11, 4.13 and 4.22 detail engagement plans for businesses (including but not limited to those in the tourist industry).  In addition, the goals of the Climate Action Plan, in making Waterford a greener county, fit with the growth of the tourist industry within the county.  CE Recommendations: No modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

Submission –	Submission Summary	CE Response and Recommendation
WFD 27		
Dept of Housing	We draw your attention to the	CE Response: The submission from the Department of Housing, Local Government and Heritage is welcome
	Climate Change Sectoral	and contents acknowledged.
	Adaptation Plan for Built and	Waterford City & County Council acknowledges the extent to which built and archaeological heritage is
	Archaeological Heritage	vulnerable to climate change and requires suitable adaptation measures for its protection.
		Climate Action 2.53 under Built Environment and Transport specifies the development of a County Heritage
	Identify the built & archaeological	Plan with climate action as a goal, including but not limited to built heritage. Action 2.54 specifies a climate risk assessment of local authority owned built heritage assets to identify those at risk from climate-related
	heritage assets in the LA area.	damage.
	Include objectives to carry out	Climate Action 2.58 refers to the creation of a training programme for LA staff for assisting in climate resilient conservation of heritage structures.
	climate change risk assessment	
	for these structures and sites	These actions prescribe the development of adaptation and mitigation skills.
		CE Recommendations: No modification is proposed to the Draft Waterford City & County Council Local
	Include objectives to develop	Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.
	disaster-risk reduction policies to	
	built/archaeological heritage	
	Douglan the chille within the LA to	
	Develop the skills within the LA to	
	address	
	adaptation/mitigation/emergency	
	management issues.	

# **4.2 Submissions from Adjoining Local Authorities**

No submissions from adjoining Local Authorities were received.

# 4.3 Submissions on Chapters 1 - 6

# Chapter 4

Submission WFD- C25-CAP-1	Submission Summary	CE Response and Recommendation
Adam Houlihan – Member of the public	Review of the requirement for new employees to have a driving licence unless	CE Response: The submission from Adam Houlihan is welcomed and contents are acknowledged.  The requirement for Council staff to have a driving licence and access to a car is dependant on the job type and the necessity of driving as part of their job.
	necessary for the job.	CE Recommendation: No modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

Submission WFD-C25-CAP-3	Submission Summary	CE Response and Recommendation
Nephin Renewable Gas – Private Business	Suggested text: Signpost farms towards the Teagasc emissions reduction programme on Farm Inspection Visits,	<b>CE Response:</b> The submission from Nephin Renewable Gas is welcomed and contents are acknowledged.
Filvate business	with an emphasis on the benefits of anaerobic digestion.	WCCC recognise the importance of reducing farm emissions. Climate Action 3.23 refers to promotion of the Teagasc Signpost programme, which supports the transition of Irish farming towards more sustainable farming systems. This may include, but is not restricted
	Suggested text: Deliver a number of water protection projects focused on preventing nitrate run off from farms. Special emphasis should be directed towards existing case studies where water quality has improved on account of agricultural land management practices, such as the Timoleague watercourse, studied by Teagasc	to, the use of anaerobic digestion.  WCCC also recognises the importance of the provision of a decarbonised energy supply, as highlighted in the City & County Development Plan 2022-2028. Climate Actions 4.3 and 4.19 under Economic Development/Communities, and DZ Action 4.18 support and facilitate the local authority, businesses and the community in reducing their carbon footprint, which includes the use of renewable energy in festivals and other situations. These goals support the use of renewable energy including but not restricted to anaerobic digestion.
	Suggested text: Renewable Energy Use for festivals, including future use of Biomethane from a proposed AD plant at Reatagh, at the nearby All Together Now festival. Review affordability of HVO generators from local suppliers, whilst ensuring energy/fuel used is sustainably sourced. Review infrastructure needed to put in mains power for future festivals having due regard to environmental sensitivities such as European Sites and biodiversity related sensitivities.	A feasibility study on a pilot Anaerobic Digestor project is referred to in Climate Action 4.29. This action is underpinned by the need to ensure renewable fuel used in generators is sustainably sourced. The suggested text amendment does not introduce additional environmental effects not already considered at plan level (i.e. the impact of renewable fuel production and supply at high-level). It is noted the development of any Anaerobic Digestion facility will be separately environmentally assessed and mitigated against at project and operational level (via development consent, and the EPA licensing consent process, respectively).  WCCC are currently not in a position to conduct a feasibility study into the benefits of treating grass cuttings through AD.
	Adopt a policy to purchase a proportion of biomethane to offset the Council's gas consumption	Climate Action 3.24 refers to the provision of water protection projects focussed on preventing nitrate runoff from farms. Such projects will be informed by appropriate

Conduct a feasibility into the benefits of treating grass cuttings through AD

Work with GNI (Gas Networks Ireland) to facilitate installation of connections to the gas distribution and transmission systems

science and good-practice examples, as will be demonstrated in the forthcoming Implementation Plan.

Action 2.2 A change to wording of the action will provide WCCC with flexibility to use a variety of renewable fuels as they become available.

Amend action 2.2 as follows: Replace fossil fuels with renewable fuel in WCCC Fleet whilst ensuring energy/fuel used to power local authority alternative vehicles is sustainably sourced.

**CE Recommendations:** A modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

<b>Submission WFD-</b>	Submission Summary	CE Response and Recommendation
C25-CAP-4		
Ken Thomas –	More detail partnership with	CE Response: The submission from Ken Thomas is welcomed and contents are acknowledged.
Member of the	SETU in section 6.2	
Public		WCCC recognises the importance of partnership with the region's University and sees SETU as a key partner in
	Partner with SETU for	delivering the Climate Action Plan with the importance of access to timely, accurate research and information
	tracking goals	that SETU can provide. Areas identified as suitable for partnership are detailed in DZ Action 1.1, DZ Action 4.1,
		DZ Action 4.7, and DZ Action 5.9.
	Partner with SETU for Digital	
	Twin City	The mechanisms by which goals will be measured is to be conducted through CARO. All relevant information
		will be taken into account during this process, including suggestions from bodies such as SETU.
		All relevant information will be taken into account throughout the lifetime of the Climate Action Plan,
		including suggestions from bodies such as SETU, on projects such as the Digital Twin City.
		CE Recommendations: No modification is proposed to the Draft Waterford City & County Council Local
		Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

Submission WFD-C25-CAP-5	Submission Summary	CE Response and Recommendation
Dungarvan Tidy Towns – Volunteer group	Dungarvan depot - a quarter of that roof has solar panels installed. There could be solar panels on the roof of the Civic Offices	Waterford City and County Council welcomes the response from Dungarvan Tidy Towns and acknowledges its contents.
volunteer group	in Dungarvan. There is also a very large roof on the sports centre at Quanns in Dungarvan, which could presumably also	The Council has a target of reducing emissions across its own operations by 50% by 2030. The promotion and usage of renewable energy will be key to achieving this.
	take solar panels. Action 2.72 could be expand to be more specific in this regard	Under DZ Action 4.8, the Council will look to install solar energy in its buildings that have a floor area of greater than 250m <sup>2</sup> . Action 4.3 will see communities supported and encouraged to engage in climate action at the local level through the provision of bridge funding for energy
	The EV charging points in Scanlons Yard car park are not well positioned for optimal accessibility. There are not enough of them. And they are not suitable for larger	masterplans under the MOU through the SEAI SEC programme. The Community Climate Action Fund will further allow for communities to apply for funding for renewable energy projects under the theme of energy.
	vehicles such as delivery vans that could be re-charging while the driver takes his/her lunch break in Dungarvan.	Action 2.4 of the Local Climate Action Plan will see the Council deliver the County EV charging strategy. Under this strategy, existing and proposed charging infrastructure will be assessed to ensure areas in need of charge points are accounted for.
	Figure 7 on page 17 of the draft plan should be brought up to date to at least as far as Storm Babet e.g. the sea wall on the way to Youghal was breached, there was	The Local Climate Action Plan was drafted over the course of quarter 2 and 3 2023 and accounts for extreme weather up to this point. WCCC will continue to monitor extreme weather events going forward.
	serious flooding in places like Clashmore and Tallow, and also at Fr. Twomey's Road in Dungarvan.	A Flood defence strategy for the Dungarvan area is currently being drafted in partnership with the OPW and will address the different flood protection measures that will be used in the area.
	Reference flooding on the Gold Coast Road and elsewhere in Ballinacourty, flooding on the Clonea Road in Abbeyside where the sea wall is porous and too low, flooding at	Waterford City and County Council acknowledges the local impacts severe weather events may have on areas throughout the city and county (particularly those located near the coast). As a coastal county, flooding is highlighted as a significant risk associated with climate change. The Council will work cross-departmentally internally and collaborate with the OPW and local communities externally to adapt to and mitigate against flood risk.

the Pond in Abbeyside where the sea wall is also not fit for purpose.

Timeframe column entries should specify the year in addition to whether the action was to be achieved within the short, medium or long term.

Include a review of current use and configuration in order to determine, based on current use and potential changes in hybrid working, if employees could be consolidated on to floors.

Include Local Link as a stakeholder.

Spacious bus stops and real-time updates of busses

Specifically name An Taisce and NTA as stakeholders.

One school per year is unambitious, should aim for more

School bus places shortage should be addressed

Mandating anti-idling signage within a certain distance of school gates

Smart signage for Scanlon's Yard showing parking availability (or app or online function?)

As per Section 4.4, the timeframe for delivery of actions is broken down into short (within one year), medium (before 2027) and long-term (before 2029). Due to the variability in project delivery, actions have been specified in this manner to ensure they are delivered within a timeframe as opposed to a set year. This adheres to the "timebound" aspect of the SMART approach outlined in the Local Authority Climate Action Guidelines Annex A.

Waterford City and County Council will conduct a review of its building capacity and remote work possibilities for staff in accordance with Action 1.2.

Waterford City and County Council will liaise with the NTA to improve transport systems. This is inclusive of bus routes and associated facilities (Action 2.8).

The allocation of funding for school streets is allocated at a national level by the National Transport Authority of Ireland through the active travel programme. Waterford City and County Council, under Action 2.10, will collaborate with the Active Travel Team and Area Engineer to identify and work with schools to run a programme for safer active travel routes.

The allocation of bus school spaces does not fall under the remit of WCCC. Action 2.12 will implement and anti-idling campaign outside of primary schools. Signage will be required under this programme.

Waterford City and County Council has set out a number of actions in relation to the Natural Environment and Green Infrastructure under Strategic Goal 3. Action 3.13 will see sites identified for large-scale native and mixed woodland planting. Targets will be set for maintaining and planting native trees in rural and urban areas.

Waterford City and County Council will engage with Dungarvan TT and other relevant stakeholders in accordance with the objective of Strategic Goal 3 to enhance the health and wellbeing of all through enhanced connection with and access to nature (e.g. Actions 3.16 and 3.18).

Action 4.28 of the Local Climate Action Plan will ensure that immigrants/refugees that have been displaced as a result of severe climatic weather events (as decided by the relevant government department) are catered for with the support of the Local Authority Integration Team.

Specify planting trees appropriate for locations and weather where needed. Include the word native

Engage with Dungarvan TT on a number of specific green area projects; parks and green corridors

review of all housing estates that have been taken in charge to identify where estates entrances, greens and verges could be rewilded.

To cater for climate change immigrants/refugees that have been displaced due to the effects of climate change.

There should be a website (or page on the Council website) showing the overall action plan with quarterly progress updates so that the public can view progress and achievements, and maybe able to see opportunities for them to assist.

Waterford City and County Council will look to update members of the public at regular intervals on Local Climate Action Plan progress. An online format will be explored.

**CE recommendations:** No modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

Submission WFD-C25-CAP-6	Submission Summary	CE Response and Recommendation
Joshua Dyson – Member of the Public	Wind power is not always reliable and/or efficient and can cause some environmental harm	CE Response: The submission from Joshua Dyson is welcomed and contents are acknowledged.  The Climate Action Plan is written in line with the goals of the Waterford County Development Plan 2022-2028, including section 6.6 Renewable Energy, which details the use of renewable energy to achieve climate change emission reduction targets, including but not limited to wind power.  Action 2.72 and 2.74 relate to WCCC installing renewable energy on our own buildings or lands. These projects will be assessed for the best possible energy production capabilities bearing in mind environmental considerations.  CE Recommendations: No modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

Submission WFD-	Submission Summary	CE Response and Recommendation
C25-CAP-7		
Dungarvan	Feasibility study for flood	CE Response: The submission from Dungarvan Chamber is welcomed and contents are acknowledged.
Chamber –	protection (dredging?) in	
Representative	Dungarvan Bay	A Flood Defence Strategy is currently being formulated for Dungarvan in partnership with the OPW. This
organisation		strategy will identify the most effective methods of protecting Dungarvan from flooding.
		CE Recommendations: No modification is proposed to the Draft Waterford City & County Council Local
		Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

Submission WFD-C25-CAP-9	Submission Summary	CE Response and Recommendation
Community	Community Gardens Ireland believes	CE Response: The submission from the Department of Agriculture is welcomed and contents are
Gardens Ireland	that an urban agriculture or community growing action should be included as	acknowledged.
	part of Section 10 (Public Sector Leading by Example) of the National Climate Action Plan.	Waterford City and County Council recognises the significant role played by community gardens and allotments in the climate change challenge and will continue to support them.
	This action would require the Department of Housing, Local Government & Heritage to work with	Section 10 'Public Sector Leading by Example' primarily refers to internal actions undertaken by WCCC.
	and encourage all public bodies to help support and facilitate allotments / community gardens on vacant,	Action 4.18 under Economic Development/Communities refers to an increase in the number of community gardens on spaces operated by the council.
	underutilised and derelict land or sites owned by public bodies throughout the country.	Action 4.28 refers to a scheme to promote locally produced and organic food, including but not limited to allotments/community gardens.
		<b>CE Recommendations:</b> No modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above

Submission WFD- C25-CAP-10	Submission Summary	CE Response and Recommendation
Top Of The City – Volunteer Group	Publish allotments & community gardens policy  Formally commit to support & promote cg  review of idle, vacant and derelict land within Waterford City & Description of the county Council that could be used for community growing purpose  Waterford City and 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	The submission from Top of the City is welcomed and contents are acknowledged.  Waterford City and County Council recognises the significant role played by community gardens and allotments in the climate change challenge and will continue to support them.  Regular reviews of idle, vacant and derelict land operated by WCCC will continue to be carried out to identify suitable sites for multiple activities e.g. playgrounds, community growing etc.  Waterford City and County Council is not in a position to survey all households and to provide allotments for all who may request one.  Waterford Community groups are welcome to apply for festival funding from Waterford City and County Council for Community Garden Week events.  Action 5.11 clarification of what events can be delivered under the waste engagement campaigns will be added.  Amend action 5.11 as follows:
	opening and supporting a seed library  Support community growers network  Acknowledge community gardens week	Run waste engagement campaigns through the library services including events such as seed library exchanges, clothes swaps and repair cafes.  CE Recommendations: An addition to Action 5.11 is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

Submission WFD-C25-CAP-12	Submission Summary	CE Response and Recommendation
Not Here Not Anywhere – Volunteer Group	General observations - The Climate Action Plan should ensure a rapid phasing out of all fossil fuels including gas.  The Climate Action Plan should include a planned phasing out of existing connections to the gas grid.  The Climate Action Plan should ban fracked gas in its energy mix.	The submission from Not Here Not Anywhere is welcomed and contents are acknowledged.  Waterford City and County Council is required to reduce its own CO2 emissions by 51% by 2030 in line with national legislative requirements. WCCC Energy Management Policy sets out that the Council will to phase out fossil fuels across its own operations and services where possible eliminating gas heating in public buildings by 2025. This will contribute towards Ireland's national target of achieving a 51% reduction in greenhouse gas emissions by 2030 and long-term objective of achieving climate neutrality by 2050.
	The Climate Action Plan should 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	In accordance with Action DZ 4.13, Waterford City and County Council will remove all fossil fuel heating from all Council buildings.  Waterford City and County Council has sourced and will continue to source electricity that is 100% renewable.
	international treaty to complement the Paris Agreement and address the root cause of the climate crisis: fossil fuel  The Draft Climate Action Plan should detail the explicit commitment not to construct liquefied natural gas (LNG) infrastructure in Waterford.	There is no policy support specific to LNG infrastructure in Waterford's Development Plan.  Under Action 1.9 and through cross-departmental collaboration, Waterford City and County Council will consider endorsing the Fossil Fuel Non-Proliferation Treaty.
	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.	Through the Community Climate Action Fund, Waterford City and County Council will help communities to facilitate positive climate, biodiversity and energy actions within their local area. Through Climate Action Fund 1 − Building Low Carbon Communities − Waterford was awarded €524,000 in funding. This will be used to support community climate action initiatives across Waterford. Waterford City and County Council will manage the implementation of the fund on behalf of the Department of Environment, Climate and Communications and will oversee the

The Climate Action Plan should prioritise safeguarding against Energy Poverty

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 prioritised. This should involve rapid retrofitting and the decarbonisation and increase of accessibility of public transport.

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.

The Climate Action Plan should also include an accelerated program of retrofits and solar PV for all households and community buildings, on a government-run "install now, pay as you go" basis, so that having cash up-front is not a barrier.

The Climate Action Plan should add as an action the setting of an overall cap on the level of data centre energy demand that can be accommodated by the electricity grid in the county.

The Climate Action Plan should specify that new and existing data centres are required to provide flexibility to the grid at times of day and times of year when wind and solar energy on the grid is low relative to demand - and not allowing data centres to use fossil fuel generation as the means of providing this flexibility.

application process from communities. The themes to be addressed under the funding are home/energy, travel, food and waste, shopping and recycling, and local climate and environmental action. For larger renewable energy projects, these would come under the auspices of SEAI's RESS programme and would receive support through that scheme.

Action DZ 4.17 will look to continue to support the general public on energy poverty abatement schemes and assist in accessing funded schemes such as the Warmer Homes scheme.

Under 4.4.2 Strategic Goal 2: Built Environment and Transport, Waterford City and County Council has set an objective to reduce Council greenhouse gas emissions by reducing reliance on fossil fuels through increased energy efficiency, a move to active and public transport, deployment of renewable energy technologies, and influencing behavioural change internally and externally. Waterford City and County Council will seek to engage members of the public on these matters to ensure their implementation is for the public good. Public engagement will be conducted in a manner that allows all members of society to participate in and engage with.

Waterford City and County Council's County Development Plan does not contain a policy that supports the establishment of data centres. Grid constraints in Waterford would make a data centre in Waterford unfeasible. In regard to Data Centres Waterford City and County Council would defer to national policy which states that the Government has a preference for data centre developments that can demonstrate the

additionality of their renewable energy use in Ireland.

**CE Recommendations:** No modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

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.

Submission WFD-	Submission Summary	CE Response and Recommendation
C25-CAP-13		
Mícheal O Cadhla  – Member of the	Could there be some greater detail included in the plan as to who the external	The submission from Mícheal O Cadhla is welcomed and contents are acknowledged.  In relation to clearly identifying external stakeholders, due to the broad and varied nature of the
public	stakeholders might be (even general headings) and also the method of engagement?	plan, this is something that will need to be done over time. Certain actions may require input from multiple bodies prior to or during the execution of action delivery.
	Could KPI metrics include an estimate of emissions reduced?	The proposal for emissions reductions metrics is noted. Waterford City and County Council has a breakdown of its emissions within the Local Climate Action Plan and will look to reduce emissions across its own service areas in accordance with national targets. The Council will look to deliver this information in a universally user-friendly format such as an online dashboard to update internal staff,
	It would be valuable to state in the plan how this information (actions taken) would be	external bodies, the general public etc on climate action progress.
	shared to an appropriate audience; information being available in a single dashboard format which could be made	The specific method of updating the public will be decided upon by the CARO in 2024 and all Local Authorities will need to put that reporting system in place.
	available to WCCC management, WCCC staff,	

elected representatives and even the general public.

is there a schedule for reviewing progress on the actions listed, with the potential to adjust priorities or identify additional resources required to achieve the targets? Would this review process allow for the addition of new targets, or modify existing ones, based on new information, legislation, or technological advances?

Extend the energy rates engagement beyond the specific activity required to qualify for the discount? Could there be an ongoing engagement with businesses whereby further supports are offered? Is number of businesses involved the best KPI?

Could we get back the School Street at Glór na Mara in Tramore?

After the initial phase of the anti-idling campaign in primary schools, can it be extended to other areas?

Mobility Plan -

How would large employers be encouraged to do the same? Could this be incentivised in some way such as by featuring the good work of a business in a social media post or some other form of recognition? Once the The Plan will have an annual review process. Any changes made to targets or actions will need to undergo public consultation prior to being approved and, if required, undergo an environmental assessment.

The Commercial Energy Rates Discount is requiring businesses in 2024 to put forward a plan for how to reduce emissions in their business, this is building on the works that have been done to date by businesses, and in subsequent years businesses will report back on their progress in emissions reduction. Support is being provided by the Climate Action Team and LEO to help businesses access finance for sustainability improvements and to help them market their efforts. To date the number of businesses involved has been the KPI but with further involvement and data collection the KPI will emissions reductions. Businesses will be able advertise their efforts through accreditation in the Carbon Neutral Waterford scheme.

The Glor na Mara School Street was a pilot and is currently under review.

WCCC will look to work with large employers under Strategic Goal 4: Communities: Resilience and Transition to give all people of Waterford an opportunity to participate in the transition to a low-carbon economy that will build community, develop skills and benefit local business. Large employers will be encouraged to participate in this process through engagement/education plans for businesses about city centre transport and pedestrianisation using case studies under Action 4.6. Action 4.23 will also see a Waterford Carbon Neutral Business Programme developed in conjunction with the business community. The works associated with these actions will be publicised via Council social networks and in local media outlets as per the objective of Action 1.8 (Create climate action delivery social media).

Waterford City and County Council will work in partnership with GSI to deliver a geothermal survey of Waterford.

Under the Carbon Neutral Waterford programme large employers will be asked to gain the Smarter Travel Mark. This accreditation can be used for marketing

Section 6.3 refers to how Waterford City and County Council will report on progress in delivering on the Climate Action Plan

council has such a plan in place, could it be converted to a template or other resource format which could be passed to large employers?

Geothermal survey -Is there a plan by Geological Survey Ireland to do this anyhow?

Climate communications -

Could this communications plan include progress reports on the CAP? Is there a reason to specify it as being aimed at community and employer representatives and that the metric would be number of organisations engaging, or could the net be cast wider?

Circular Economy Action of C&D waste -Could this action include some form of support or information sharing to encourage other developers to do the same?

GPP Reboot Strategy -Could/should this section on GPP be updated to reflect the upcoming Green Public Procurement Strategy and Action Plan, or will this CAP be published before the new

GPP plan comes out?

Regarding action 4.31 the submission correctly states that all members of society should be involved in the effort to reduce emissions.

#### Amend action 4.31 as follows:

Create regular Climate Communications to keep the public up to date on how they can contribute to Climate Action in Waterford

Circular Economy Action of C&D waste – All contractors have a legal requirement to segregate and appropriately dispose of C&D waste.

At the time of writing, the national Green Public Procurement Strategy and Action Plan remains in draft format. It is likely that the Local Climate Action Plan will be published ahead of the national GPP Strategy and Action Plan. The Action to deliver a GPP Reboot Strategy will comply with all national guidance and as per Action 1.5 of the Local Climate Action Plan, GPP will be integrated into all Council Department work programmes. This will ensure a greener ethos is taken to Council procurement as a whole.

#### **CE Recommendation:**

A modification to action 4.31 is proposed within the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

Submission WFD-C25-CAP-14	Submission Summary	CE Response and Recommendation
Clonea Power Solar Action	Reintroduction of a park and ride system	Clonea Power Solar Action Group – The submission from Clonea Power Solar Action Group is welcomed and its contents are acknowledged.
Group – Volunteer Group	We request that ALL proposed planning applications for Energy Production will have due regard to environmental sensitivities such as biodiversity, European Sites, built heritage,	The need for a Park and Ride has been identified under the Waterford Metropolitan Area Transport Strategy and will be put in place under that strategy.
	protected species, riparian environments, water quality, air quality, landscape and visual amenity, cultural heritage, and sensitive human receptors. Particular emphasis was placed on nocturnal bats throughout the draft.	Waterford City and County Council will ensure that it complies with all relevant environmental legislation in respect of proposed planning applications for energy production. Under the EU Strategic Environmental Directive, which has been transposed into Irish law, the Council will ensure that the relevant environmental assessments are carried out to ensure that biodiversity, European Sites, built heritage, protected species, riparian environments, water quality, air quality, landscape and visual amenity, cultural heritage, and sensitive human receptors are duly
	We request that all planning applications for renewable energy projects consult with ENERGY Experts.	considered. Strategic Goal 3: Natural Environment and Green Infrastructure has an objective to protect and enhance Waterford's blue and green infrastructure to ensure biodiversity is supported, nourished and expanded upon, to mitigate against climate change risks and to enhance the health and wellbeing of all through enhanced connection with and access to
	We propose that the Local Authority in similar public Consultations going forward send out the plan to the most relevant persons and Societies to	nature. Action 3.1 and 3.2 will ensure that a county habitat and ecosystem survey and county biodiversity plan is delivered to further ensure conservation of sensitive species and areas.
	request their contribution rather than waiting for them to come to the Website. For Example, this Draft Climate Action plan could have been sent to	Waterford City and County Council will adhere to best practices and guidance in relation planning applications for renewable energy projects.
	the young academics studying Science and Engineering in our local SETU and surrounding third level colleges to get their input from a scientific environmental and engineering point of view.	In addition to the statutory consultation requirements set out in the LACAP guidelines, Waterford City and County Council held multiple public consultation events throughout the City and County to engage members of the public and generate feedback. These events were advertised extensively across Council social media channels and through local media outlets. These events are documented within the CE report.
	Consultation with experts in individual Specialised fields to ensure any plans or projects WILL NOT	

adversely affect our natural habitats and protected species.

Planting of 100,000 trees. The Plan must include where they will be planted and what species of native trees. While vital for sequestering carbon, consideration must be given to the long-term effects of planting such a high number of trees such as damage to footpaths and roads, maintenance, and Health & Safety when storms occur in the latter periods of their lifespan.

we feel it is imperative that local Authorities complete their own assessments for all projects which will affect the Environment, impact on Health & Safety and that the local authority will have in place a Full clear and precise Breakdown for Bonds associated with projects.

Further exploration of solar rooves beyond the city and further exploration of hydroelectricty across the county.

Consideration to solar towns rather than use of grassland

In the implementation of a tree planting strategy, Waterford City and County Council will ensure compliance with all relevant guidance from the Department of Agriculture, Food and the Marine, Teagasc and Coillte. The planting of trees will be done in accordance with the principle of "right tree, right place".

Waterford City and County Council has direct control over the implementation of renewable energy in relation to its own buildings. In this regard, the Council will explore options for further implementation of solar rooves, similar to the project at Dungarvan depot. Action 2.73 under Strategic Goal: Built Transport and Environment will ensure all Council buildings with a floor area of greater than 250m² and that do not have conservation restrictions are fitted with renewable energy systems.

UTL 13 of the County Development plan refers to hydroelectric power - Promote and encourage the use of renewable energy, and low carbon resources, namely solar photovoltaic, geothermal, heat pumps, district heating, solar thermal, hydro, tidal power, offshore and onshore wind, biomass as well as micro-generation among business, agriculture, education, health, and other sectors.

The transition to low carbon future requires a mix of energy sources, solar farms, solar on rooftops, solar thermal, wind etc. As solar on household rooftops provides typically 1/3 of the electricity that a building needs, energy from solar farms and wind will also be needed along with energy storage and grid optimisation.

**CE Recommendations:** No modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

Submission WFD-C25-CAP-15	Submission Summary	CE Response and Recommendation
TASC and Waterford Area Partnership –	Recommendation of establishing a task group in the city for the DZ	TASC and Waterford Area Partnership – The submission from TASC and Waterford Area Partnership is welcomed and its contents are acknowledged.
Charity and Not for Profit	we recommend that in pursuit of a Just Transition in Waterford, this Climate Action Plan and its associated actions	Waterford City and County Council will establish a task group in the city for the city's decarbonising efforts Action DZ 1.1.
	should seek to address inequality and contribute to the eradication of poverty in Waterford. As such, we recommend that communities experiencing socioeconomic exclusion and marginalisation, such as Larchville and Lisduggan, are invested in, engaged with, listened to,	Waterford City and County Council, in its pursuit of local climate action, will seek to ensure a just transition for all members of society. This is reflected in actions which specifically target social housing and energy upgrades (2.60, 2.66-2.69). Where the Council has direct control, it will look to improve the quality of services for its citizens and where it does not, it will look to use its position to influence positive change to make Waterford a cleaner, greener and more sustainable place for all who live in, work from and reside in the county.
	and supported to benefit from the transition to zero emissions.	<b>CE Recommendations</b> : No modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

Submission WFD-C25-CAP-17	Submission Summary	CE Response and Recommendation
Global Action Plan – Not for profit	Encouragement and development of local, informed climate decisions  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.  Further reflection on "just transition" specific actions  We would welcome a more explicit	Global Action Plan – The submission from Global Plan is welcomed and its contents are acknowledged.  The Local Climate Action Plan will look to address the barriers people face in addressing climate change. The challenge of climate change is not defined by spatial boundaries and therefore requires a collective and holistic approach. Engagement with local citizens and stakeholders is considered particularly important in this regard. In its approach with such groups, the Council will ensure to uphold the principles of a just transition to ensure no member of society is left behind. The Community Climate Action Fund will play a key role in engaging local citizens and community groups to address climate challenges across a number of themes. This will assist in the bridging of knowledge gaps and the addressment of barriers. Regular Climate Cafes (Action 4.24) will provide the public with a place where they can explore their feelings and the opportunities there are for them to feel empowered taking action.  The 32 actions being delivered under Strategic Goal 4: Communities – Resilience and Transition are
	emphasis on the role Waterford City & County Council sees for itself in supporting allotments and community gardens throughout the County.	designed to engage all groups in society in a just transition. Specific actions that relate to alleviating energy poverty (Action 1.26, 2.59, 2.65, 2.67) will also create a Just Transition.  (See responses to submissions WFD9 and WFD10).  CE Recommendations: No modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

Submission	Submission Summary	CE Response and Recommendation
WFD-C25-CAP-18		
D. Heffernan – Member of the	Can public lighting be linked to renewable energy?	D. Heffernan – The submission from D. Heffernan is welcomed and its contents are acknowledged.
Public	Can direct links be created between OPW, NPWS, Biodiversity Ireland and the planning office, to ensure more co-ordinated and ultimately successful outcomes?	Under Action 2.72, Waterford City and County Council is currently contractually committed to replace street lighting with LED energy efficient equivalents with lighting controls to save energy. These lights are powered from the main electrical grid, which is incrementally becoming more reliant on renewable sources of energy. Under Action 2.74 and in coordination with other county councils,
	Highlight within the main body of the plan area's where Climate change is currently having an impact. This includes area's prone to flooding, Locations within the county prone to high rainfall, area's that have	Waterford City and County Council procures its electricity through a national framework, under this framework WCCC's electricity is 100% renewable and will continue to be so into the future.
	undergone significant change such as green areas, loss of floodplains and reclamation of land, this information is available from OPW, NPWS, Biodiversity Ireland and the planning office, it needs to be co-ordinated.	Waterford City and County Council will continue to work with the OPW, NPWS, Biodiversity Ireland and the planning office to ensure a cohesive approach is taken to climate-related projects. The Council will look to maintain an open line of communication with these bodies to improve flood maps, mapping of ecologically sensitive areas and other GIS tools.
	Develop a map of habitats at risk from Climate Change. Map and protect strategic agricultural land. Develop a monitoring programme for habitats at risk and habitats which can mitigate the effects of Climate Change. And put measures in place to protect them.	Action 3.2 of the Local Climate Action Plan will see a County Biodiversity Plan developed with climate action as a cross-cutting theme/goal which will include mapping of the habitats at risk.
	Prepare a climate proof biodiversity plan	Flood Defence Strategies are being drafted for Waterford in conjunction with the OPW. These strategies will identify the appropriate flood prevention solution for each area.

Cheekpoint to avoid future flooding?	<b>CE Recommendations:</b> No modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.
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Submission	Submission Summary	CE Response and Recommendation
WFD-C25-CAP-19		
B. Nowlan –	Regarding 2.4: Please don't forget about	The submission from B. Nowlan is welcomed and its contents are acknowledged.
Member of the	small towns with terraces and narrow	The submission from 2. Nowlands welcomed and its contents are deknowledged.
Public	roads. Some solution is required to allow residents easy access to charging points for electric vehicles.	The delivery of the County EV strategy under Action 2.4 will see charging points implemented in areas that have been identified as having a need for them, these areas will include terraced streets. It is envisioned that charging points will be strategically placed throughout the county so that issues pertaining to "range anxiety" and access can be amply addressed. DZ Action 10.14
	2.6: It's not entirely clear what the 'hubs' will be, but increased availability of GoCars, or some other carshare option,	also calls for the creation of an EV charging strategy, which will detail placement of chargers in Waterford according to best practise re safety and accessibility.
	would allow people to forgo private car ownership when they only need a car occasionally, people working from home,	An e-mobility hub is a single location which brings together various modes of active transport. This includes electric cars, bikes, scooters and public transport options.
	for example.	Waterford City and County Council will liaise with the NTA to improve to improve bus facilities in Waterford as per Action 2.8.
	2.14: I fully support incentives for	
	carpooling, but more buses and car share	The School Streets programme will be opened up to all schools who are interested. The onus is
	options should also be considered.	on schools to apply and commit to the programme.
	2.9: The goal of one school per year	Action 1.11 of the Local Climate Action Plan seeks to ensure all Council staff are provided with climate action training so that they are prepared for and capable of adjusting to the impacts of

seems low. It will take a long time to complete.	climate change. Staff working in relevant areas will be involved in nature and/or biodiversity training (Actions 2.18, 2.22)
Training should be required for all staff on	Action 3.11 will provide training for Council staff on biodiversity.
biodiversity.	CE Recommendations: No modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the
	reasons set out above.

Submission	Submission Summary	CE Response and Recommendation
WFD-C25-CAP-20		
C. Kiely – County Councillor	Plans put in place to monitor the impact of Climate Change on Waterford Communities	The submission from C. Kiely is welcomed and its contents are acknowledged.  Waterford City and County Council will work with local communities during the lifecycle of this plan
		to ensure climate adaptation and mitigation measures are implemented across Waterford. Action 3.4 will support the establishment of a National Climate Framework, similar to the All-Ireland Pollinator
	Implementation plans for action delivery should be shared with Councillors	Plan, whereby resources and knowledge can be provided to the public on climate action topics.
	following Climate Action Plan publication.	Section 6.3 reporting on the Climate Action Plan will be carried out annually. There will be an online dashboard where the public can learn of successes to date and follow progress.
	Ongoing monitoring being made available to elected representatives who would like to keep up with progress on the plan	Engagement with communities will occur via the Community Climate Action Fund. Progress on these matters will be shared with Councillors at Council meetings to ensure they are informed and updated on climate action within their constituencies.
		<b>CE Recommendations:</b> No modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

1 Sustainable Urban Drainage systems ould be included in all Council frastructure projects. Nature Based plutions should be included at the esign stage.  2 and 2.3 should include public vareness raising once projects are in ace.  5 Could we consider more resilient ants and move away from plants that eed constant watering  10 Collect seeds locally to grow saplings ost suitable for the local environment. et public involvement.  12 Inclusion of community composting iority Area - Planning - Can we consider ender in urban planning	CE Response: The submission from Susan Gallagher is welcomed and contents acknowledged.  Sustainable Urban Drainage Systems (SUDS) are referred to in Climate Action 2.18 under Roads Management and Climate Action 2.35 under Planning, specifically referencing that planners will undergo regular training that includes SUDS. SUDS are referred to in DZ Action 2.1 for incorporation in street upgrades, Council building projects, and private developments within the Decarbonising Zone. SUDS are referred to in Climate Action 3.27 under Water Quality with respect to ensuring that new housing and streetscapes incorporate SUDS.  The development and promotion of Rain Gardens in DZ Action 2.2 and Climate Adaptation in DZ 2.3 will include as part of the projects, educational promotion programmes.  The planting of appropriate species of native trees is accounted for in DZ Action 2.11, which states that tree planting shall be overseen by a competent ecology team informed by habitat mapping. DZ Action 2.5 includes planting methodology that takes into account periods of drought, with a particular focus on hanging baskets.  Action 5.11 to be adjusted to include seed libraries, clothes swaps and repair cafes.
fra: fra: fra: fra: fra: fra: fra: fra:	and be included in all Council structure projects. Nature Based tions should be included at the gn stage.  Ind 2.3 should include public reness raising once projects are in e.  Could we consider more resilient ts and move away from plants that d constant watering  Collect seeds locally to grow saplings t suitable for the local environment. public involvement.  Inclusion of community composting

9.2 Would Waterford CCC a Zero Waste Festival

9.6 can clothes swaps be extended to cover many areas like seeds, toys, uniforms.

Priority Area - Transport - Have barriers to walking a cycling been examined.

Waterford has done some good GIS projects. Could a GIS of footpath condition be developed? This would not just include physical condition of footpaths, but also other aspects such as lighting, passive surveillance, traffic speed etc.

Awareness campaign about Zebra crossings

More permeability schemes to make it easier for people to get from one estate to another

Support of increased use of locally produced compost is referred to in DZ Action 2.12.

Gender based design – WCCC follows national guidance in relation to public space design. This guidance takes into account the needs of the different users of the space.

DZ Action 9.2 refers to a Zero Waste Waterford Campaign in the City which may have involvement in festivals, and through action 4.15 WCCC are currently working with festival organisers to reduce waste. At present WCCC are not in a position to run a separate Zero Waste Festival but would welcome hearing from any community group who might be interested in facilitating such a festival.

DZ Action 9.6 refers to library-hosted item repair and swap events.

Action 2.9 under Roads Management details engaging with Active Travel goals, which include overcoming barriers to cycling through permeability schemes, bicycle lanes, and other projects.

The behavioural barriers to cycling and walking in Waterford City have been examined in the Cycling and Walking Index. This study will be available in March 2024 and the findings will inform Active Travel projects going forward.

DZ Action 5.5 refers to a road safety campaign, which would include information on zebra crossings as part of its curriculum.

	Seed Library has been addressed in the modification of Action 5.11
	CE Recommendations: No modification is proposed to the Draft Waterford City & County
	Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the
	reasons set out above.

Submission – WFD 28	Submission Summary	CE Response and Recommendation
Hugh O'Brien	Campaign by IS seeking auto power- down of all networked devices and equipment outside core/certain hours? (1.17)	CE Response: The submission from Hugh O'Brien is welcome and contents acknowledged.  All energy saving actions that can be made by council staff shall be included in the Reduce Your Use campaign (Action 1.17)
	Corporate to deliver additional staff facilities for changing, lockers, showers and secure bike storage for the main office locations in order to support transition of sustainable modes (1.27)	Action 2.17 refers to a Council Mobility Plan, which will include reviews of available cycling facilities and provision of new facilities should they be required.

Focus on on-street charging points or include on-street charging points	DZ Action 10.14 refers to an EV charging strategy, which will include detail regarding on-street charging points where suitable.
as a minimum commitment (2.7)	
Could refer to Bus-connects and	Amend action 2.8 as follows:
integration of sustainable, public	Liaise with the NTA to improve systems:
and private transport modes. (2.8)	- Integration between rail and WMATS (North Quays)
	- Bus stop facilities
	- Bus Connects
Commitment to repurpose on-street and publicly owned car parks to amenity & biodiversity space (2.15)	Action 2.15 refers to the management of parking through Demand Constraints. Action DZ 2.9 refers to how the freed up space in car parks will be used i.e. community gardens and community space.
Retrofit underutilised hard surface	Action 2.18 requires each project to be assessed for what SUDs can be installed on that site.
areas/ pavements with pocket parklets and SuDS. Measurable KPI	Action DZ 2.1 includes a KPI for the number of projects with SUDs incorporated.
for this purpose, Redirect through	
traffic away from	
residents/pedestrian areas in the	
dev plan/NTA. (2.18)	

Planning decisions process to assess impact of new development proposed in areas determined to have a water supply and quality constraint Assess impact on wastewater discharges and DWWTS and mitigate impacts (2.34)	Amend action 2.34 as follows to changing wording from Planning Application Process to Planning Decision Process: Planning decisions process to assess impact of new development proposed in areas determined to have a water supply and quality constraint (i.e., from climate related drought, extreme rainfall events). Assess impact on wastewater discharges and DWWTS and mitigate impacts.
What does the geothermal survey means for WCCC. It might be useful to identify potential outcomes.  (2.36)	Amend action 2.36 as follows to include the benefits of completing such a study:  Carry out a geothermal survey of the county to identify areas with the greatest opportunity for heat production near Council buildings. Survey will include a feasibility assessment for the incorporation of Geothermal into existing heating systems
Wording is uncertain, what is this meant to achieve? (2.37)	Amend action 2.37 as follows to provide clarity: Life Cycle Analysis methodology, consideration of carbon emissions, and consideration of water quality impact to be used in housing and building works planning and for planning permission from 2027 following adoption of National Policy on Life Cycle Assessment.
Is there a national standard to meet for this? (2.39)	A forthcoming standard will be published by Irish Green Building Council with government approval

Unsure of wording here, goal not clear (2.56)	Amend action 2.56 as follows to provide clarity: Ensure climate-proofing of heritage funding administered by WCCC, with an emphasis on improved energy performance along with the main goal of conservation of buildings.
Is there a national standard to meet for this? (2.62)	Building Renovation Passports scheme will be delivered in accordance with a national standard developed by the Irish Green Building Council.
The dev plan includes a policy objective (BGI 03) to deliver a BGI strategy for the City and County which could be referenced here.  (3.8)	Amend action 3.8 as follows to mention the Blue Green Strategy currently in development:  Map green infrastructure (GI) – identify wildlife corridors, conservation and restoration spaces. Under the County Development Plan a Blue Green Infrastructure Strategy is being developed.
Perhaps include reference to SuDs here also while Env and Roads would have some responsibility (3.13)	All projects that can incorporate SUDs going forward will do so Action 2.18. This can be done for new developments or for the retrofit of older spaces with no permeability
Biodiversity gain is central to achieving the strategic outcomes of the development plan and referenced in Section 1.6(e), 3.8 in volume 1 and the development management standards in Volume 2. Environment could have a role to	All Climate Actions will be carried out in line with the specifics of the County Development Plan.

play here in addition to pla	nning
(3.15)	
Make goal more clear (3.2	Amend action 3.26 as follows to make goal clearer: Support and inform a climate-proofing
	programme for natural water resources to manage flooding at the catchment level. Through
	advising the farming community and running information campaigns.
Potential to enhance the in	Inspection Inspections are delivered by the WCCC following instruction from the EPA. Uisce Eireann does
regime on domestic septic	tanks in not have responsibility in this area
association with Uisce Éire	ann (new
action)	
Could be altered to include	e specific The fund application process has been adjusted to ensure that WCCC supported festivals are as
climate objectives where e	sustainable as they can be
licences are being provided	d for
events, esp around waste	
minimisation, energy use a	nd
generation (4.5)	
Wording unclear (4.16)	Amend action 4.16 as follows :
	Plan events around 'playful city' principles, E.g. Community Car Free afternoons on Sundays
	or on days of community festivals
	CE Recommendations: Seven modifications in wording are proposed to the Draft Waterford
	City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this
	submission for the reasons set out above.

### **4.4 Submissions from Young People**

Submission WFD-C25-CAP-16	Submission Summary	CE Response and Recommendation
1 <sup>st</sup> Year Engineering Class SETU	Action 2.1: Deliver Eco-Driver training to WCCC Fleet staff. The KPI for this is % Fleet staff trained. It is likely that WCCC keep records of fuel bought for its fleet. In addition to recording the number of staff members trained, a KPI could be the volume of fuel saved in the year following the training.  Action 2.11: Anti-idling programme. The KPI is difficult to measure. A system for monitoring air pollution outside schools both before and after the planned campaign would give measurable data, which would indicate whether or not the campaign was having the desired effect.	The submission from the SETU students is welcomed and its contents are acknowledged.  Waterford City and County Council does keep records of fuel consumption of its fleet. The Council will outline the monetary and CO2 savings made in transitioning its fleet to renewable resources as per Actions 2.1, 2.2, 2.3 and 2.4.  As specified in 6.3 KPIs outside of carbon emissions reduction will be identified once the Plan is adopted. Air pollution monitoring will be used outside of schools participating in the anti-idling campaign. Air pollution data will be used to verify campaign success.  CE Recommendations: No modification is proposed to the Draft Waterford City & County Council Local Authority Climate Action Plan 2024-2029 on the basis of this submission for the reasons set out above.

Submission – WFD 29	Submission Summary	CE Response and Recommendation
School Climate Conference & Youth Advisory Climate Council		
	More accessible language required (All Actions)	<b>CE Response:</b> The submission from the School Climate Conference and the Youth Advisory Climate Council is welcome and contents acknowledged.
		Amend Overview section as follows: A glossary of technical or specific terms is to be added at the beginning of the Climate Action Plan
	Consider the effect of climate actions on local businesses (Actions 2.21, 2.23, 2.47 and 4.8)	Climate Action 4.6 details an engagement plan for businesses specifically focussing on changes to city centre transport and pedestrianisation.
	Make clear sources of funding for these Actions (Actions 1.19, 1.24, 1.26 and 4.3)	A number of funding sources have been identified and further funding is expected to come on stream during the period if the plan so can't be listed.
	Promotion of electric scooters should consider the negative perception they have among some of the public, and lack of clarity over the legality of their use (2.6)	At the time of writing, new legislation coming into force has classified e-scooters and clarified their legal status(Road traffic and Roads Act 2023)
	Marketing/branding of School Streets programmes should emphasise child safety (2.9)	The School Streets programme does emphasise child safety and is delivered by the NTA with support of WCCC.
	Mapping green infrastructure is positive but more detail will be required about ownership of spaces and how 'connections' between them will be made. (3.8)	The Blue/Green Infrastructure Strategy which is currently being drafted is considering ownership and connections.
	Young people should be involved in tree-planting initiatives through schools and youth councils. Results should be available to the public. (3.13)	Waterford City and County Council has run a number of planting programmes in partnership with schools and Comhairle na nOg and will continue to do so.

Waste engagement campaigns	Action 5.11 is currently underway in libraries with due consideration being given to accessibility of
through library services should	materials.
include basic	
recycling/composting information	
suitable for children and young	
people. (5.11)	
The Climate Action Team will	Action DZ 1.4 relates to a funded project that WCCC hopes to deliver. Having a presence means having
'have a presence' across areas of	WCCC staff working with stakeholders in different city areas on climate adaptation and emissions
Waterford City. This text needs to	reducing projects
be more precise (DZ.14)	
	CE Recommendations: A modification in wording is proposed to the Draft Waterford City & County
	Council Local Authority Climate Action Plan 2024-2029 in the addition of a glossary on the basis of this
	submission for the reasons set out above.

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

Table 7: Minor modifications proposed by the Chief Executive

Draft CAP Section and Page	Proposed Modifications	SEA & AA Assessments
Introduction page 3	Addition of a glossary	No SEA or AA implications as this is a readability
		issue
Chapter 4, page 31	Action 2.2 modification of wording to:	This amendment clarifies the text of the action
	Replace fossil fuels with renewable fuel in WCCC Fleet whilst ensuring	previously considered and mitigated against
	energy/fuel used to power local authority alternative vehicles is	through the development and Environmental
	sustainably sourced.	Governance Principle framework. It considers
		the sources of the energy and fuels to be used by
		the LA vehicles. This amendment will not
		introduce any significant environmental effects
		not already considered and mitigated against in
		the SEA and AA process
Chapter 4, page 32	Action 2.8 modification of wording to:	This amendment clarifies text of an action
	Liaise with the NTA to improve systems:- Integration between rail and	previously considered. It clarifies the focus of the
	WMATS (North Quays)- Bus stop facilities- Bus Connects	action and in particular how the Council will use
		its control and influenceto support the Bus
		Connects programme. This amendment will not
		introduce any significant environmental effects
		not already considered and mitigated against in
		the SEA and AA process.
Chapter 4, page 36	Action 2.34 Planning decisions process to assess impact of new	This amended action provides clarification to the
	development proposed in areas determined to have a water supply and	text previously considered. This amendment will
	quality constraint (i.e., from climate related drought, extreme rainfall	not introduce any significant environmental
	events). Assess impact on wastewater discharges and DWWTS and	effects not already considered and mitigated
	mitigate impacts.	against in the SEA and AA process.

Chapter 4, page 36	Action 2.36 modification of wording to:	This amended action provides clarification to the
	Carry out a geothermal survey of the county to identify areas with the	text previously considered. It details the purpose
	greatest opportunity for heat production near Council buildings. Survey	of the survey and feasibility assessment. This
	will include a feasibility assessment for the incorporation of Geothermal	amendment will not introduce any significant
	into existing heating systems.	environmental effects not already considered
		and mitigated against in the SEA and AA process.
Chapter 4, page 36	Action 2.37 modification of wording to:	This amended action provides clarification to the
	Life Cycle Analysis methodology, consideration of carbon emissions,	text previously considered. It considers the
	and consideration of water quality impact to be used in housing and	National Policy on Life Cycle Assessment. This
	building works planning and for planning permission from 2027	amendment will not introduce any significant
	following adoption of National Policy on Life Cycle Assessment.	environmental effects not already considered
		and mitigated against in the SEA and AA process.
Chapter 4, page 38	Action 2.56 Ensure climate-proofing of heritage funding administered	This amended action provides clarification to the
	by WCCC, with an emphasis on improved energy performance along	text previously considered. This amendment will
	with the main goal of conservation of buildings.	not introduce any significant environmental
		effects not already considered and mitigated
		against in the SEA and AA process.
Chapter 4, page 43	Action 3.26 modification of wording to:	This amended action provides clarification to the
	Support and inform a climate-proofing programme for natural water	text previously considered. It considers the
	resources to manage flooding at the catchment level. Through advising	farming community and information campaigns.
	the farming community and running information campaigns.	This amendment will not introduce any
		significant environmental effects not already
		considered and mitigated against in the SEA and
		AA process.
Chapter 4, page 40	Action 3.8 modification of wording to:	This amendment clarifies the text of an action
	Map green infrastructure (GI) – identify wildlife corridors, conservation	previously considered. It references the Blue
	and restoration spaces. Under the County Development Plan a Blue	Green Infrastructure Strategy being developed
	Green Infrastructure Strategy is being developped.	under the County Development Plan, which has
		been subject to its own SEA and AA. This
		amendment will not introduce any significant
		environmental effects not already considered
		and mitigated against in the SEA and AA process.

Chapter 4, page 45	Action 4.16 modification of wording to: Plan events around 'playful city' principles, E.g. Community Car Free afternoons on Sundays or on days of community festivals	This amended action provides clarification to the text previously considered. This amendment will not introduce any significant environmental effects not already considered and mitigated against in the SEA and AA process.
Chapter 4, page 46	Action 4.31 modification of wording to: Create regular Climate Communications to keep the public up to date on how they can contribute to Climate Action in Waterford	This amended action provides clarification to the text previously considered. This amendment will not introduce any significant environmental effects not already considered and mitigated against in the SEA and AA process.
Chapter 4, page 47	Action 5.11 modification of wording to: Run waste engagement campaigns through the library services including events such as seed library exchanges, clothes swaps and repair cafes.	This amended action provides clarification to the text previously considered. It adds more examples of engagement campaigns that could be done. This amendment will not introduce any significant environmental effects not already considered and mitigated against in the SEA and AA process.

### **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 3 weeks to consider this Chief Executive's Report, in accordance with the requirements of the Climate (Amendment) Act 2021. Elected Members will be briefed at a meeting in the first week of February to provide an overview of the Chief Executive's Report and in February 2024 Council Meeting of Waterford City and 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 Waterford City and 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:

Gráinne Kennedy

**Climate Action Coordinator** 

Dawn Wallace

Senior Executive Officer, Environment

Fergus Galvin

**Director of Services** 

## Appendix A: List of Persons, Organisations and Bodies who made Submissions

WFD-C25-CAP-1	Adam Houlihan
WFD-C25-CAP-2	EPA
WFD-C25-CAP-3	Nephin Renewable Gas
WFD-C25-CAP-4	Ken Thomas
WFD-C25-CAP-5	Dungarvan Tidy Towns
WFD-C25-CAP-6	Joshua Dyson
WFD-C25-CAP-7	Dungarvan and West Waterford Chamber of Commerce
WFD-C25-CAP-8	Sea Fisheries coordination DAFM
WFD-C25-CAP-9	Community Gardens Ireland
WFD-C25-CAP-10	'Top of the City' Garden
WFD-C25-CAP-12	Not Here Not Anywhere
WFD-C25-CAP-13	Mícheál O Cadhla
WFD-C25-CAP-14	Clonea Power Solar Action Group
WFD-C25-CAP-15	The Think-tank for Action on Social Change (TASC)
WFD-C25-CAP-16	1 <sup>st</sup> Year Engineering Students SETU
WFD-C25-CAP-17	Global Action Plan
WFD-C25-CAP-18	Deirdre Heffernan
WFD-C25-CAP-19	Brid Nowlan
WFD-C25-CAP-20	Cristiona Kiely
WFD-C25-CAP-21	Susan Gallagher
WFD-22	Geological Survey of Ireland
WFD-23	Department of Transport
WFD-24	National Federation of Group Water Schemes
WFD-25	Regional Waste Management Planning Offices
WFD-26	Failte Ireland
WFD-27	Department of Housing, Local Government and Heritage
WFD-28	Hugh O Brien
WFD-29	School Climate Conference & Youth Advisory Climate Council

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



Dungarvan Leader and Munster Express carried this notice on November 3<sup>rd</sup> and across the weeks of the consultation.

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

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

Modifications to the Draft Local Authority Climate Action Plan 2024 – 2029 for the Waterford City & County

Council functional area

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

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

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

The Modifications to the Draft LACAP have been made following a review of the issues raised during the prescribed public consultation period for the Draft LACAP from 1<sup>st</sup> November 2023 to 15<sup>th</sup> December 2023 and subsequent consideration by Waterford City & County Council.

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

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

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

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

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

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

Director of Sprvices

Signed by:

Date:

15-1-2024

### **AA Screening Conclusion and Determination**

Modifications to the Draft Local Authority Climate Action Plan 2024 – 2028 for the Waterford City & County

Council functional area

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

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

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

The Modifications to the Draft LACAP have been made following a review of the issues raised during the prescribed public consultation period for the Draft LACAP from 1st November 2023 to 15th December 2023 and subsequent consideration by Waterford City & County Council.

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

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

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

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

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

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

Signed by:

Date:

TELL SOLY