



**Comhairle Cathrach
na Gaillimhe**
Galway City Council

Chief Executive's Report on Draft Local Authority Climate Action Plan 2024 – 2029 Public Consultation

January 2024

Climate Action

Galway City Council

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1 Introduction

Purpose of the Report

Galway City Council has prepared a Draft Climate Action Plan 2024-2029, to create a low carbon and climate resilient City, by delivering and promoting best practice in climate Action, at the local level. The Draft Plan includes a range of Actions across the six theme areas of Governance and Leadership, Energy and Built Environment, Communities Resiliency and Transition, Environment and Biodiversity, Transport and Mobility and Sustainability and Resource Management.

Pursuant to Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021, notice of the preparation of the Galway City Council Draft Climate Action Plan 2024-2029, was given on Wednesday 4th October 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 4 weeks, from Wednesday 4th October 2023 to Wednesday 1st November 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 the Draft Plan Public Consultation is hereby submitted to the Elected Members of the Local Authority, for their consideration. The Elected Members have up to a maximum of 6 weeks to consider this Chief Executive's Report, in accordance with the requirements of the Climate (Amendment) Act 2021. Elected Members will be briefed on Monday 29th January

2024 to provide an overview of the Chief Executive's Report and Monday 12th February 2024 Ordinary Council Meeting of Galway City 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 (Note: The Climate (Amendment) Act 2021 does not provide for a Material Amendments stage, by reason of the 12-month timescale and the relevant Plan making stages, as set out in the Ministerial Guidelines).

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

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

An Environmental Report accompanies the Draft Climate Action Plan, which contains a detailed analysis of the Draft Climate Action Plan and how the implementation of the Plan would impact on its receiving environment. The Chief Executive's recommendations as set out in this report (including recommendations on the Environmental Authorities submissions detailed in Section 5), 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 Plan, it was considered that the modifications proposed on foot of recommendations in this Chief Executive's Report, would not have any significant adverse effect on the environment.

In accordance with requirements under Article 6 of the EU Habitats Directive (92/43/EEC) the Draft 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 was considered that the Draft Plan and modifications proposed on foot of the Chief Executive's recommendations,

alone and in combination with other plans and projects, would not have any significant effect on any Natura 2000 sites.

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

Background to the Climate Action Plan

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

The Draft Climate Action Plan sets a clear pathway for Galway City Council to:

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

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

The Draft Plan sets out how Galway City 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

In accordance with the provisions of Section 16 of the Climate (Amendment) Act 2021, the Draft Climate Action Plan underwent statutory public consultation, from Friday 24th November 2023 to Friday 29th 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).

In addition to the above, Galway City Council completed a non-statutory pre-draft public consultation 5 week survey from 2nd August 2023 to 8th September 2023 which received 118 responses which were used to formulate the draft plan, details of same are outlined in section 4.1.

3 Key Elements of the Public Consultation Process

The Draft Climate Action Plan public consultation process involved several key elements as outlined below.

- Online Public Notice on [Galway City Draft Local Authority Climate Action Plan \(LACAP\) Public Consultation | Galway City Council Online Consultation Portal](#)
- Galway City Council's public website contained details of the consultation process at the following location [GalwayCity - Galway City Council Climate Action Plan](#)
- Reports available for inspection at City Hall and public libraries across the city.
- Newspaper advertisements in Galway Advertiser in the November and December 2023 editions.
- Recurring social media posts (Facebook, Twitter, LinkedIn) during the consultation period to promote awareness of the public consultation period.
- GCCN engagement.
- Adjoining Local Authority engagement via Climate Action Regional Office(CARO)
- Notification to Prescribed Bodies.
- Three public information events took place as outlined below. The events were well attended in each of the areas with a total attendance estimated at 150 attendees.
 1. Westside Community Centre, Galway City, Tuesday 28th November 2023
 2. Knocknacarra Community Centre, Galway City, Tuesday 5th December 2023
 3. Renmore Community Centre, Galway City, Tuesday 12th December 2023

4 Details of the Submissions

Introduction

The statutory draft plan consultation process was open from 24th November 2023 to 29th December 2023, during which time there were a total of 30 valid submissions and observations were received, the breakdown of which is as follows:

Table 1: Count of submissions received

Submission Type	Number
Online Portal Submissions	16
Posted / Handed Submissions	2
Email Submissions	12
Total Submissions	30

All valid submissions and observations were read, analysed and summarised. A categorisation and summary of issues raised, together with the Chief Executive's (CE) response and recommendations, is contained in Section 5.

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.

List of Persons, Organisations and Bodies who made Submissions

There were 30 valid submissions and observations received for the Galway City Council Draft Climate Action Plan; these were read, analysed, and summarised. Table 2 lists the persons, organisations and bodies that made written submissions. A broad range of items were identified from the submissions and observations received. Each submission has been assigned an independent reference number, summaries of issues raised in the submissions and observations are set out in Section 5, along with the responses and recommendations of the Chief Executive.

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

ID	Name
1	Development Applications Unit – Department of Housing, Local Government and Heritage
2	Uisce Éireann
3	Department of Agriculture Food and the Marine Seafood
4	Department of Agriculture Food and the Marine
5	EPA
6	Marie Hanna Curran
7	Hinterland

8	Community Gardens Ireland
9	Louie Maguire
10	Kinvara Climate Action
11	Global Action Plan
12	Galway City Community Network
13	Ian Coleman
14	Galway National Park City Initiative
15	Galway Greens
16	Conor Dowd
17	Malena Thren
18	People Before Profit Galway
19	Cllr. John Connolly
20	University of Galway Students Union Climate Crew
21	Brendan Mulligan
22	Port of Galway (submission by MKO)
23	Centre For Environmental Living and Training (CELT)
24	Philip O'Toole
25	Gerard Leahy
26	Third Space Galway
27	Fair Seas
28	Irish Bioenergy Association (IrBEA)
29	James McCarthy
30	Peadar ó hUallacháin

Chief Executive's Responses and Recommendations

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

In the interests of clarity: Issues raised in submissions that:

- do not sit within the scope of the draft local authority Climate Action Plan,

- go beyond its scope but lie within the scope of the local authority,
- go beyond the functions of the local authority and/ or,
- are not directly related to the provisions of the draft plan or climate Actions;

will be subject to general comment where appropriate, and may not be considered further to inform the provisions or Actions of the final plan.

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

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

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 in the recommendations throughout section 5 and summary are shown in **green text**, deletions to the text of the Draft Climate Action Plan are shown in **red text with strikethrough**.

5 Categorisation, Summary and Responses to Issues Raised

All 30 valid submissions received by Galway City Council were read and analysed, the following Sections 5.1 thru to 5.3 summarise the submissions, responses and recommendations in changes to the LACAP. The submissions are divided into two sections:

1. Those received from Prescribed and Public Bodies, submission 1 - 5
2. Those received from others, submission 6 - 30

Submissions from Prescribed and Public Bodies

Submission 1

Submission By	Department of Housing, Local Government, and Heritage
Issues Raised	Archaeology and built heritage
Submission Summary	
<p>The submission outlines the following items:</p> <ol style="list-style-type: none"> 1. Identifying the built and archaeological heritage assets in the local authority area including, but not restricted to, structures and sites subject to statutory protection under the National Monuments Acts 1930 to 2014, or the Planning and Development Acts. 2. Including objectives to carry out climate change risk assessments, including condition assessments, for the historic structures and sites in its area. 3. Including objectives to develop disaster-risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area. 4. Including objectives to develop resilience and adaptation strategies for the built and archaeological heritage in its area; 5. Developing the skills capacity within the local authority to address adaptation/mitigation/emergency management issues affecting heritage assets in 	

order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works.

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from Department of Housing, Local Government, and Heritage. In relation to the items raised, Galway City Council responds as follows:

1. Galway City Council is committed to delivering the Galway City Council building register, Action 25, and to implement the Galway City Development Plan, Action 3, cross cutting policies and measures which support and facilitate a just transition to a low carbon and climate resilient society.
2. Galway City Council is committed to carrying out climate risk assessments and updating annually, Action 9.
3. Galway City Council is committed to carrying out climate risk assessments and updating annually, Action 9 coupled with Galway City Council Major Emergency Plan, Action 11.
4. Galway City Council is committed to delivering the Galway City Council building register, Action 25, to carrying out climate risk assessments and updating annually, Action 9, coupled with Galway City Council Major Emergency Plan, Action 11.
5. Galway City Council is committed to implementing heritage Climate Action Regional Office (CARO) and Local Authority Services National Training Group (LASNTG) climate Action training, Action 6.

Recommendation

Amend Action 6: Facilitate Climate Action Regional Office (CARO) and ~~Local Authority Training Group (LATG)~~ Local Authority Services National Training Group (LASNTG) climate action training to elected members and local authority staff to build understanding, knowledge and capacity to deliver on climate actions.

Submission 2

Submission By	Uisce Éireann
Issues Raised	Multiple topics
Submission Summary	
<p>The submission outlines several items under the following headings:</p> <p>1. Impact of Climate Change on water resources and infrastructure:</p> <ul style="list-style-type: none"> • Sustained periods of low rainfall and warm temperature may impact our ability to sustainably abstract and supply water. • Reduced flows in receiving waters due to extended dry periods will reduce the available assimilative capacity for treated wastewater. • More intense rainfall and greater frequency of storm events will result in more frequent flooding due to the capacity of the wastewater network being exceeded and greater environmental impacts from storm water overflows. • It is important that local policy supports and promotes the widespread adoption of blue-green infrastructure in our towns and cities together with innovative nature-based solutions to help ensure climate resilient water services. <p>2. Sustainable Urban Drainage and Integrated Urban Wastewater Management Plans</p> <ol style="list-style-type: none"> a. Widespread adoption of blue-green infrastructure in towns and cities would take pressure off the combined sewer and storm sewer networks, contribute to climate resilience, improve water quality, provide more livable places and also generate capacity for compact growth as set out in the National Planning Framework. b. To maximize the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted by UE. c. The removal of stormwater from combined sewers using Sustainable Urban Drainage Systems and Green-Blue Infrastructure in new 	

developments, and retrofitted in existing developed areas, is strongly encouraged.

- d. We welcome the Council's commitment to "ensure consideration and integration of Nature Based Solutions and Sustainable Urban Design measures in all projects and implemented where appropriate to ensure climate resilience, promoting space for nature, thereby creating vibrant, livable, and sustainable locations".
- e. We would welcome in particular consideration of the following guidance:
 - o Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document
 - o National (Infrastructure) Guidelines and Standards Group recent NGSG Circular 1 of 2023,
 - o DMURS Advice Note 5 Road and Street Drainage using Nature Based Solutions Design
 - o Greening and Nature-based SuDS for Active Travel Schemes - National Transport
 - o Guidance for Urban watercourses by Inland Fisheries Ireland.
 - o the proposed recast Urban Wastewater Treatment Directive (UWWTD). If adopted, the new UWWTD will require collaboration between UÉ and LAs on integrated drainage planning including the preparation of Integrated Urban Wastewater Management Plans (IUWWMPs) which must include both wastewater and urban runoff drainage systems.

3. Water Demand

Uisce Éireann would welcome water use efficiency to be included as an objective/Action in the plan. Having a greater water use efficiency of potable water will help achieve carbon emission targets as well as protect the natural resource in some areas which may be vulnerable.

4. Energy Efficiency

Uisce Éireann welcome the opportunity to explore potential collaboration in relation to district heating where heat recovery from the wastewater network and

wastewater treatment plants could potentially become a heat source for district heating.

5. Circularity & Bioeconomy

Uisce Éireann consider advanced anaerobic digestion followed by reuse of the residual biosolids on land to be the most sustainable solution for wastewater sludge treatment and disposal. Uisce Éireann are eager to collaborate with others in leveraging circularity opportunities to support the development of a sustainable bioeconomy model.

6. Potential impacts on UE Water Sources & infrastructure

We request that any development associated with the climate action plan including e.g. renewable energy have due regard for, and not adversely impact, existing, planned or reasonably foreseeable water sources or Uisce Éireann infrastructure. Uisce Éireann will engage via the planning process for such developments in its role as statutory consultee.

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from Uisce Éireann and responds to the items raised as below:

1. Comments noted.
2. Comments noted, refer to Action 3 implementation of Galway City Development Plan, Action 23 for the Greater Galway Strategic Drainage Study (GGSDS), Action 42 outlines commitment to explore potential for integrating Nature Based Solutions (NBS) on all internal projects and Action 41 refers to the development of a City Blueway Strategy.
3. Comments noted, refer to Action 27, 30 and 46.
4. Comments noted, Action 8 outlines Galway City Councils commitment to developing an energy master plan for the city.
5. Comments noted, refer to Action 8, 27, 58, 60.
6. Comments noted.

Recommendation:

No change to draft plan.

Submission 3

Submission By	Department of Agriculture Food and The Marine National Seafood Centre
Issues Raised	Submission in response to the SEA Scoping report on Council Climate Action Plan
Submission Summary	
<ol style="list-style-type: none"> 1. Ireland's seafood industry (fishing and aquaculture) is one of the key stakeholders operating in the marine area and plays a vital role in the sustainability of our coastal communities. Over 15,000 people are employed around our coast both directly and indirectly. Many of these communities have very limited alternative employment and economic activity options. It is therefore essential that the socio-economic reliance on the seafood sector is fully recognised and is factored into any Climate Change Action plan. Fishing and food security is a key part of Government Policy. Food Vision 2030 recognises and values the role of primary food producers. 2. The Seafood industry is experiencing a period of difficult change, arising from the ongoing consequences of the EU UK Trade and Co-operation agreement which are specific and impactful on Ireland's seafood sector. There is now ever-increasing demand on the marine space from Offshore Renewable Energy (ORE), Marine Spatial Planning, Marine Protected Areas (MPAs), and other environmental measures. 3. Our coastal communities and maritime sectors will continue to play a significant role in contributing to our climate goals and will continue to be 	

consulted and supported in the transition to carbon neutrality. The seafood industry, through both the Sectoral Adaptation Plan ([Agriculture, Forest and Seafood Climate Change Sectoral Adaptation Plan](#)) and the annual Climate Action Plan ([CAP23](#)) continue to support initiatives to improve understanding of our marine area and ensure sustainable resource use, including through bio and circular economy initiatives. These plans require consideration in the SEA process.

4. Also for consideration in the SEA process is the European Commission's Communication on the energy transition of the fisheries and aquaculture sector as part of its Fisheries Policy Package. This proposes the establishment of an Energy Transition Partnership (ETP) to develop a roadmap for the energy transition of the sector towards climate neutrality by 2050. The roadmap will set out investment needs, sector initiatives and inform policy decisions to help achieve this transition. The ETP is a multi-stakeholder platform intended to promote co-operation, knowledge sharing and dialogue between private and public stakeholders in order to accelerate the energy transition in the fisheries and aquaculture sector. This Partnership will help to shape the development of future transitional Actions for Ireland's seafood sector.
5. Local authorities should include relevant steps to support a Just Transition for the sea fisheries and aquaculture sectors in their Climate Action Plans.

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from DAFM National Seafood Centre, in relation to the items raised, below are our responses:

1. Comments noted
2. Comments noted
3. Comments noted
4. Comments noted

5. Comments noted, refer to Action 27 relating to working in partnership with local community and business groups to support climate Action and just transition.

Recommendation

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

Submission 4

Submission By	Department of Agriculture Food and The Marine
Issues Raised	Agriculture
Submission Summary	
<p>In relation to adaptation and the potential effects of climate change on Agriculture, there are a number of measures that can be applied to build resilience, many of which can also have benefits from a mitigation perspective:</p> <ol style="list-style-type: none"> 1. Maintaining a fodder reserve on farm can address the effects of longer and wetter winters as well as poorer weather conditions in spring at the start of the grazing season. The Teagasc advisory service and private Agricultural Consultants are available to provide the appropriate advice to farmers. Diversification in agricultural systems will increase resilience of farms to climate change and reduce the economic risk. 2. Creating further resources to harbour and restore biodiversity improve resilience to climate change. The planting of trees and forestry can contribute to carbon 	

sequestration, and biodiversity by providing a more diverse ecosystem to build resilience. Improvements in soil structure, management and health by increasing soil organic carbon will enhance water holding capacity beneficial for drought conditions as well as high rainfall events. Peatland restoration will also improve water holding capacity as well as water quality.

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

The submission outlines DAFM request that the following policies, strategies and measures be taken into consideration to ensure that Ireland's reduction targets for agriculture and land use are fully supported.

- DAFM Forest Strategy
- Origin Green Programme
- National Biomethane Strategy

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from the Department of Agriculture Food and The Marine. In relation to the items raised, Galway City Council has noted the items raised and will consider such in the implementation of Actions outlined within the LACAP, particularly Action 1 and 4.

1. Comments noted, refer to Action 27 relating to working in partnership with local community and business groups to support climate Action and just transition.

2. Comments noted, refer to Action 42 pertaining to nature-based solutions, 34 Green Space Strategy, Action 35 relating to Galway City Biodiversity Action Plan, Action 37 Tree Strategy.

3. Comments noted, refer to Action 4 knowledge sharing, Action 35 relating to Galway City Biodiversity Action Plan.

Recommendation

No change to the draft plan.

Submission 5

Submission By	EPA
Issues Raised	Multiple topics
Submission Summary	
<p>The EPA acknowledge the preparation of the Plan, which aligns with national climate change policy commitments, and which sets out Actions to be taken by Local Authority, in collaboration with other key stakeholders, over the next five years.</p> <p>1. Monitoring</p> <ul style="list-style-type: none"> a) Local Authorities need to ensure that there are sufficient suitable monitoring networks (that are maintained and producing high quality data at an appropriate resolution and frequency, to allow decision makers to make decisions on how to adapt. This could be flood defence related, making arrangements with respect to water resources, bathing water or issuing health warnings relating to hot weather, air particulates etc. b) Climate adaptation involves being able to make decisions when the climate effects are magnified. Local Authorities have a direct role in this with respect to water and air. Consider including a commitment to ensure that monitoring arrangements remain fit for purpose, such that that the data generated from monitoring, can be used by decision makers such as Local Authority emergency planning teams or Met Éireann flood forecasting teams. This could also be applicable to any future drought forecasting teams or for air pollution forecasting teams. c) Related to this, the monitoring data gathered provides validation of the climate change modelled projections, allowing future planning to bolster 	

flood defence or have more adaptive water supplies in response to climate change.

- d) Galway City Council should consider taking into account the EPA's 'Climate Change in the Irish Mind' project in finalising the Plan. This research is part of the National Dialogue on Climate Action.
- e) The EPA suggest that the Plan include a specific Action to carry out "implementation monitoring" to ensure that progress achieving the Actions and measures across the Plan is being monitored and reported on.

2. SEA/AA

- a) The SEA should also assist in identifying ways to maximise the potential co-benefits of climate-related measures for air quality, human health, biodiversity, water quality and other interrelated areas (i.e. win-win solutions).
- b) We recommend that the findings of the SEA Environmental Report and NIS are fully reflected in the Plan, to ensure that the relevant recommendations are fully considered and integrated as appropriate.
- c) Environmental Authorities under the SEA Regulations, you should consult with:
 - o Environmental Protection Agency;
 - o Minister for Housing, Local Government and Heritage;
 - o Minister for Environment, Climate and Communications;
 - o Minister for Agriculture, Food and the Marine.

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from the EPA, in relation to the items raised, below are our responses:

1. Comments noted, the monitoring and reporting requirements for the climate Action Plan have been outlined in Section 5. Galway City Council is committed to striving towards climate resiliency through the EU Missions on Adaptation to

Climate Change, Action 10. Galway City Council is committed to delivering the Galway City Flood Relief Scheme, Action 33. Galway City Council conduct bathing water sampling in line with obligations under relevant regulations. Galway City Councils Major Emergency Response Plans include provision for issuing public alerts, Action 11. Galway City Council is committed to developing an Air Quality Improvement Plan for Galway City, Action 43, and will continue to work with the EPA in the operation and maintenance of the air quality monitoring network and the "Air We Share" programme in Galway City. Galway City Council will consider the EPA's 'Climate Change in the Irish Mind' project through Actions 1, 2, 4, 16, 17.

2. Comments noted.

Recommendation:

No change to draft plan.

Submission from others

Submission 6

Submission By	Marie Hanna Curran
Issues Raised	Multiple topics
Submission Summary	
<p>The submission outlines suggestions for further Action in the following areas:</p> <p>1. Policy/ Auditing</p> <p>The submission would like to see more checks and balances in place regarding the progress of the plan. For example, a) what counts as the parameters for success at varying intervals e.g one year, two years etc, b) What is the exact aim at year 1, year 2 etc? And c) who is the individual responsible for auditing and reporting on the plans progress?</p> <p>2. Private Housing</p> <p>The submission would like to see exact targets for one year into the plan, two years in etc, only vague percentages at long intervals regarding retrofits and the</p>	

reduction of energy use and carbon emissions. What is the parameter for success at year 1, year 2, etc and a) How exactly is this going to be achieved? and b) Who is the individual responsible for auditing this process and reporting upon it, on an ongoing basis?

3. Social Housing

The submission seeks exact targets for one year into the plan, two years in etc, only vague percentages at long intervals regarding retrofits and the reduction of energy use and carbon emissions. What is the parameter for success at one year, two years etc and a) How is this going to be achieved? and b) Who is the individual responsible for auditing this process and reporting upon it, on an ongoing basis?

Fossil fuels should be eliminated as quickly as possible from social housing and insulation updated equally as quickly. a) Has this been put out to tender? b) Who is responsible for auditing and reporting on the process? and c) What is the target measure for success?

4. Transport

The submissions seeks exact targets. How many EV buses can we expect to see at year 1? 2 years? Who is the individual responsible for assessing and reporting upon the move to carbon free public transport?

Where are the extra cycleways going to be placed? Are natural materials going to be used in paving, streetscapes, roads? And how exactly are cyclists and walkers going to be prioritised over other road users? Who is the individual responsible for overseeing this and reporting and auditing its successful implementation? What constitutes as success?

5. Trees and Amenities

The submission seeks to understand how will smaller green spaces be linked up? Is there any aim to create a large urban forest throughout the city and beyond, ie linking up Barna woods to Terryland to Merlin via cyclways and walkways? How exactly will pedestrians and cyclists be placed ahead of cars and separating cyclists from car users via trees/shrubs. Who is the individual responsible for

overseeing the implementation of added green spaces, trees etc and what is the goal regarding deemed success? What is the aim at 6 months, one year, etc?

What measures will be implemented to slow traffic down and decrease the volume of traffic through the city?

Will pedestrian only areas or at least safer areas where cars have to put pedestrians first be to the forefront of decision making regarding traffic movement?

Will the council engage with the NCBI regarding accessibility to all areas of the city?

Will there be a focus on Creating city greenways, (take a look at the forest trail in the city of Fuzhou, aspirational but could be done on smaller scale via city greenways?

6. Future risks regarding climatic events:

Regarding ongoing flood threats, will rain gardens be implemented to improve drainage?

Regarding the use of flood defences, will nature-based solutions be chosen over grey infrastructure? Who is responsible for auditing this process and reporting upon it, on an ongoing basis? What is the deemed parameter for success?

Will single use plastics be banned from all public areas?

7. Communication

What industries have so far expressed their interest in the plan? How are they set to amend their practices and what parameters have been set regarding what will be classed as success? Who is the individual responsible for auditing and reporting upon this process?

8. Financing

Is there an aim to use technology to aid the funding of this project? Take GCash (in partnership with WWF) in the Philippines for example, Filipino's use this money app and instead of the granting of coupons are directed instead to fund the planting of trees within the Philippines. Is there any plan to interact with

businesses and eg An Taisce, where Galwegians can obtain a coupon/token after so many purchases which can then be used to fund trees/maintenance?

9. Communities

What specific community groups have been identified as integral to the process and who is going to liaise with them on an ongoing basis through the project? Have schools, Tidy towns etc been identified as stakeholders in the process?

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from Malena. Then, in relation to the items raised, below are Galway City Council's responses.

1. Policy/ Auditing

Section 5.3 outlines monitoring and reporting requirements for the LACAP.

2. Private Housing

Section 1.3 outlines the role of the Local Authority in influencing, coordinating, facilitating, and advocating for climate Action in areas outside of direct accountability. Private residential Action is an example of this, Galway City Council is committed to pursuing funding to support climate Action initiatives, Actions 4, 5 and Action 27 to work alongside the community in delivering the LACAP Actions. Furthermore, Galway City Council has endeavoured to seek support for private housing climate Action, one such example of this being the award of a pilot city as part of the NetZeroCities programme, Action 31. Section 5.3 outlines monitoring and reporting requirements for the LACAP.

3. Social Housing

Galway City Council is committed to delivering the social housing retrofit programme annually as stated in Action 26. Progress on all Actions will be evident on the publicly accessible website to be developed under Action 16. Section 5.3 outlines monitoring and reporting requirements for the LACAP.

4. Transport

Galway City Council is committed to the delivery of the Galway Transport Strategy along with completion of the current Galway Metropolitan Area Transport Strategy, refer to Actions 47, 48, 49, 50. Action 47 KPI will include count and brief summary of projects delivered annually, for example number of cycling and pedestrian interventions delivered, coupled with annual reporting on delivery progress of the Galway Transport Strategy and comparison of intercensal data in relation to walking or wheeling, cycling, and use of public transport.

5. Trees and Amenities

Actions 34, 35, 37 and 38 outline Galway City Councils commitment to delivering strategic plans in the areas of trees, biodiversity and amenity.

6. Future risks regarding climatic events

Galway City Council is committed to exploring the potential for Nature Based Solutions in all internal and GCC permitted projects, Action 42. Galway city Council is committed to supporting waste reduction and promoting circular economy principles throughout the city, refer to Action 58 and 60.

7. Communication

Galway City Council is committed to engaging with all industry stakeholders within the administrative area as part of the implementation of this LACAP, refer to Action 3, 8, 15, 17, 19 and 27. Section 5.3 outlines monitoring and reporting requirements for the LACAP.

8. Financing

Galway City Council is committed to pursuing suitable scale financing methods to support the delivery of this plan including local, national and EU funding, refer to Action 5. Furthermore, Galway City Council has endeavoured to seek support for private housing climate Action, one such example of this being the award of a pilot city as part of the NetZeroCities programme, Action 31. Section 5.3 outlines monitoring and reporting requirements for the LACAP.

9. Communities

Galway City Council is committed to engaging with all community groups as part of the implementation of this LACAP, refer to Action 15, 19 and 27.

Recommendation

Amend Action 47 KPI to: Number of projects completed annually **include count and brief summary of projects delivered, for example number of cycling and pedestrian interventions delivered, coupled with annual reporting on delivery progress of the Galway Transport Strategy and compare intercensal data in relation to walking or wheeling, cycling, and use of public transport.**

Submission 7

Submission By	Hinterland
Issues Raised	Enhancing Galway City's Climate Action Plan through Comprehensive Food and Agriculture Transformation
Submission Summary	
<p>The submission outlines several items under the following headings:</p> <p>1. Public Procurement and Local Food Initiatives</p> <p>Galway has a unique opportunity to promote sustainability through public procurement practices, particularly in educational institutions. Introducing a mandate for the procurement of locally sourced food in the public sphere, i.e.: Civic offices, schools and colleges, etc not only supports local farmers but also reduces the carbon footprint associated with transportation. Additionally, the establishment of a Food Policy Council within the Council can provide a structured platform for collaborative decision-making, ensuring diverse perspectives are considered in shaping food-related policies</p> <p>2. Short Supply Chains and Support for Local Producers</p> <p>Acknowledging the dominance of supermarkets in Galway's food distribution, it is crucial to reinvigorate small family-run businesses. The Climate Action Plan should actively encourage the development of short supply chains, providing easier routes to market for local farmers and producers. This can be achieved through targeted</p>	

initiatives that incentivise collaboration between producers and retailers, ultimately diversifying the sources of food for consumers.

3. Addressing the Dominance of Supermarkets

The challenge posed by the concentration of food distribution in supermarkets requires careful consideration. As small, family-run businesses face closures, and the local weekly food market operates only one day a week, there is an urgent need to explore ways to create a more balanced and resilient local food economy. Initiatives supporting the establishment of urban agriculture, such as communal composting schemes and community allotments, can contribute significantly to diversifying the sources of fresh produce.

4. Galway as a Pioneer in Sustainable Food Practices

Given Galway's relatively small size and easy access to farmland, the city is well-positioned to pioneer innovative and sustainable food practices. Short supply chains are not only feasible but can be effectively implemented to showcase Galway as an exemplar for other cities. While there may be resistance from supermarkets and other lobby groups, proactive engagement and inclusion of all stakeholders in the proposal development process can foster a collaborative approach to overcome challenges and pave the way for positive change.

5. Inclusion of Food in Climate Action Plan

It is noteworthy that the initial draft of the Local Authority Climate Action Plan does not explicitly address the crucial aspect of food and its impact on sustainability. To rectify this oversight, especially in light of forthcoming EU legislation SFS (The Sustainable Food System Framework) it is imperative to integrate specific goals related to food system transformation. This includes provisions for supporting urban agriculture, advocating for communal composting, and promoting local, sustainable food production within the broader context of the CAP.

In conclusion, by explicitly incorporating initiatives related to food and agriculture in the Climate Action Plan, Galway can not only meet its national emission reduction targets but also emerge as a trailblazer in sustainable and resilient urban planning. Shaping a future where Galway thrives as a model for environmental sustainability and community resilience.

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from Hinterland, in relation to the items raised, Galway City Council's responses are as below:

1. Public Procurement and Local Food Initiatives

Galway City Council is committed to implementing climate positive requirements and life-cycle costing to all Galway City Council procurement processes, refer to Action 5.

2. Short Supply Chains and Support for Local Producers

Galway City Council is committed to supporting local food production, refer to Actions 27 and 40.

3. Addressing the Dominance of Supermarkets

Galway City Council is committed to supporting local food production, community allotments and green waste management for public use, refer to Actions 27 and 40.

4. Galway as a Pioneer in Sustainable Food Practices

Galway City Council is committed to positioning itself as a lead local authority in Ireland on Climate Action which includes sustainable food practices, refer to Action 10, 15, 17, 27, 40, 58 and 60.

5. Inclusion of Food in Climate Action Plan

Galway City Council has included targeted Actions to address food sustainability within this climate Action plan, Action 27 and 40. Furthermore, Galway City Council is committed to engaging with stakeholders on climate Action initiatives during the lifetime of this plan, Action 4 and 15.

Recommendation

No change to the draft plan.

Submission 8

Submission By	Community Gardens Ireland
Issues Raised	Support for allotments and community gardens
Submission Summary	
<p>The Community Gardens Ireland submission welcomes the inclusion of Action 40 in the Galway City Council Climate Action Plan and recommends the following:</p> <ol style="list-style-type: none"> 1. Galway City Council should commit to supporting, promoting and increasing the number of allotments and community gardens provided over the lifetime of the Climate Action Plan. The KPI for this will be the number of allotments and community gardens in Galway City Council. 2. Galway City Council to commit to performing a review of idle, vacant and derelict land within Galway City Council that could be used for community growing purposes. 3. Galway City Council to commit to executing a survey of local residents throughout the county asking if they are interested in an allotment or a community garden close to them, similar to that executed by Kildare County Council in previous months: https://consult.kildarecoco.ie/en/content/would-you-allotment-near-you 4. Galway City Council to recognise National Allotments and Community Gardens Week by celebrating the role of community growing within communities throughout Galway City Council during this week each year. 	
CE Response and Recommendation	
<p>Response</p> <p>Galway City Council acknowledges and welcomes this submission from Community Gardens Ireland. In response to the items raised:</p> <ol style="list-style-type: none"> 1. Galway City Council should commit to supporting, promoting, and increasing the number of allotments and community gardens provided over the lifetime of the Climate Action Plan, Action 40. 	

2. Galway City Council intend to launch the Galway City Green Space Strategy in 2024, Action 34.
3. Galway City Council are committed to supporting, promoting, and increasing the number of allotments and community gardens provided over the lifetime of the Climate Action Plan, Action 40.
4. Galway City Council is committed to completing a range of community climate Action events across a range measures, Action 27.

Recommendation

No change to the draft plan.

Submission 9

Submission By	Louie Maguire
Issues Raised	Bad Smoke and fumes in the Galway city area
Submission Summary	
<p>The submission outlines concerns with the following items:</p> <p>1. Bad smoke coming from houses</p> <p>The submission outlines difficulty to breathe due to bad smoke coming from houses in my local area. I would suggest stricter rules on burning inappropriate fuel is enforced.</p> <p>2. Car exhausts</p> <p>There is always a car with thick black smoke coming from its exhausts. But there are hundreds of cars driving in Galway that their exhausts are not properly working. The smell and choking fumes are terrible. It is a fact that three times more deaths occur from car fumes than car accidents. Can I report to the Garda the car registration numbers? This is getting out of hand. Older cars are particularly to blame.</p> <p>3. E-car charging</p>	

City council does not allow its housing tenants to install a cheaper more effective charging point at their homes. I think it basically comes down to the fact that the space outside the tenants houses is not owned by the tenant. The space is therefore for general use. My point is that you don't need to have ownership of this space. A licencing agreement could easily be used to suit both the tenant and the city council. It is fast approaching where electric cars be the only cars used on the roads. We have got to get this right. We have to meet our climate targets.

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from Louie Maguire. In relation to the items raised, Galway City Council's responses are as follows:

1. Whereby the submitter experiences excessive smoke coming from houses, this should be notified to the Customer Services Department of Galway City Council which will be investigated further to ensure compliance under the Air Pollution Act, 1987 and the Air Pollution Act (Marketing, Sale, Distribution and Burning of Specified Fuels) Regulations, 2012.
2. All vehicles within Galway City are required to comply with the national testing requirements of the National Car Testing Service (NCTS) or the Commercial Vehicle Roadworthiness Testing (CVRT) both of which are enforced by An Garda Síochána.
3. Galway City Council is committed to publishing the Electric Vehicles Charging Strategy by Q2 2024.

Recommendation

No change to the draft plan.

Submission 10

Submission By	Kinvara Climate Action
Issues Raised	Multiple topics
Submission Summary	
<p>The submission outlines several items under the following headings, the submission recognises the Local Authority has an extremely important role in helping the people of Galway City to transition to a green and climate resilient economy.</p> <ol style="list-style-type: none"> 1. Governance and Leadership: Staff awareness and training within the Local Authority is imperative and should be mandatory. Climate change is extremely urgent. Without massive system change we cannot hope to achieve our targets and build a safe future for our children. Our local leaders need to be aware of that. This is in line with Theme 6, section 3.2.1 of the LACAP. We can no longer afford business as usual and our local leaders need to know that there will be strong resistance to policies that take us in the wrong direction. 2. Roll out a public awareness campaign including information on the science of Climate Change, Ecosystems understanding and explain why green policies are imperative. 3. Empowering people with an educational program that is inclusive is fundamental. People need to know the steps to take to transition individually and collectively to a regenerative, zero emissions, economy and environment. 5. "Permaculture is a design system for creating sustainable and resilient communities and environments. It offers practical tools for generating productive and efficient landscapes as well as organisations and social structures. The discipline originated as an ecological method for designing sustainable full-featured human settlements, more recently the design principles have been applied in urban, social and group contexts to organise, communicate and cooperate more effectively, rethinking – we call this "social permaculture"- Alfred 	

Decker. Social permaculture is about relationships and connection and creating the regenerative conditions between people and place for humans to flourish. Promote Permaculture principles and designs within Council operations and offer training on these principles to communities.

6. Consider the uncertainties and risks around Tipping points and feedback loops when educating people about Climate Change. Tipping points are extremely important concepts to understand due to their capacity to massively amplify and accelerate climate breakdown. Mention Tipping points in the LACAP risk assessment. Scientists now believe that there are 5 tipping points which could be activated within the Paris Agreement targets of 1.5 or 2C. Consider the exponential nature of climate change, and the escalation of extreme weather events across the world with disastrous consequences for communities. Climate change is escalating and accelerating. Discuss the ramifications of this science within the LACAP. Knowledge of the science is critical as it highlights the urgency for decision makers.

7. The Local Authority should promote diets and lifestyles that have lower carbon footprints. With this in mind both active travel and local sourced plant based diets should be promoted.

8. The changing climate is already impacting harvests across the world. This is only going to get worse as the climate crisis escalates. Diversification of agriculture in Ireland and in Galway could help insulate Irish citizens from food system shocks abroad. Although the City Council does not include large areas of Agricultural land this is an issue that will affect the citizens of Galway City. This is especially important given that Ireland is a net importer of calories, and that we have a monoculture of Meat and Dairy. Irish Agriculture is focused on the Export Market, with almost 80/90% of dairy produce exported. Mention Food Security and the risks associated with food insecurity in the risk assessment section of the LACAP.

9. All public catering events at Local Authority level should promote local organic where possible, plant based diets, and all catering should be meat free. This would be in line with Theme 7, section 3.2.1 on Green Public Procurement (in the

LACAP). This would be an important way for the Local Authority to lead by example.

10. Energy and Built Environment: Do not develop facilities such as data centres within Galway City Council's jurisdiction. These are extremely energy intensive and will cause us to miss our energy targets/budgets. With industry accounting for approximately ¼ of emissions in the city, consider the nature of developments going forward. Do not approve other energy intensive infrastructure that will cause the local authority to miss carbon budgets and targets if it is not essential to the lives and livelihoods of the people.

11. Galway City Council can endorse the Fossil Fuel Non-proliferation Treaty and be part of a movement that puts pressure on the central government to also sign the Treaty. These are important leadership steps, which could make the Local Authority a climate leader. 100 cities and local governments across the world have already endorsed the Treaty.

12. Support and encourage the development of local energy co-ops to enable and facilitate communities to develop skills and capacity to initiate locally based community owned and community led energy solutions, including the option of the coop use of public land for the generation of renewable energy alongside supporting community ownership of local microgeneration projects and the new energy grid capacity developments coming on stream. Roof top solar could be a gamechanger in the city given the number of available roof spaces in the urban environment.

13. Building and Planning Regulations: Initiate and support One Planet Living developments and community innovation projects such as is supported in Wales by the The One Planet Council. This forward-thinking planning policy provides a genuinely affordable and sustainable way for people to live and work on their own land, bringing social, economic and environmental benefits. It was adopted by the Welsh government in 2011 as part of its One Wales: One Planet scheme. One Planet Development is quantified by ecological footprinting, which reveals how much of the Earth's resources people are consuming. When households reduce their own ecological footprints this helps their country reduce its overall footprint.

The One Planet Council provides a bridge between applicants and local planning authorities, with guidance and tools to support anyone making the transition to this more sustainable way of life. It works also with those who have already made that leap, and with policymakers, academics and landowners. The aim of the One Planet Council is to enable a broad range of exemplar One Planet Development projects throughout Cymru/Wales, comprised of people from all walks of life. And to see these sites serve as an inspiration to the people of Wales and beyond.

14. Communities, Resiliency and Transition On the Climate Action Fund Theme 32, the fund is not sufficient to allow Galway to transition to a green Economy, this shows a lack of ambition of central government. It is very important to strengthen local authorities to allow them to take more Action independently of the central government. A lot of community groups struggle with access to land; this is often the main barrier to community group projects, specifically projects related to the environment. The fund does not address this issue.

15. Galway City Council should immediately publicise an up to date audit of all public land and empty buildings, and make it accessible and visible to local communities, and allocate to communities to facilitate social enterprises and Green Transition Cooperative Projects, such as Food and Fuel production, community repair cafes, library of things etc

16. Environment and Biodiversity Adopt a Rights of Nature Motion within the City Council. Rights of Nature is a concept, or way of thinking, about how we can redefine our relationship with the natural world. By building on this relationship with reciprocity and care we can learn (or remember) how to live in harmony with nature. There are different spheres in which this can be done - from education and engagement at community level, to changes in local laws, policy and planning. This would be a key way to build environmental protection into all decision making and raise awareness about the Nature/biodiversity crisis that we are facing. This would educate people and give recognition to the inherent rights of our natural ecosystems to flourish and thrive, to not be destroyed, damaged or polluted and of our inherent interdependence on healthy ecosystems in order to survive.

17. Carry out an Ecological audit of Local Authority land, protect areas of high value and work with the community to provide allotments and community growing areas. Try to speed up access to allotments, people are currently waiting years for these spaces.

Work closely with and be open to listening to and learning from community groups who are already doing important environmental work on the ground.

Work to support best practice management of hedgerows and woodland in the city, limit unnecessary cutting of these vital habitats.

Plant more trees and native hedgerows on all publically owned land and sites! Continue to support wild zones and wild flower meadows, by appropriate mowing regimes, trees and pollinator friendly planting schemes. Use perennial pollinator plants as these are cost efficient and more resilient to environmental stresses. Trees in the city regulate temperatures during heat waves and soak up water during wet conditions, trees can be a powerful tool for climate adaptation. Trees also provide important wildlife corridors and commuter routes for urban wildlife.

Utilise best practice across all public spaces, educating council staff and all community bodies on regenerative and permaculture practices, sustainable woodland management and nature based solutions in the care and maintenance of the Public Authority.

18. Introduce a pesticide ban in the City. In theme 45, plan to educate people about acceptance of natural areas that are not strictly 'tidy'. Areas such as parks and green areas do not need to be so highly manicured. In many places pesticides are used completely unnecessarily. Pesticides are very harmful and are known to be carcinogenic, we must phase out these chemicals entirely.

19. Support Regenerative Bioregional Multi Stakeholder Landscape Partnership Projects Galway City Council should have Nature Based Solutions (NBS) at the forefront of their adaptation and mitigation strategies for flooding and other climate driven risks (Theme 42). The City and County Councils should work alongside the Climate Action Regional Office in this regard. NBS are "*Solutions that are inspired and supported by nature, which are cost-effective, simultaneously provide*

environmental, social and economic benefits and help build resilience". Some of the best NBS are derived from natural vegetation, such as planting more trees in the landscape, which can help prevent river and coastal flooding, drought and other climate driven catastrophic events alongside benefits of carbon sequestration. The River Corrib catchment should be examined to identify NBS to flooding. Catchment based solutions should be examined for flood defence, including slowing water flow in catchments and developing wetland storage sites, Ponds, SUDS etc. Farmers and Landowners should be involved and compensated for lost livelihoods. NBS are win-win as there are co-benefit for habitats and species alongside supporting carbon storage and sequestration. These projects should also be considered because they largely dispense with hard engineering carbon heavy concrete and steel reinforcement. The cement industry is a huge emitter of carbon dioxide. Concrete causes damage to the most fertile layer of the earth, the topsoil. The most severe impact of concrete is that it destroys natural infrastructure without replacing the ecological functions that humanity depends on. Successful Galway City projects such as the Salthill Sand Dune Project should be proliferated. Galway City is using NBS to mitigate coastal flooding in Salthill, see the link below.

Oceans, kelp banks, trees, algae and wetlands have performed as carbon sinks for millions of years. Using NBS increases the opportunity for carbon sequestration.

NBS should be used to mitigate coastal flooding: NBS intentionally use natural and nature-based habitats, such as marshes or human-made reefs, and natural processes, such as river currents, in infrastructure projects to reduce coastal hazard risks and deliver multiple economic, social, and environmental benefits. These systems are self organising, eg. stream systems which slow sea currents down so that it deposits sediment, reducing wave power.

A large proportion of Galway's population live and work near the coast, often in homes and businesses built on floodplains. Nature based solutions can have a very important role in protecting lives and livelihoods as well as homes and businesses along the coast. Several areas within the city are already experiencing significant impacts in this regard. Support more research on Marine Permaculture

projects such as “With kelp’s help, marine ‘permaculture’ (farming in a sustainable and self-sufficient way) has the potential to turn not only the ocean round but the whole planet – because once we grow it at scale, kelp gives with one hand (food, feed, fuel, fertiliser and more) and takes with the other (carbon, out of the atmosphere and upper ocean, storing it safely in the middle and deep ocean for thousands of years).

Support more research on Marine Permaculture projects such as “With kelp’s help, marine ‘permaculture’ (farming in a sustainable and self-sufficient way) has the potential to turn not only the ocean round but the whole planet – because once we grow it at scale, kelp gives with one hand (food, feed, fuel, fertiliser and more) and takes with the other (carbon, out of the atmosphere and upper ocean, storing it safely in the middle and deep ocean for thousands of years).

River Flooding NBS should be put into practise. There are many examples of river restoration upstream reducing downstream flooding. All public owned lands near a river basin should where possible be protected and planted with native riparian woodland, Galway City Council should work with the Galway County Council on these projects.

Natural catchment protection measures can be an effective tool for flood prevention. Pontbren in Wales, Pickering in Yorkshire and many other areas have led the way in this area and reduced catastrophic flooding at a much lower price than hard engineered concrete based solutions.

Professor John Sweeney Climate Scientist based in Maynooth University stated “Given that we are in a climate emergency...more radical options merit consideration. In the Netherlands, for example, a country facing even more acute problems of flooding than Ireland, a programme designed to work closer to nature has proven successful. “Room for the River” has sought to alleviate floods by better managing flood plains, creating water buffers and constructing flood bypasses. Working with nature rather than seeking to control it, offers opportunities. How much less expensive for the taxpayer would it be for example to pay agricultural landowners upstream to allow occasional flooding of their land that would protect homes and businesses downstream? Galway City should work with Galway County on these cross-jurisdiction challenges.

20.Transport and Mobility, one of the most obvious areas where the local Authority can show leadership in the transition to a climate resilient economy is in the area of Transport. Transport is the third largest source of emissions for Galway City. Councillor leadership especially in the area of planning could have a massive effect on those emissions both positively or negatively.

We support your Low emission zones pilot scheme as outlined in Theme 43. This area could prioritise pedestrians, active travel and public transport. Active travel has the potential to solve Galways traffic problems. Proactive policies in Paris have resulted in a 45% reduction of driving within Paris city limits since the early 1990s, while public transport use has risen by 30% and cycle use by about 1,000%. We can make this happen in Galway too.

Create safe cycling and walking infrastructure- safe routes to schools for all children. Adopt best practice when designing cycling and walking infrastructure, take your lead from countries that have well developed cycling infrastructure. Build networks of cycle paths to make cycling a true and safe alternative to driving (Themes 47 and 48). Follow the hierarchy of transport when allocating road space.

Prioritise walking and cycling infrastructure above roads and fast track those projects

Connect cycleways with other public transport such as buses and train stations and provide adequate parking for bikes.

Do not build the ring road, the emissions cost would be enormous and it will lock us into increasing emissions. Use the money to transform Galway and make it a city where active travel and public transport is the easiest way to get around.

Discourage the use of SUVs in built up areas. These cars are known to have higher emissions associated with them and they take up more space.

Seriously consider a light rail or Luas style system for Galway as in Theme 48

Make neighbourhoods more permeable allow more pedestrian movement through spaces so people can access areas without using cars

Pedestrianisation of areas within the city with 30kmph speed limits and French style crossings that are red for cars by default

Support sustainable, community led walking & cycling buses

Ensure safe pedestrian and cycle access to all train stations and bus stops

Covered, safe, protected bus shelters in all locations with a regular service

Pull in areas at the side of road for buses to stop safely and allow traffic past on the right hand side.

Take note of the maps below showing barriers to active travel within the city. Take immediate steps to remedy these low hanging fruit. Kissing Gates are huge obstacles for bikes, wheelchairs, pushchairs and buggies and should be removed as a matter of urgency. Galway citizens have been calling for the removal for too long, we need a more responsive local Authority that can respond on the ground to these issues.

21. Sustainability and Resource Management, prioritise reduce and reuse strategies rather than recycling which has limited value and can in fact be detrimental by locking in continued use of single use plastic.

Promote water refill stations as in Theme 30, roll out these stations across the city and do it as a matter of urgency. It shouldn't take 5 years. Promote reusable keep cups in general and within city council facilities. Promote libraries of stuff to allow people to share items such as gardening tools and equipment. Work with shops to promote refill stations and to reduce plastic packaging. Set targets on reduction of plastic waste streams for businesses in Galway. Support Co-Operatives. Co-ops can help us to meet local production needs for fuel, food, energy, clothing, packaging, eco-housing etc. Co-ops also support small farmers and businesses and make the food system more resilient. Only support the development of new businesses that are regenerative and non-extractive

22. Climate and food security, The Draft LACAP does not mention food security. We would like the LACAP to explicitly state what food insecurity looks like, perhaps this could form part of the risk assessment. Food security is an indirect impact of the extreme weather outlined in the LACAP report. Include food security in Figure 1-2, as part of the spectrum of Climate Impacts and Hazards.

Climate shocks in the breadbaskets of the world and producers of fruit and veg, such as Spain could have serious repercussions for Ireland. The local authority should make public land and buildings available to house local community food hubs, co-ops and community supported agriculture projects to re-create local food policy and systems to support local food consumption as a matter of urgency. The Council should promote projects that support Urban agriculture and community supported partnerships with farmers and producers outside of the city for growing food and for community agricultural projects.

The local authority should promote diversification of farming and should promote local organic production on lands within the city boundary. Policies that encourage communities to grow food like community gardens should be supported and public Edible Landscaping projects initiated around the city.

Sweet Water Foundation is an amazing city arts and farming programme in Chicago, which uses a blend of agriculture, art, carpentry, design and education to transform vacant spaces and abandoned buildings into economically and ecologically productive and sustainable community assets. The project produces engaged youth, skilled workers, art, locally grown food and affordable housing. Projects such as this can be replicated and adapted for a Galway setting. A concept known as 'Re-mapping the Publics' is discussed in the booklet below.

"This offers a blueprint for re-mapping our cities resources to create true common wealth. The spaces, structures, networks, resources and opportunities to mend the urban fabric, healing communities and equipping our neighbourhoods to thrive rather than merely survive".

Galway City Council should support and develop in partnership with local stakeholders a Local Food Policy which is essentially about putting food back into our local Communities. We want everyone in Galway to have access to affordable, locally produced, nutrient dense, chemical-free food. Both Galway's Councils should collaborate in this regard. Work with the CARO to build stronger regional food security and resilience

"There's great potential in Ireland for more food being produced here instead of overseas" – Fergal Anderson, Leaf & Root and Talamh Beo Please see here their local food policy document which we strongly support.

We also strongly advocate for multi stakeholder supports for the establishment of Local Community Food, Health & Wellbeing Hubs and also the development of a Local Food Policy Council and strategy similar to the work taking place in Cork - The Cork Food Policy Council is a partnership between representatives of the community, food retail, farming, fishing, restaurant/catering, education, environmental and health sectors and local authorities. The Food Policy Council should be formed to work towards the achievement of a fairer, healthier, more secure and sustainable food system within Galway and throughout the region.

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from Kinvara Climate Action. In relation to the items raised, Galway City Council's responses are as follows:

1. Galway City Council is committed to positioning as a lead local authority with climate Action embedded in all our service deliverables, refer to Action 1, 2, 3, 16, 17, whilst also implementing the LATG climate Action training, Action 6
2. Galway City Council is committed to increasing public awareness of climate Action, Action 27.
3. Galway City Council is committed to increasing public awareness of climate Action, Action 16, Action 27.
5. Galway City Council is committed to creating sustainable and resilient communities as outlined within the LACAP, specifically Actions 1, 2, 3, 7, 15, 27, 28, 32, 34, 35, 40 and 42
6. Galway City Council is committed to maintaining a robust climate change risk assessment for Galway City during the lifetime of this plan, refer to Action 9. Furthermore, Table 2-2 in Section 2.1.3 outlines the RCP scenarios which have been considered as part of the development of the current risk assessment which factors in the current "worst case scenario".
7. Galway City Council is committed to promoting the spectrum of climate Action initiatives, refer to Action 27, Action 40.

8. Galway City Council is committed to supporting local food production, refer to Actions 27 and 40.

9. Galway City Council is committed to integrating climate positive requirements into all Galway City Council procurement processes.

10. Galway City Council is committed to implementing the Galway City Development Plan, Action 3

11. Galway City Council is committed to engaging with EU, National, Regional and Local organisations in positioning, Action 1 and 4, Galway City Council as a lead local authority in delivering climate Action, refer to Action 17.

12. Galway City Council is committed to engaging with local communities in implementing the spectrum of climate Actions, refer to Action 27. Furthermore, implementing the Community Climate Action Fund, refer to Action 32, a energy master plan to include renewables and energy storage, Action 8, and to pursue funding and schemes to promote community energy Action, Action 4.

13. With regard to higher energy performance standards, it is beyond the scope of the local authority to impose standards that are greater than those set out under legislation such as the building regulations (Part L of the Building Regulations transposes the European Energy Performance of Buildings Directive) or those required under Section 28 Ministerial Guidelines. The Climate Action Plan must adhere to national criteria for development. The Council policy as set out in the City Development Plan (Policy 2.4) is to encourage the design of high energy performance buildings through the siting, layout and design of new developments to make best use of renewable and low carbon energy opportunities and to encourage energy efficiency and conservation. It is also policy to support the retrofit and reuse of existing buildings in line with delivery of the proposed National Aggregated Model of Retrofitting. It also explicitly supports the implementation of the EU Energy Performance in Buildings Directive and the Building Energy Rating Certification (BER). In relation to local authority housing, it encourages high standards of energy conservation and improved energy performance and including for a deep retrofit programme of works (currently under the Energy Efficiency Retrofit Programme).

Galway City Council commits to seek funding for retrofitting an exemplar energy performance building during the lifetime of this plan, as outlined in Action 5.

14. Galway City Council recognises the initial release of funding is not sufficient to complete the transition to a sustainable resilient city; however it is understood there will be further releases of funding in following years which Galway City Council will implement to support community organisations, Action 32.

Furthermore, Galway City Council is committed to delivering the Green Spaces Strategy, Action 34.

15. Galway City Council is committed to delivering the Green Spaces Strategy, Action 34 along with growing the number of community allotments in the local authority area, Action 40 and supporting the maximum utilisation of the built environment in the city, Action 24.

16. Galway City Council is committed to exploring potential to include nature based solutions on all internal and Galway City Council permitted projects, refer to Action 42.

17. Galway City Council is committed to delivering the Green Spaces Strategy, Action 34 and delivering the Biodiversity Action Plan, Action 35. woodland master plans, Action 38, tree strategy, Action 37. Furthermore, the local authority is committed to exploring the potential to integrate Nature Based Solutions (NBS) in all internal and Galway City Council permitted projects, Action 42.

18. Galway City Council is committed to procuring alternative methods to weed control during the lifetime of this plan, Action 45.

19. Galway City Council is committed to exploring the potential to utilise Nature Based Solutions on all internal and Galway City Council permitted projects, Action 42, Action 41, 33 and 1.

20. Galway City Council is committed to the delivery of the Galway Transport Strategy (GTS) and the Galway Metropolitan Area Transport study (GMATS) which is currently ongoing, Action 47, 48, 55. Action 47 KPI will include count and brief summary of projects delivered annually, for example number of cycling and pedestrian interventions delivered, coupled with annual reporting on delivery progress of the Galway Transport Strategy and comparison of intercensal data in relation to walking or wheeling, cycling, and use of public transport. The GTS sets out a proposal for a city wide quality cycle network. This network is intended to

maximise coverage and increase dedicated cycle priority measures across the city linking with public transport hubs.

Galway City Council's website has an online map displaying over 1,040 on-street public cycle parking spaces available in the City. The Galway City cycle parking map was developed to show where over 1,040 on-street cycle parking spaces are available in the city, and will assist Galway City Council to identify locations where additional cycle parking would be beneficial. The map will be updated as additional cycle parking is added, or where stands are relocated.

Future planned Active Travel works will include Pedestrian and Cycle Safety Interventions across Galway City. The observations in relation to #Barriers2Galway maps are welcomed and will be examined as part of the overall development of further pedestrian infrastructure across the city.

As per the Galway Transport Strategy (GTS), a number of Active Travel initiatives are currently underway across Galway. Furthermore, a number of projects have recently been completed including those at Salmon Weir Bridge, Martin Junction, at Eglington Canal, Wolfe Tone Bridge and Millers Lane on the West of the City, as well as the South Doughiska Active Travel Scheme to the East. These initiatives focus on improving the city's walking and cycling infrastructure, and its public realm.

In relation to walking, one of the Strategic Aims of the GTS is "to increase the quality, comfort and safety of the pedestrian facilities." The projects listed above prioritise walking infrastructure as a core principle, while also seeking to make both cycling and public transport more attractive to the public. This is part of the overall aim which is to remove non-essential motorised traffic from the city centre area.

21. Galway City Council is committed to implementing initiatives to prevent and reduce waste across Galway City, Action 58 and 27. Galway City Council has commenced the installation of water fountains throughout the city. Galway City Council will review the utilisation of the stations and ramp up the installation of same over the lifetime of the plan. Galway City Council currently promotes a re-use your coffee cup campaign and has established a deposit and return coffee cup scheme in the city in 2021, refer to Action 1.

22. Galway City Council is committed to promoting sustainable local food production, Action 27 and 40.

Recommendation

Amend Action 47 KPI to: Number of projects completed annually **include count and brief summary of projects delivered, for example number of cycling and pedestrian interventions delivered, coupled with annual reporting on delivery progress of the Galway Transport Strategy and compare intercensal data in relation to walking or wheeling, cycling, and use of public transport.**

Submission 11

Submission By	Global Action Plan
Issues Raised	Unleashing community potential for change
Submission Summary	
<p>The submission acknowledges the quality of the draft plan as presented for the public consultation. The submissions outlines a number of areas that may strengthen the Council's commitments:</p>	
<p>1. The urgency and importance of Action at all levels</p>	
<p>At Global Action Plan, we believe that Ireland must do its utmost to urgently reduce the level of greenhouse gases we emit, and make transformational changes to the way we organise our society, ranging from energy generation and industry, to how we plan and manage cities, transportation and food systems. What we need is radical change at all levels: individuals, communities, companies and countries. We need to change the rules, change our habits and change our mindsets.</p>	
<p>To achieve the required change at all levels of society, Global Action Plan helps people understand the extent of their own personal contributions to our unsustainable lifestyles, and we support people in devising strategies to reduce their own impact. These Actions are important in themselves, and they also inspire others to make the changes that we so urgently need.</p>	

Ireland is, per capita, one of the worst climate polluters and a large part of our national greenhouse gas emissions is related to how we have chosen to live our lives. The decisions we make at home contribute directly to our poor climate track record as a country: how we heat our homes, how we cook, what we eat, how we travel, and the products we buy.

2. Unleashing community potential for change

While the section on Community & Resilience is welcome, we feel this section can be significantly strengthened, by greater emphasis on the encouragement and development of local, informed climate Actions.

There is a wealth of information indicating that people in Ireland are worried about the climate crisis. They believe Action is necessary and are willing to do their part, but there are practical reasons why this awareness does not translate into Action: For instance, media coverage focuses on stories of doom and gloom, with little perspective of hope offered, contributing to an environment of fear and a belief that a transition to a post-carbon society will involve costs, sacrifice and a loss of freedom.

This belief, coupled with the relative lack of visibility of existing climate Action initiatives, can lead people to think that the rest of society does not share their climate concerns, or that personal climate Action is meaningless until such time that “others” have changed their behaviour first.

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.

The Action Plan must address the ‘spiral of inAction’ that results from the a combination of factors:

3. Climate Action, Just Transition and Social Inclusion

The Action Plan is likely to fail unless it explicitly lists Actions to be taken to address the issues referred to under the ‘Just Transition’ concept.

We would recommend prioritising further reflection on how the Council's Climate Action Plan can contribute to 'Just Transition', 'Just Resilience' and Social Inclusion.

4. Community gardening

The submission welcome the references in the draft Action Plan to developing allotments and community gardens in the City. In our view, any effective response to climate change requires a fundamental rethink of many aspects of our society, including the use of land and the systems for food production, food distribution and food marketing, and community gardens are an important part of such a strategy.

Effective climate Action requires, inter alia, changing approaches to private gardens and public green spaces in the context of more extreme rainfall, promoting community rain gardens, discouraging hard paving in private gardens (as recently flagged by Dublin City Council), and retrofitting water butt installations. The draft Action plan will be strengthened by more explicit mention of these elements.

The Intergovernmental Panel on Climate Change (IPCC) highlighted urban agriculture initiatives such as community gardening as an important factor in strategies to reduce greenhouse gas emissions. Similarly, the Report of the Citizens' Assembly on Biodiversity Loss recognises that "urban environments have an enormous role to play in the conservation and restoration of biodiversity" and the value of green spaces to populations living in urban environments.

Furthermore, there is a wealth of evidence from academic studies that such green urban spaces have other benefits, not only in terms of food production, health and biodiversity, but also in relation to social inclusion, solidarity, and mental health.

It is therefore encouraging to see that Galway City Council has identified a role for itself in supporting allotments and community gardens throughout the city.

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from Global Action Plan, in relation to the items raised, response below:

1. The urgency and importance of Action at all levels

Galway City Council is committed to fulfilling the spectrum of local authority scope on climate action, Figure 1-4, through the delivery of this LACAP and the Actions therein, particularly collaborating with all stakeholders, Action 4 and 17.

2. Unleashing community potential for change

Galway City Council is committed to facilitating community potential on climate Action through the delivery of this LACAP, particularly through Actions 16, 27, 31, 32.

3. Climate Action, Just Transition and Social Inclusion

Galway City Council is committed to ensuring a Just Transition as outlined in Section 3.1 and through Actions 1, 3, 15, 27.

4. Community gardening

Galway City Council is committed to supporting community gardening in this LACAP, refer to Action 40 and the Galway City Green Space Strategy, Action 34.

Recommendation

No change to the draft plan.

Submission 12

Submission By	Galway City Community Network
Issues Raised	Multiple topics
Submission Summary	
The submission outlines a range of suggestions as outlined below under thematic headings.	
1. General	

GCCN requests that regular updates on monitoring, evaluation and oversight of plans are provided to stakeholders and the wider community, including updates on timelines of implementation of the Climate Action Plan. It is the view of GCCN that the monitoring process is a crucial element of the implementation of the plan. GCCN asks what does this monitoring look like and who are the stakeholders involved in the monitoring process? GCCN recommends that an oversight board external to Galway City Council is formed to be part of the monitoring process as well as an annual review with all the relevant stakeholders. GCCN also suggest that the work programmes for SPCs include Climate Action Plan implementation in which GCCN representatives can have input. GCCN also asks that all new infrastructure projects in the city will be quantified with carbon emissions data that are in line with national targets.

Theme: Governance and Leadership - Actions 1-21

Action 6: Include community (GCCN) and sectoral representatives on SPCs in climate Action training.

Action 9: Develop partnerships with educational, commercial and the community and voluntary sector through GCCN to conduct climate risk assessment on the future impacts of climate change in Galway City.

Action 14: Climate Action steering group should include community representation similar to structure of LCDCC.

Action 14/15: are key Action points for oversight and monitoring of implementation.

Action 16: Highlight and promote the advocacy, influence, and co-ordination role of Galway City Council with businesses, communities, and individuals.

Action 17: KPI - Full time staff is critical but also to include parks element of city council. GCCN suggests that all should be under remit of climate Action coordinator with permanent liaison with biodiversity officer and full cooperation between all departments.

Theme: Energy and Built Environment - Actions 22- 26

Action 24: As part of living city/ Croi Conaithe city scheme, GCCN recommends that tackling the illegal Airbnb problem is made a priority as the current situation creates unnecessary emissions with reports on progress back to Housing SPC on Airbnb and the reduction in derelict sites. GCCN requests a commitment to planning to locate homes closer to businesses and services with subsequent reduction of dependency on private cars, as specified by Climate Change Advisory Council's Annual Review in 2023 as highlighted here:

<https://www.climatecouncil.ie/news/press-release-climate-change-advisory-councils-annual-review-2023.html>

Action 25: GCCN recommends that this Action should include both public and private buildings on the register.

Action 26: GCCN suggests that the annual progress report towards 65% seems low - What is the baseline?

Theme: Communities Resilience and Transition - Actions 27-32

Action 27: GCCN asks that the KPIs should include a report to be made publicly available.

Action 28: GCCN recommends that this includes businesses and the local enterprise office.

Action 30: GCCN asks that this is increased to 30 water taps that are equally distributed across the city.

Theme: Environment and Biodiversity - Actions 33-46

Action 33: GCCN recommends the development of a flood alert database of interested organisations and individuals with a user-friendly flood alert mobile phone app.

Action 34: GCCN requests that the Green Space Strategy should engage with communities to promote awareness and good practices in local green spaces in residential areas, including management of hedgerows, trees, play areas and wildlife and pollinator friendly areas. Develop a city-wide biodiversity-rich greenway

network including the utilisation of existing boreens to connect the River Corrib, the city's canals, the Galway Bay seashore and the city's three municipal parks (Barna Woods, Merlin Woods and Terryland Forest Park)

Develop a city-wide network of 'ecological corridors' that connect areas of high biodiversity and wildlife sanctuaries that are free from human footfall.

Action 35: GCCN requests that the Galway City Biodiversity Action Plan - engage with communities to promote awareness and good practices in local green spaces in residential areas, including management of hedgerows, trees, play areas and wildlife and pollinator friendly areas.

Action 37: GCCN recommends that the Action point should Include a tree office and requests that percentage of trees are edible and native.

Action 38: GCCN requests dates for each wood/forest, not just Barna Wood. Expand the boundaries of all three municipal parks (Barna Woods, Merlin Woods and Terryland Forest Park) by purchasing adjacent lands where possible.

Ensure that the boundaries of all three municipal parks (Barna Woods, Merlin Woods and Terryland Forest Park) are protected from any built development such as roads, commercial or residential units.

Increase the rate of purchase by Galway City Council of lands within Terryland Forest Park that are still privately owned whilst recognising and respecting landowners that are establishing biodiversity friendly land methods and practice.

Action 40: GCCN asks that edible woodland to be included after allotments and to measure and track use of fertilisers.

Action 41: City Blue Space Strategy should be included in collaboration with National Parks and wildlife in addition to City Blueway Strategy.

Action 45: GCCN requests that this Includes all projects funded by Galway City Council and that 'organic' should be included in the wording.

Theme: Transport and Mobility- Actions 47-57

Action 47: GCCN suggests that the number of projects completed annually is a measurement of outputs not outcomes (or achievements) and should be dropped as measurement. Outcomes are measurable things like share of active travel as a proportion of all trips and improvements in level of service for access to key destinations measured against agreed criteria, e.g. distance on foot/bicycle, delay experience on foot/bike.

Action 48: Study should include impact of radical increase in provision of school transport.

Action 49: GCCN recommends developing a creative and imaginative campaigns to support uptake of Active Travel, highlighting health benefits and impact of reduced car use, particularly for journeys less than 2km with emphasis on there impact in reducing the 26% contribution of Transport to the Baseline Emission Inventory.

Action 50: Develop creative and imaginative campaigns to support uptake of Community Mobility Schemes, highlighting health benefits and impact of reduced car use. GCCN recommends that Actions should include delivery of the recommendations of the 2011 NTA Jacobs report on regional bike share including provision of two-way cycling on one-way streets and access through the city centre.

Measurements:

Action 52: The city council does not as a policy de-ice footpaths or cycle paths in icy conditions. Actions should include maintenance of active travel infrastructure in icy conditions and during leaf fall in autumn.

Active Travel Infrastructure - install bus shelters at 50% of bus stops, with up-to-date timetable information and real time information display.

share of active travel as a proportion of all trips.

improvements in level of service for access to key destinations measured against agreed criteria, e.g. distance on foot/bicycle, delay experience on foot/bike.

- number of people who feel obstructed, threatened, or endangered at specific locations when cycling or walking to work.

- Number of people who have access to secure bike parking at work.

- Number of people who have received cycle training.

The number of projects supported annually, and quantity of funding is a measurement of outputs not outcomes and should be dropped as measurement.

- Number of trips per share bike.

- Availability of share bikes and stations daily. The level of service between the bike share stations by agreed criteria, e.g. distance required to go on a bicycle to reach the next station compared with the theoretical shortest path, sources of delay along the routes between the bike share stations.

Theme: Sustainability and Resource Management - Actions 58-60

Action 58: GCCN recommends that a recycling facility is built on the west side of the city.

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from the Galway City Community Network with responses outlined below.

1. Galway City Council are satisfied that the monitoring and reporting requirements for the climate Action Plan have been outlined in Section 5 and action 14 of the plan. Galway City Council have committed to implementing climate positive requirements and life-cycle costing into its procurement process, action 7.

Theme: Governance and Leadership - Actions 1-21

Action 6: Training for community (GCCN) and sectoral representatives is provided for under action 15 and 49 of the plan.

Action 9: Galway City Council commits to updating the climate action risk assessment on an annual basis under action 9 and working with various groups across a range of activities under action 4 of the draft plan.

Action 14: The Strategic Policy Committee will offer the community groups the forum to review and assess the progress of the climate action plan in line with Section 5 of the draft plan.

Action 14/15: Comments noted.

Action 16: Galway City Council commit to establishing the public website under action 16 of the draft plan.

Action 17: Galway City Council commit to collaboration between internal departments under all actions within the draft plan.

Theme: Energy and Built Environment - Actions 22- 26

Action 24: Galway City Council remains committed to delivering the City Development Plan 2023-2029 as the principal plan in outlining development objectives for the city. Galway City Council remains committed to implementing enforcement of Airbnb's within the city.

Action 25: Galway City Council has remit of its owns building stock only.

Action 26: Galway City Council has set this target based on the Baseline Inventory of Emissions located at <https://www.galwaycity.ie/climate-action-plan> and a pathway to achieving 2030 targets as it progresses to net zero by 2050.

Theme: Communities Resilience and Transition - Actions 27-32

Action 27: Galway City Council are satisfied that the monitoring and reporting requirements for the climate Action Plan have been outlined in Section 5 of the draft plan.

Action 28: Galway City Council commit to requiring all organisations to outline climate actions as part of grant funding models under its remit under action 28 of the draft plan.

Action 30: Galway City Council have identified the target based on resources and funding availability to deliver action 30.

Theme: Environment and Biodiversity - Actions 33-46

Action 33: Comments noted, Galway City Council agrees to amend action 12 to include consider rollout of the MapAlerter localised alert and notification service (SMS, App and Email) and to amend Action 16 to consider a “citizen engagement” section of the public engagement website where such flood and climate change impacts can be recorded to establish such database.

Action 34: Galway City Council is committed to community engagement in implementing the Galway City Green Space Strategy and in implementing climate action initiatives, refer to Action 15 and 27.

Action 35: Galway City Council is committed to community engagement in implementing the Galway City Biodiversity Action Plan and in implementing climate action initiatives, refer to Action 15 and 27.

Action 37: Galway City Council intend to utilise native and edible species as part of Action 37 in internal projects and ensure implementation of same requirements within external permitted projects.

Action 38: Action 38 KPI ammended In addition to the woodland management plans, GCC undertake to review the availability of lands for potential development of native amenity woodlands as part of the forthcoming City Tree Strategy, Action 37.

Action 40: Galway City Council will consider orchard planting adjacent to new allotments if suitable with regards to available space and other considerations such as maintenance and climatic conditions. Galway City Council will track the use of fertiliser as part of the annual data collection survey of allotment holders.

Action 41: Amend Action 41 to include National Parks and Wildlife Service (NPWS).

Action 45: As part of GCC's duty under the Sustainable Use of Pesticides Directive, and as part of day-to-day Operations activities in weed control and invasive species management, GCC will continue to undertake an Integrated Pest Management (IPM) to establish alternative approaches or techniques, such as non-chemical alternatives to pesticides.

Theme: Transport and Mobility- Actions 47-57

Action 47: Action 47 KPI will include count and brief summary of projects delivered annually, for example number of cycling and pedestrian interventions delivered, coupled with annual reporting on delivery progress of the Galway Transport Strategy and comparison of intercensal data in relation to walking or wheeling, cycling, and use of public transport.

Action 48: Galway Transport Strategy, Action 47, and Galway Metropolitan Area Transport Strategy (GMATS), Action 48, will include for the provision of infrastructure routes to places of education, Galway City Council will liaise with Department of Education in delivery of same.

Action 49: Galway City Council is committed to community engagement in promoting Active Travel throughout Galway City, and in implementing climate action initiatives, refer to Action 15 and 27.

Action 50: Galway City Council is committed to community engagement in promoting referenced community mobility schemes once established throughout Galway City, refer to Action 50, and in implementing climate action initiatives, refer to Action 15 and 27.

Measurements:

Action 52: Galway City Council is committed to engaging with the NTA on active travel maintenance, refer to Action 52, refer to Action 47 updated KPI.

Theme: Sustainability and Resource Management - Actions 58-60

Action 58: Galway City Council is committed to supporting the Waste Enforcement Regional Lead Authority(WERLA) and Environmental Protection Agency(EPA), Action 60, and in relation to waste management compliance with a feasibility study for green waste management to provide compost for public use, Action 40.

Recommendation

Amend Action 12 to: Deploy weather impact register (WiRE) app to ensure GCC capture information of adverse climate events in a central location for future

records, ease of location and reference. Consider rollout of the MapAlerter localised alert and notification service (SMS, App and Email).

Amend Action 12 KPI to: - Annual review of orange/ red weather warning events recorded on Wire App ~~and develop a trend profile~~. - MapAlerter service rollout decision by 31.12.2024. Add Communications to action owner.

Amend Action 16 to: Develop public website which displays progress on implementation of climate action plan and details example climate action projects. Consider a "citizen engagement" section of the public engagement website where such flood and climate change impacts can be recorded to establish such database.

Amend Action 16 KPI to: Website in place by ~~30.06.2024~~ 31.12.2024.

Amend Action 40 KPI to: Development of annual survey of allotment growers to establish database of local food production and fertiliser use.

Amend Action 41 to: Support the development of a City Blueway Strategy for rivers and canals that considers maintenance, biodiversity, climate adaptation and emissions reduction and is informed by ecological assessment and provision of appropriate buffers and wildlife corridors in collaboration with Office of Public Works (OPW), Inland Fisheries Ireland (IFI), National Parks and Wildlife service (NPWS), and Lough Corrib Navigational Trustees (LCNT).

Amend Action 47 KPI to: Number of projects completed annually include count and brief summary of projects delivered, for example number of cycling and pedestrian interventions delivered, coupled with annual reporting on delivery progress of the Galway Transport Strategy and compare intercensal data in relation to walking or wheeling, cycling, and use of public transport.

Submission 13

Submission By	Ian Coleman
Issues Raised	Multiple topics
Submission Summary	

The submission requests the following items:

1. Galway City to pursue the 30 by 30 initiative - 30 percent of land and water protected for nature by 2030.
2. To install a particulate pollution measuring device and make the data available publicly in real time
3. To see a clamp down on the burning of solid fuels in residential areas
4. Clamp down on the sale of invasive species in garden centres, which is illegal but not enforced
5. To see protected bike lanes and EV charging stations

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from Ian Coleman, in relation to the items raised our response is as follows:

1. Galway City Council remains committed to delivering the City Development Plan 2023-2029 as the principal plan in outlining development objectives for the city. Notwithstanding such, Galway City Council is committed to launching the Green Spaces Strategy (GSS) in 2024 and continuing implementation of the current Biodiversity Action Plan (BAP) 2014-2024 and future instances thereof.
2. Galway City Council currently have 3 air quality monitoring devices at locations throughout the city measuring PM & NO₂ at Briarhill and Eyre Square with a further PM sensor in Ragoon, the results of which are publicly accessible at www.epa.ie/air
3. Galway City Council adheres to national legislative building regulations, it should be noted that current national legislation does not restrict solid fuel combustion in residential properties which were constructed to building regulations at such time where solid fuel combustion was permitted. Galway City Council remains committed to implementing enforcement under the Air Pollution Act, 1987 and the Air Pollution Act (Marketing, Sale, Distribution and Burning of Specified Fuels) Regulations, 2012.
4. Galway City Council is currently developing an invasive species strategy, Action 36. Galway City Council does not currently possess legislative powers in

restricting the sale of invasive species in garden centres as regulation 50 of statutory instrument (SI) 477/2011 legislation is not currently enacted.

5. Galway City Council is committed to publishing the Electric Vehicles Charging Strategy, Action 57. As per the Galway Transport Strategy (GTS), Action 47, a number of projects have been completed to increase permeability routes, examples of this being at the Eglington Canal, Millers Lane and the South Doughiska cycle lanes. Other routes are currently being examined. In relation to walking, one of the Strategic Aims of the GTS is "to increase the quality, comfort and safety of the pedestrian facilities." The projects in the GTS prioritise walking infrastructure as a core principle, while also seeking to make both cycling and public transport more attractive to the public. This is part of the overall aim which is to remove non-essential motorised traffic from the city centre area.

Recommendation

No change to the draft plan.

Submission 14

Submission By	Galway National Park City Initiative
Issues Raised	General Plan
Submission Summary	
<p>The submission warmly welcomes the Galway City Climate Action Plan as one of the most important plans ever to come from Galway City Council and something that should be wholeheartedly supported and developed by all stakeholders of the city.</p> <p>The submissions seeks for the pioneering initiative of the Galway National Park City and its works should be acknowledged with the Galway City Climate Action Plan as the submitter states much of the Galway City National Park Initiative have have as their vision, aims, principles and structure are integrated into the Galway City Climate Action Plan.</p>	

CE Response and Recommendation**Response**

Galway City Council acknowledges and welcomes this submission from the Galway National Park City Initiative.

Notwithstanding the transformational efforts being performed by the Galway City National Park Initiative, Galway City Council's plans and strategies are led by the aims & objective of the City Development Plan (CDP). The CDP refers to the Green Spaces Strategy (GSS) and the Biodiversity Action Plan (BAP) in relation to the management and future development of the Green Network in the city (trees, hedgerows, meadows, wetlands, rivers, forests, ecological corridors etc). There are many overlaps and commonalities between the aims & objectives of the National Park City and the GSS and BAP. Our focus, plans and strategies are led by the aims & objective of the City Development Plan.

Recommendation

No change to the draft plan.

Submission 15

Submission By	Galway Greens
Issues Raised	Multiple topics
Submission Summary	
<p>The submission outlines several items as summarised below.</p> <p>1. Sectoral Targets</p> <p>At a national level we have sectoral targets, but it is not at all clear how those translate into Actions in this document. We accept that it is a challenge that the local authorities guidance is divided between control over the council's own assets and lesser control over the city as a whole.</p> <p>For this reason we propose that Galway City Council seek national guidance on the development of Carbon Budgets and Accounting for Actions/objectives in GCC</p>	

plans to ensure consistency with the sectoral carbon targets. Also seek national guidance on long-term multi-decade sea level rise and consider as part of long-term land use planning, including in the development of the next iteration of the City Development Plan.

2. Planning Enforcement

It is a huge challenge that developers violate planning conditions when it comes to permeability, which has transport implications, and in terms of protecting nature. While the planning department is restricted by law and the planning process, it needs to be recognised that the decisions made, or delays in decisions made have a climate impact. Planning enforcement does have discretion in some areas. For example where urgent Action is required an enforcement notice can be issued without a warning letter and the associated four week notice period. Until now, individual cases of loss of biodiversity, we believe, has not been treated as an emergency.

Another weakness in terms of planning is the current legislation for Tree Protection Orders. Hopefully that legislation will be updated during the lifetime of this plan.

3. Health

A number of the pre-draft submissions, including from the Green Party, referenced the health risks due to climate change. We are pleased to see a number of Actions related to air pollution and water quality include in the plan.

Heatwaves that have impacted Europe and the UK in 2023 may happen in Ireland in some summer soon. As part of Action 11, Ireland should be looking to the government and local authority responses in those other countries to see if we can learn about caring for the vulnerable in the community during such an event.

4. Grattan Beach

The Living Lab at Grattan beach has been a big success. The council, Arup and the University of Galway have done great work there. But it is not referenced in the plan. We propose that an Action related to this project should be added to the Environment and Biodiversity section of the plan, and that GCC should continue to educate the public on the goals and achievements at this site.

5. Galway City Ring Road

While we do not know the ABP decision on the GCRR, it is a glaring omission that this document makes no reference to it. We could in theory revise the document once the answer is known (even though the ABP decision will not necessarily be the end of uncertainty in this area). But at the very least this document should inform the public that the GCRR, if built, will have a climate impact.

For example, the plan references a 20% drop in KM travelled. Building new roads will increase the number of KM travelled making this target harder to reach. While this plan can not call out whether the road should be built or not, it is part of the role of this document to identify climate issues and risks in Galway and the road is the biggest climate choice facing us. By not even mentioning it, this document pretends it is not a climate issue, when it is the role of this plan to put all relevant facts before the people of Galway.

We recognise that the GCRR is a politically sensitive issue an raising it in this document in any way which referenced its climate impact would make it more difficult to get this document adopted by the elected members. But the goal of this document should be to represent scientific and engineering reality. Any path which leads to GCC adopting plans that embrace climate targets and then follow it up with Actions that make those targets impossible does a disservice to the city.

6. Action 6 and Acton 17

Anxiety due to the scale of the climate challenge facing us is becoming more and more prevalent in the community, especially among our youth. Some of us have our own coping mechanisms, but those working in the area whether as elected representatives or as council staff members need to be particularly aware of the need to perform a job without being overwhelmed by the possible implications of the issue we are trying to address. Council staff should have access to some support in this area and it should be incorporated into the training referenced in Action 6.

7. Action 38

I interpret from this statement that there are no plans to develop any new woodlands. This is a step backwards from the previous plan. The following is an Action from the previous plan, the Climate Adaption Strategy 2019-2024:

Action 4.2 Work with CARO on identification of public lands that can be funded under the Woodland Creation Scheme on Public Land

Has it been decided to not seek new areas for afforestation, and just try to enhance the existing areas?

Do we need a management plan for Barna. Would we be better to implement Actions from the previous plan (The Barna Woods Project Biodiversity Report, 2009). Even if that document is a bit out of date, taking Action will always be more valuable than another plan. I fear that no Action will be taken for twelve months while we wait for the plan.

8. Action 6, 27,37, 40, 42, 53, 58

I am concerned that it will be difficult to measure success. Under many of the KPI's it calls out % or the word 'number' but without an actual figure. For example, Action 40 states "Number of community gardens and allotments added annually." But no target number stated.

Maybe the targets are outside the scope of this document. Since we can not in this document make a commitment that is part of a plan that resides somewhere else in the council (in this case Recreation and Amenity). But by not stating a target in this plan, do we assume that there is no target in Recreation and Amenity either?

I realise that other local authorities are doing the same thing, so I assume it matches the guidance for preparing this document, but it does seem to be a huge gap in the process if we do not have specific targets.

9. Action 14

The program for government called for Climate Action SPCs to be set up in each local authority. An SPC would have standing orders a predefined representation from the elected members and from the community. I think an SPC would be a more appropriate oversight than a steering committee.

10. Action 37

There is no mention here of Tree Protection Orders. Stronger legislation is on the way, and the council need to ensure that we, at some point in the life of the plan, start to apply and enforce Tree Protection Orders.

11. Action 15

The National Park Cities group in Galway (<https://galwaynationalparkcity.com/>) has already established a network of Ambassadors in a number of clubs and businesses around the city. I believe this should be leveraged.

12. Action 45

Following the extension of the use of glyphosate by the EU, we can now give up any hope of the EU delivering on their promise to ban it, so local Action is more important than ever. Parks have already made good progress on removing the use of herbicides. We need to set a target sooner than 2029 if we want to see any meaningful Action in transport during the life of this plan – and there is no reason to put it so far away. If the EU had carried through on their ban, we would be doing it already. If an earlier year than 2029 is not possible then an Action to report volumes of use of glyphosate by roads section and any contractors used by the roads section on an annual basis. At least we would then have a measure of the scale of the use by the council.

13. Action 53

The term “zero emissions” is used. There are also references to HVO in some of the other Actions. There are differing opinions on the carbon footprint of HVO. We do not particularly want to have that debate as part of authoring this document, but within the document, we should be clear as to whether HVO is included as a “zero emissions” fuel, so that the document is not ambiguous.

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from Galway Greens and the items raised. Galway City Council responds to each of the items raised as follows:

1. Sectoral Targets

Galway City Council is committed to working with the Government Departments on measures to combat climate change across a range of measures including carbon budgeting, accounting and sea level rise, Action 4, subject to provision and allocation of resources and budget for such.

2. Planning Enforcement

Galway City Council is required to follow national guidelines and legislative procedures on planning enforcement.

3. Health

Action 11 ammended to leverage best practices and learnings from government and local authority responses in other countries where climate events have occured to leverage knowledge in formulating Galway City's responses. Action 10 supports implementation of the EU Mission on Adaptation to Climate Change Programme.

4. Grattan Beach

Galway City Council have intentionally not cited specific projects within this LACAP to avoid omitting any projects due to the lifespan of the plan, Action 27 and Action 42 supports the implementation of a broad spectrum climate Action work programmes over the lifetime of this plan.

5. Galway City Ring Road

Galway City Council is committed to the delivery of the Galway Transport Strategy (GTS), Action 47, and the development of the Galway Metropolitan Area Transport Strategy (GMATS), Action 48 and 55. At the time of publishing this plan, the application for the proposed Galway City Ring Road is with An Bord Pleanála for their consideration. The Bord will have consideration for the application for the proposed N6 Galway City Ring Road and will have regard to the Climate Action and Low Carbon Development (Amendment) Act 2021 and Climate Action Plan

2021. Galway City Council will support the decision of An Bord Pleanála in relation to proposed N6 Galway City Ring Road.

6. Action 6 and 17

Galway City Council staff are provided ongoing climate change training through the Climate Action Regional Office, Sustainable Energy Authority of Ireland and other entities as required. These training opportunities are provided also to elected members who also receive further training through the Association of Irish Local Government.

7. Action 38

Galway City Council is committed to identifying and implementing urban native amenity woodlands over the lifetime of the plan, as informed by the Green Spaces Strategy (Action 34) and Tree strategy (Action 37).

8. Action 6, 27,37, 40, 42, 53, 58

As the KPI for these Actions Galway City Council have committed to reporting annual % increase and number of actual projects/Actions delivered for each of the respective Actions annually. To have an overall target number for each of the respective Actions was not feasible within the timeframe required for the development of this plan.

9. Action 14

There is an existing climate Action strategic policy committee within Galway City Council who meet on a quarterly basis. This committee will monitor progress associated with the climate Action plan going forward. Please also see Section 5 of the plan which details monitoring and reporting requirements.

10. Action 37

Galway City Council is committed to implementing national legislation which may arise over the lifetime of this plan, refer to Action 4.

11. Action 15

Galway City Council is committed to engaging with all community groups as part of the implementation of this LACAP, refer to Action 15 and 27.

12. Action 45

As part of the Sustainable Use of Pesticides Directive, Galway City Council is required to track and submit volumes of pesticide in use in its operations. Through Action 45, Galway City Council is committed to trialling alternatives to reduce pesticide reduction over the lifetime of this plan with a view to replacing the use of pesticide by 31.12.2029. Galway City Council recognise the timeline assigned to this action is reflective of the application purpose of pesticide in controlling invasive species, refer to Action 36 for invasive species management plan, and timeline involved in sourcing an alternative sustainable solution.

13. Action 53

Galway City Council understand that Hydrotreated Vegetable Oil is not "zero emission" however deem that it is a suitable transitional fuel as we strive for 2030 targets. Hydrotreated Vegetable Oil is intended to be utilised for vehicles that cannot yet be changed over to fully zero emissions vehicles such as Heavy Goods vehicles. As technology improves and additional stock becomes available it is intended that further iterations of the plan will strive for net zero emissions to align with national targets set out for 2050.

Recommendation

Ammend Action 11: Review and update Galway City Council Major Emergency Plan to ensure incorporation of climate risks such as flash floods, storms, heatwaves, droughts and wildfires for Galway City, leverage best practices and learnings from government and local authority responses in other countries where climate events have occurred to leverage knowledge in formulating Galway City's responses.

Submission 16

Submission By	Conor Dowd
Issues Raised	Decarbonisation Zone restructuring

Submission Summary

The submission outlines concern the establishment of the decarbonisation zone which is a relatively small area of Galway City, implies the overall emissions reduction target for the city will not be achieved. Submission also outlines concern with targeted Actions becoming individualised towards residence within the decarbonisation zone, as opposed to central government climate Action and justice. The submission proposes the decarbonisation zone be extended to the entire city simultaneously.

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission, in relation to the decarbonization zone plan set out in the draft climate Action plan. Galway City Council identified the decarbonisation zone presented following instruction from the Government Department of Housing & Local Government & Heritage Circular Letter LGSM01-2021, following Action 165 of the Government's Climate Action Plan 2019.

The emissions reduction target for the decarbonisation zone area and the entire city are consistent with each other, that is to reduce emissions by 51% from 2018 levels by 31st December 2030. The purpose of the smaller decarbonisation area being to pilot the Actions identified in a defined area, evaluate their performance and rollout across the city if successful. The decarbonisation zone pathway presented in the draft plan outlines one potential pathway towards achieving this target for the zone. Galway City Council are confident the range of Actions presented will enable achievement of the targets for the decarbonisation zone by 2030 and will enable successful rollout across the city-wide area. Galway City Council emphasises the decarbonisation zone plan presented within the local authority climate Action plan is one such pathway to achieving the 51% emissions reduction required. However, it must be noted resources or funding has not been allocated to Galway City Council from central Government for the delivery of Actions within the decarbonisation zone section of the plan.

Recommendation

No change to the decarbonisation zone plan contained within the climate Action plan.

Submission 17

Submission By	Malena Then
Issues Raised	Multiple topics
Submission Summary	
<p>The submission outlines several suggestions as detailed below:</p> <ol style="list-style-type: none"> 1. Section 1.2 should include at least a mention of nature restoration law as this is likely to be formally adapted in Q1 of 2024 2. Section 2 Sentence to be added: Evidence based climate Action also means innovative rethinking of old/ traditional development concepts mentioned in past strategies and plans for Galway in the context of rapidly accelerating climate Change, with evidence-based solutions improving Galway in a modern, sustainable way. 3. Section 2 to be added, a council for scientists to meet quarterly and host a Q and A for the citizens of Galway would be appropriate, with Scientists NOT chosen by councillors to enforce separation of powers. Attendance of the Q and A is mandatory for councillors. 4. Section 3.2.1, to be added, include a theme on youth engagement: Climate Crew to engage here 5. To be added, Reassessment of current Galway city and council plans in context of this new CAP once approved 6. Action 12, requirement to assess nature-based solutions for every infrastructural project in Galway city. Planning application must include detailed section on this, not just SUDS (sustainable drainage systems), otherwise GCC will request an FI (further information request) on said project 	

- 7.** Action 14 Action steering group to be made up of scientist and local community with appropriate representation of Galway City demographic as per latest census and to publish minutes of each meeting no later than two weeks post-meeting.
- 8.** To be added, Use modern media approach to inform people of Galway of any climate related news in Galway County.
- 9.** KPI 27, support local community groups through feedback forms and financially. KPI for this ID to be updated with a minimum amount of feedback forms received and certain minimum spending allocated by End of each Year. Could be voted on by residents?
- 10.** Section 3.2.3/4, to be added, GCC to support Galway city's application and goals to become national park city
- 11.** To be added, financially support schemes within circular economy and food waste reduction (e.g. Student pantry, glassary, student second hand store) and make applications more accessible
- 12.** Section 3.2.4, Action 33, flood relief scheme to follow best practice and SUDS principles – Galway City could be leading in innovation as a sustainable thriving coastal city.
- 13.** To be added, to build animal bridges to connect green spaces of Galway – focus on Terryland or as appropriately assessed within GCC.
- 14.** Action 37, to include appropriate NATIVE plant mixes and appropriate management techniques (Dublin City Council tree strategy, no pruning!) with a focus on hedgerows and trees (as there is data available that shows no environmental sound techniques are followed - 2023 thesis)
- 15.** Action 38, develop in conjunction with community groups in these areas
- 16.** Action 36, to finance removal of invasives in Galway County Council, with a focus on Connemara and Kylemore abbey, prevent any further spread and spread awareness what invasives are, and prohibit their sale in Gardening centres as is the case now.
- 17.** Action 40, educate and spread awareness on mediterranean/ plant based diets, local produced foods and their benefits. Galway city council events/ canteen

to be only plant based to lead by example. Strive to have at least one fully plant based day/ week in every public school in the county by Q2 2025.

18. Action 46, engage with biodiversity data centre to run citizen science initiatives across Galway by using its unique access to nature to spread awareness and develop local pride in natural heritage.

19. Action 45, hedge tree cutting to follow environmental principles (brown hairstreak butterfly)

20. Section 3.2.5, Action 47, to have a transport strategy that does not rely on the N6 bypass and has a time set by when the planning application must have been acquired (I would suggest end of 2025 as reasonable time for application and possible appeal process – we have to move out of this stalemate!)- otherwise another alternative not involving a ring road around Galway must be available to be implemented and included in metropolitan transport strategy that is being drafted by NRA at this time and for Galway County Council to support alternatives without the Ring road.

21. Action 49, follow best practice for cycling infrastructure that puts active travel and safety first (barriers to be placed where Cycle way is painted on road by Q1 2025.)

22. Action 49, to implement across Plans and programmes a shift away from cars towards other modes of transport, a shift that is visible in allocation of future budgets towards non-car road initiatives) which is reported annually

23. Action 52, reassess constructed cycling infrastructure through a cycling action group that must be made up at least 51% by local community groups that have long commented on this issue such as the Galway cycling campaign.

24. Action 53, to take out “as a priority” phrasing, as this is not mentioned elsewhere.

25. To be added, increased enforcement of traffic regulation violations that negatively impact active travel (KPI – survey of people feeling safe cycling in Galway such as parking in cycle lanes, running lights, dangerous overtaking of cyclists etc), to record incidents of violations recorded by gardai)

- 26.** To be added, to enforce speed limits in Galway city through red light and speed cameras (average speed measurements) as increased speeds= increased emissions. KPI – number of cameras etc installed by end 2024, baseline study of speeding then comparison annually (non-announced day as it was announced it would not be a neutral response (not like national speeding day)
- 27.** Section 3.2.6 Action 61, advocate for composting in inner city collections (Barna recycling does not offer compost collection in Dominick Street for example)
- 28.** To be added, single use coffee cup free city pilot scheme based on killarney by end of 2024
- 29.** Action 63 Advocate for local organic produce and actively advertise second hand shops (maybe a GCC assessed climate badge for sustainable shops that fulfil certain criteria/ at end of year a celebration of most sustainable shops/ initiatives like the mayor awards?
- 30.** Section 5.3, report on progress of KPIs annually, with section dedicated to how KPI targets that were missed prior will be reached.

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from Malena. Then, in relation to the items raised, Galway City Council's responses are as below:

1. Galway City Council are aware of the proposed EU restoration law; however, this is not drafted nor adapted by the European Bodies as of January 2024. Any subsequent adaptation will cascade through Government and possible local authority Actions, Action 4.
2. Refer to Section 3.1 for the Vision and Mission of this plan.
3. Galway City Council is committed to establishing an ambassador programme, Action 15.
4. Public engagement sessions were held in November, December with online consultation during same period along with non-statutory online public consultation in September and October also. Young people will be one of the representative groups included in implementing Action 15. Galway City Council also have reporting function towards the Strategic Policy Committee (SPC) with responsibility for Climate Action (Action 1) and the publicly accessible website which will be developed through Action 16.
5. Actions throughout the Governance and Leadership theme refer to embedding climate action within Galway City Council functions, refer to action 1, 2, 3, 4, 7, 17.
6. Refer to Action 42.
7. Action 14 refers to the internal Galway City Council Climate Action Steering Group. Galway City Council is committed to establishing an ambassador programme, Action 15, through which Galway City Council will seek to engage with representative community stakeholders.
8. Galway City Council utilises social media to promote local authority services, as part of a wide range of media engagement measures. Galway City Council intend to seek climate ambassadors from the community under Action 15 and aim to develop a climate action website under Action 15 to disseminate knowledge. Galway City Council also have reporting function towards the Strategic Policy Committee (SPC) with responsibility for Climate Action (Action

- 1) and the publicly accessible website which will be developed through Action 16.
- 9.** Galway City Council is committed to delivering Action 27 to engage with and support community groups, along with delivery of the Community Climate Action programme fund, Action 32.
- 10.** Notwithstanding the transformational efforts being performed by the Galway City National Park Initiative, Galway City Council's plans and strategies are led by the aims & objective of the City Development Plan (CDP). The CDP refers to the Green Spaces Strategy (GSS) and the Biodiversity Action Plan (BAP) in relation to the management and future development of the Green Network in the city (trees, hedgerows, meadows, wetlands, rivers, forests, ecological corridors etc). There are many overlaps and commonalities between the aims & objectives of the National Park City and the GSS and BAP. Our focus, plans and strategies are led by the aims & objective of the City Development Plan.
- 11.** Galway City Council have launched the community climate Action programme fund which is currently open for applications, Action 32. More information on the fund and application process is available on [GalwayCity - Community Climate Action Programme](#).
- 12.** Action 33, noted.
- 13.** Galway City Council intend to launch the Galway City Green Space Strategy in 2024, Action 34, and implement Actions within the current Biodiversity Action Plan and new revision of same for 2025-2030, Action 35.
- 14.** Galway City Council intend to utilise native species as part of Action 37 in internal projects and ensure implementation of same requirements within external permitted projects.
- 15.** Galway City Council will engage with local stakeholders as part of Action 38.
- 16.** The submission refers to areas in Galway County. In respect of invasive species control in Galway City, refer to Action 36.
- 17.** Refer to Action 7 and 27.
- 18.** Action reference number does not correlate to action description of submission detail. Galway City Council is committed to engaging with community groups, Action 27.
- 19.** Refer to Actions 34, 35, 37, 38.

- 20.** Galway City Council is committed to the delivery of the Galway Transport Strategy (GTS), Action 47, and the development of the Galway Metropolitan Area Transport Strategy (GMATS), Action 48 and 55. At the time of publishing this plan, the application for the proposed Galway City Ring Road is with An Bord Pleanála for their consideration. The Bord will have consideration for the application for the proposed N6 Galway City Ring Road and will have regard to the Climate Action and Low Carbon Development (Amendment) Act 2021 and Climate Action Plan 2021. Galway City Council will support the decision of An Bord Pleanála in relation to proposed N6 Galway City Ring Road.
- 21.** Galway City Council follows the National Standard, Design manual for Urban Roads and Streets in all upgrades and new projects. This is detailed in the GTS appendix D Public Transport Infrastructure Development
<https://www.galwaycity.ie/galway-transport-strategy>
- 22.** Galway City Council is committed to the delivery of the Galway Transport Strategy (GTS), Action 47, and the development of the Galway Metropolitan Area Transport Strategy (GMATS), Action 48 and 55, a number of Active Travel initiatives are currently underway across Galway.
- 23.** Action 52 refers to engaging with the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) for active travel maintenance. Galway City Council is committed to engaging with stakeholders throughout the non-statutory and statutory consultation process in the delivery of Actions 47 and 49.
- 24.** Action 53, “as a priority” should read as referring to upgrading the TFI fleet in Galway as a priority City.
- 25.** Galway City Council is committed to supporting the uptake of active travel modes across Galway City, Action 49, implementation of the Galway Transport Strategy, Action 47, and completion of the Galway Metropolitan Area Transport Strategy (GMATS), Action 48. Galway City Council is committed to implementing programmes to support active travel and road safety schemes, Action 27.

- 26.** Galway City Council implemented a bye-law in 2023 to reduce the inner city centre speed limit to 30km/h, enforcement of speed limits and red light violations is beyond the remit of the local authority.
- 27.** Galway City Council will seek to ensure compliance with National Legislative Requirements for waste collection, refer to Action 58 and 60.
- 28.** Galway City Council currently promotes a re-use your coffee cup campaign and has established a deposit and return coffee cup scheme in the city in 2021, [GalwayCity - Use your Mug!](#) refer to Action 1.
- 29.** Galway City Council is committed to promoting the circular economy and local produce, Action 27 and 60. Galway City Council is committed to encouraging climate action through the Galway City business community, Action 20 and organisations outlined climate actions to be enabled through grant funding, Action 28.
- 30.** Section 5.3 outlines the reporting requirements for this LACAP, Galway City Council also have reporting function towards the Strategic Policy Committee (SPC) with responsibility for Climate Action (Action 1) and the publicly accessible website which will be developed through Action 16.

Recommendation

Update wording on Action 53, “as a priority” is intended to refer to having the upgrade of the TFI fleet as a priority **city**.

Submission 18

Submission By	People Before Profit Galway
Issues Raised	Multiple topics
Submission Summary	

The submission outlines several items as summarised below:

1. Section 1.1 Input evidence from Met Éireann that 2023 was the warmest year on record
2. Figure 1.2 "Loss of biodiversity" should be moved from "slow onset processes", recognising the rapid loss of 70% of wildlife species biomass since 1970
3. Section 2.1.1 "Disruption of supply chains" should refer to the impact on consumers who will be faced with higher costs for items such as food
4. Section 2.1.3 Galway City Council should recognise the impact that increasing impact and frequency of climate change related events will have on the healthcare services and other frontline services e.g. Fire and Rescue, including the workers
5. Section 2.1.3, Table 2-2 This table makes consistent references to RCP4.5 and RCP8.5, scenarios of global emissions which would result in a global temperature increase of 2°C - 4.3°C. The table should outline that these scenarios are incompatible with life as we know it.
6. Action 1 - Improved clarification on KPI regarding including climate Action with regards to projects. Will the negative impact/s on climate, local or otherwise, be accounted for as a method to seek alternative solutions or prevent a project's delivery?
7. Action 4 - Ensuring Galway City is Net-Zero by 2050 is admirable, however, these aspirations fall short of where we need to go. Galway City Council should be pushing to deliver a Carbon Negative City by 2050.
8. Action 6 - All Local Authority staff, including councillors and other elected members, should be provided with continuous, compulsory climate change and climate Action training.
9. Action 8 - Energy Master Plan should be accelerated and delivered by Q1 2025.
10. Action 10 - "people of..." should read 'people of Galway'
11. Action 14 - Climate Action Steering Group Reports should be available to the general public online or otherwise, without requirement of Freedom of Information requests

- 12.** Action 26 - Increase ambition to upgrade all social housing to above a B2 BER standard
- 13.** Action 37/38 - Tree Strategy should include details of preserving native and existing tree and greenery within Galway City Planning permission or similar requirement to be introduced for removal of native species within Galway City boundary
- 14.** Action 42 - Nature based solutions should be prioritised above all other climate mitigation/adaptation projects
- 15.** Action 43 - All of Galway City should endeavour to be a Low Emission Zone. Develop educational materials and projects detailing the impact of air pollution on human health.
- 16.** Action 47/49 - Introduce a KPI which details a desired percentage reduction in private passenger car journeys.
- 17.** Action 54 - Introduce a 4 day work week and facilitate work-from-home for employees.
- 18.** Action 56 - Introduce a KPI which details a desired percentage reduction of on and on street parking within Galway City, and utilises the spaces for greenery, recreational activities, etc.
- 19.** All Decarbonisation Zone Actions outlined in Table 4-1 should be rolled out to the entirety of Galway City These Actions are wholly beneficial and critical for the local environment, communities, and serve to address climate change and emissions in a multitude of ways. These Actions should not be limited to one area of the city for the sake of finding local solutions “to global problems, such as reducing greenhouse gas emissions, improving air quality, saving energy and reducing waste”. These solutions are already wholly known and understood and the Decarbonisation Zone, whilst an interesting idea, is too little, too late.

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from People Before Profit Galway. In relation to the items raised, Galway City Council responds as follows:

1. Section 1.1

LACAP updated with Met Éireann 2023 weather report referenced, this report was not available at the time of drafting this plan in November 2023.

2. Figure 1.2

Galway City Council highlights Figure 1.2 outlines the spectrum of climate change-related hazards and impacts, loss of biodiversity being one of the “slow onset processes” as an impact of climate change.

3. Section 2.1.1

Galway City Council infers “disruption of supply chains” as a holistic risk to all supply chains.

4. Section 2.1.3

Galway City Council currently engages with front line services during extreme weather events as part of the Galway City Major Emergency Response Plan, Action 11.

5. Section 2.1.3

Clarification of Representative Concentration Pathway (RCP's) utilised in Table 2-2 added to glossary table.

6. Action 1

As outlined in Action 1, Galway City Council has committed to the inclusion of climate Action in all GCC service deliverables and on the work programme for each Strategic Policy Committee (SPC). Furthermore, Galway City Council is committed to implementing climate positive requirements in procurement procedures, Action 7.

7. Action 4

Galway City Council is committed to developing a pathway to a 2050 net zero climate resilient city within the lifetime of this plan, refer to Action 4.

8. Action 6

Galway City Council staff are provided ongoing climate change training through the Climate Action Regional Office, Sustainable Energy Authority of Ireland and other entities as required. These training opportunities are provided also to elected members who also receive further training through the Association of Irish Local Government.

9. Action 8

Galway City Council have prepared the timelines in line with priorities within the organisation and deem the timelines within the draft plan adequate.

10. Action 10

Amended.

11. Action 14

Galway City Council intend to develop a public website in line with Action 16 to where relevant climate Action information will be stored and which will be available to the public.

12. Action 26

Galway City Council have prepared the targets and timelines in line with priorities within the organisation and deem the timelines within the draft plan adequate.

13. Action 37/38

Galway City Council intend to utilise native species as part of Action 37 in internal projects and ensure implementation of same requirements within external permitted projects.

14. Action 42

Galway City Council have developed a climate adaptation plan 2019-2024 and are now developing a Climate Action Plan which provides commitment to investigating potential nature-based solutions projects within the city, Action 7, 27, 42.

15. Action 43

Galway City Council intend to pilot Low Emission Zone to dedicated areas of the city. Any future dedicated zone will be dependent on evaluation of the pilot zones, funding and resources. As stated in Action 44, Galway City Council are committed to supporting the Health Service Executive (HSE) to develop a process to measure health improvement from climate Action projects in Galway City. Action 43 outlines Galway City Councils commitment to develop an Air Quality Improvement Plan for Galway City, educational materials will form part of this action implementation, Action 27.

16. Action 47/49

Action 47 KPI will include count and brief summary of projects delivered annually, for example number of cycling and pedestrian interventions delivered, coupled with annual reporting on delivery progress of the Galway Transport Strategy and comparison of intercensal data in relation to walking or wheeling, cycling, and use of public transport.

17. Action 54

Galway City Council currently offer staff the option to work two days remotely should it be appropriate within their respective department.

18. Action 56

Galway City Council is committing to conducting a modal parking demand management study through Action 56. Where necessary modal parking will be reallocated to other modes inline with the City Development Plan, Green Space Strategy, Tree Strategy, Actions 3, 34, 37.

19. Decarbonisation Zone

In relation to the decarbonization zone plan set out in the draft climate Action plan. Galway City Council identified the decarbonisation zone presented following instruction from the Government Department of Housing & Local Government & Heritage Circular Letter LGSM01-2021, following Action 165 of the Government's Climate Action Plan 2019.

The emissions reduction target for the decarbonisation zone area and the entire city are consistent with each other, that is to reduce emissions by 51% from 2018 levels by 31st December 2030. The purpose of the smaller decarbonisation area being to pilot the Actions identified in a defined area, evaluate their performance and rollout across the city if successful. The decarbonisation zone pathway presented in the draft plan outlines one potential pathway towards achieving this target for the zone. Galway City Council are confident the range of Actions presented will enable achievement of the targets for the decarbonisation zone by 2030 and will enable successful rollout across the city-wide area. Galway City Council emphasises the decarbonisation zone plan presented within the local authority climate Action plan is one such pathway to achieving the 51% emissions reduction required. However, it must be noted resources or funding has not been allocated to Galway City Council from central Government for the delivery of Actions within the decarbonisation zone section of the plan.

Recommendations

Section 1.1

Reference added to Met Éireann 2023 weather report. "Met Éireann's annual climate statement for 2023 stated "warmest year on record by a large margin, above average rainfall"

Table 2-2

Clarification of Representative Concentration Pathway (RCP's) utilised in Table 2-2 added to Glossary. Representative Concentration Pathway Greenhouse gas concentration trajectory adopted by the Intergovernmental Panel on Climate Change (IPCC), Table 2-2 consider the high end 4.5 and 8.5 scenarios to consider the worst-case scenarios in determining the project changes to climate hazards.

RCP added to abbreviations: "RCP Representative Concentration Pathway"

Action 10

Leverage actions from engagement in the EU Missions on Adaptation to Climate Change community of practice, which consists of leaders on climate adaptation in

the European region to strive towards climate resiliency through a cooperative and just approach for the people of **Galway City**.

Submission 19

Submission By	Cllr. John Connolly
Issues Raised	Emissions, Renewable Energy, Decarbonisation Zone, Hydrogen
Submission Summary	
<ol style="list-style-type: none"> 1. The submission suggests for Galway City Council to be ambitious in going beyond the mandated emissions reduction target of 51% vs. 2018 levels by 2030 which is 2,353 tCO₂e to adapt the more ambitious target of 2,000 tCO₂e for Galway City Councils own emissions. 2. Suggests assessing potential for Galway City landfill and composting sites at Headford road for the generation and storage of renewable energy. 3. Suggests extending the decarbonisation zone boundary to include the area between Siobhan McKenna Rd and Circular Rd to include more homes for retrofitting. 4. Suggests Biodiversity and Carbon Sequestration should be added to the list of six priority areas that support the strategic goals that seek to ensure the vision/ mission of the decarbonisation zone is achieved. Suggests there are several locations within, adjacent and outside the Decarbonisation zone that the city council could investigate as suitable locations for the development of Micro-Forests. 5. Suggests the IDA should be invited to become a stakeholder in the process owing to the location of their business park to the North of its current boundary. Suggests the key stakeholders within the Decarbonisation zone should be extended to include the operators of the Commercial centres of the Westside Shopping Centre and the West City Centre office and retail Park. Suggests the reference to University Hospital Galway as a 	

stakeholder for the decarbonisation zone should be extended to the HSE West given the recent grant of planning for a Primary Care Centre

6. Welcomes inclusion of the G2 Galway Hydrogen Hub Consortium as a key stakeholder in the decarbonisation zone plan; however, outlines there is no reference in any of the climate Action plan Actions to hydrogen use. Suggests the climate Action plan should provide more determined support for a positive outcome for the G2 Galway Hydrogen Hub project, proposing that Action 8 should be amended to include direct reference to the GH2 project.

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from Cllr. John Connolly, in relation to the decarbonization zone plan set out in the draft climate Action plan.

1. Galway City Council is committed to meeting the 2030 carbon emissions target of 2,353 tCO₂e, Action 22. However, Galway City Council will endeavour to surpass this target.
2. Galway City Council is committed to delivering an energy master plan for the city, including renewable and energy storage, Action 8, the utilisation of the suggested site will be considered within this plan.
3. Galway City Council identified the decarbonisation zone presented following instruction from the Government Department of Housing & Local Government & Heritage Circular Letter LGSM01-2021, following Action 165 of the Government's Climate Action Plan 2019.
4. The emissions reduction target for the decarbonisation zone area and the entire city are consistent with each other, that is to reduce emissions by 51% from 2018 levels by 31st December 2030. The purpose of the smaller decarbonisation area being to pilot the Actions identified in a defined area, evaluate their performance and rollout across the city if successful. The decarbonisation zone pathway presented in the draft plan outlines one potential pathway towards achieving this target for the zone. Galway City

Council are confident the range of Actions presented will enable achievement of the targets for the decarbonisation zone by 2030 and will enable successful rollout across the city-wide area. Galway City Council emphasises the decarbonisation zone plan presented within the local authority climate Action plan is one such pathway to achieving the 51% emissions reduction required. However, it must be noted resources or funding has not been allocated to Galway City Council from central Government for the delivery of Actions within the decarbonisation zone section of the plan.

Galway City Council is committed to delivering the citywide Green Spaces Strategy in 2024, Action 34, which will concurrently support the decarbonisation zone plan. Further, Galway City Council is committed to delivering the city-wide Tree Strategy which, Action 37, which will further support the decarbonisation zone plan.

5. Galway City Council will engage with all relevant stakeholders throughout the Decarbonisation Zone, Action 18, including all commercial and industrial stakeholders. Agreed to amend University Hospital stakeholder to HSE.
6. Galway City Council recognises the role of the proposed Hydrogen Hub in delivering several of the Actions outlined within the LACAP, and is committed to supporting emerging technologies as outlined with the city development plan:

galwaycity.ie/gccfiles/?r=/download&path=L0RlcGFydG1lbnRzL1BsYW5uaW5nL0RldmVsb3BtZW50IFBsYW4vMjAyMy0yMDI5L0Fkb3B0ZWQgUGxhbi9HYWx3YXkgQ2I0eSBEZXZlbG9wbWVudCBQbGFuIFdyaXR0ZW4gU3RhVGltZW50IDlwMjMgLSAyMDI5LnBkZg%3D%3D

Recommendation

Decarbonisation zone stakeholder table updated: ~~University Hospital Galway~~ replaced with **Health Service Executive (HSE)**. (Image update to HSE)

The ~~hospital~~ **HSE** is a large energy user (GHG permit holder) within the zone, comprising a substantial proportion of emissions in buildings and enterprise sector. The ~~hospital~~ **HSE** is implementing decarbonisation and energy reduction plans.

~~Galway Hydrogen Hub (G2)~~ replaced with Galway Port and proposed Galway hydrogen hub.

(Image update to Port of Galway logo)

This Plan acknowledges the potential to partner with the proposed hydrogen hub. Although the proposed location will be situated at the Port of Galway, outside of the DZ, its implementation will enable the sustainable use of hydrogen within the zone. This **key enabling infrastructure** will assist in the decarbonisation of the more challenging sectors such as industry and transport sectors, in particular.

Submission 20

Submission By	University of Galway Students Union
Issues Raised	Multiple topics
Submission Summary	
<p>The submission outlines several suggestions as detailed below:</p> <ol style="list-style-type: none"> 1. Section 1.2 to be added, nature restoration law should be included here 2. Section 1.3 to be added, put in brackets what LACAP stands for as it is not clearly stated unless you have previous knowledge you might not know 3. Section 3.2.1 to be added, more about youth engagement: where young people feel like they have the power too. One way this could be done is making sure young people are involved in any new committees set up and in the development of the public website to make sure it is accessible for all people. This should also include a list of organisations young people can get involved in. 4. Public, to be added, use more media approach for example Instagram to inform people of Galway of any climate related news in Galway County and more interaction with local climate groups like Fridays for future to inform them. 5. To be added, more information on financially support schemes within circular economy and food waste reduction (e.g. Student pantry, glassary, 	

<p>student second hand store) and make applications more accessible. More detail on how people can apply for the funds.</p> <ol style="list-style-type: none"> 6. Section 3.2.4, to be added, to construct animal bridges to connect green spaces of Galway. 7. Action 37, make sure new plants that are been put down are native. 8. Action 38, develop in conjunction with community groups in these areas 9. Action 40, educate and spread awareness on mediterranean/ plant-based diets, local produced foods and their benefits. Galway city council events/ canteen to be only plant based to lead by example! Strive to have at least one fully plant-based day/ week in every public school and talk to universities about making their cafes that they own to do same. This should be in the county by Q2 2025. 10. Item 44, consider setting up a working group to talk about ways that could be done 11. Section 3.2.5, Action 49, more support so that we can away from cars towards other modes of transport such has buses etc and more work with local bus companies to increase quality of services already in place. 12. Section 3.2.6, Action 61, more composting in inner city collections (Barna Recycling does not offer compost collection in Dominick Street for example). 13. To be added, there needs to be single use coffee cup free city pilot scheme put in place. 14. Action 63, More awareness of around second-hand shops. This could be made into a campaign where every month a few different second-hand shops are advertised.
<p>CE Response and Recommendation</p>
<p>Response</p> <p>Galway City Council acknowledges and welcomes this submission from University of Galway Students Union. In relation to the items raised, Galway City Council responds as follows.</p>

1. Galway City Council are aware of the proposed EU restoration law; however, this is not drafted nor adapted by the European Bodies as of January 2024. Any subsequent adaptation will cascade through Government and possible local authority Actions, Action 4.
2. Refer to introduction section 1.
3. Public engagement sessions were held in November, December with online consultation during same period along with non-statutory online public consultation in September and October also. Young people will be one of the representative groups included in implementing Action 15. Galway City Council also have reporting function towards the Strategic Policy Committee (SPC) with responsibility for Climate Action (Action 1) and the publicly accessible website which will be developed through Action 16.
4. Noted submission refers to County; however, Galway City Council utilises social media to promote local authority services, as part of a wide range of media engagement measures. Galway City Council will seek to engage with relevant stakeholders during the implementation of Action 15. Galway City Council also have reporting function towards the Strategic Policy Committee (SPC) with responsibility for Climate Action (Action 1) and the publicly accessible website which will be developed through Action 16.
5. Galway City Council have launched the community climate Action programme fund which is currently open for applications, Action 32. More information on the fund and application process is available on [GalwayCity - Community Climate Action Programme](#).
6. Galway City Council intend to launch the Galway City Green Space Strategy in 2024, Action 34, and implement Actions within the current Biodiversity Action Plan and new revision of same for 2025-2030, Action 35
7. Galway City Council intend to utilise native species as part of Action 37 in internal projects and ensure implementation of same requirements within external permitted projects.
8. Galway City Council will engage with local stakeholders as part of Action 38.
9. Noted submission refers to County; however, refer to Action 7 and 27 for Galway City Council actions.

10. Galway City Council will engage with relevant stakeholders to develop a pathway to the implementation of Action 44 over the lifetime of this plan.
11. Refer to transport and mobility theme Actions 47-57.
12. Galway City Council will seek to ensure compliance with National Legislative Requirements for waste collection, refer to Action 58 and 60.
13. Galway City Council currently promotes a re-use your coffee cup campaign and has established a deposit and return coffee cup scheme in the city in 2021, [GalwayCity - Use your Mug!](#) refer to Action 1.
14. Refer to Action 27, 58, 60.

Recommendation

No changes to the draft plan.

Submission 21

Submission By	Brendan Mulligan
Issues Raised	Multiple topics
Submission Summary	
<p>The submission outlines several submissions as outlined below:</p> <p>1. Sources of Emissions in Galway City</p> <p>The exclusion of construction sector emissions from the baseline emissions inventory is problematic given their significance. While I note the City Council's commitment to working with Government Departments to establish such baseline emissions, the indication that this will be done within the lifetime of this plan, that is by 2029, lacks the required urgency.</p> <p>2. Section 3.2.2 Energy and Built Environment</p> <p>In Action 23 the Action is to "Support the upgrade of stormwater pipe capacity in collaboration with Uisce Éireann, arising from the completion of the Greater Galway Strategic Drainage Study (GGSGS)". The KPI (Measurement) is "completion of GGSDS by 31.12.2029." I submit that this timeframe is far too long given the likely impacts of Climate Change by 2029. If the GGSDS is only to be</p>	

completed by 2029 this implies the Actions will occur after this date. In Section 9.4 Water Services of the Galway City Development Plan 2023-2029 [page 231] it is written that "In order to provide for the targeted growth in the Galway metropolitan area in the medium and long-term, the preparation of a Greater Galway Area Drainage Strategy will commence in 2022 which will consider future waste water networks and treatment options." It is necessary to complete this study in much shorter timeframe than the 7 years (from 2022-2029) indicated!

3. Section 3.2.3 Communities Resilience and Transition

In Action 30 there are mentions of "water fountains" and "increase rainwater harvesting". The KPI for providing "water fountains" is to "provide 15 public water stations/taps by 31.12.2028". This is a spectacularly unambitious timeframe given that there has been talk of providing water fountains for several years already. This is an easy win and should be expedited. There should be a KPI for "increase rainwater harvesting" but there isn't one. Consideration should be given to the provision of rainwater harvesting, where feasible, in all new dwellings constructed by or for Galway City Council and by the Land Development Agency in Galway city.

4. Section 3.2.4 Environment and Biodiversity

In Action 33 there are references the "Coirib go Cósta - Galway City Flood Relief Scheme" but no mention of commencement or completion dates and no KPI. Given the likely impact of Climate Change there needs to be some urgency about progressing the scheme.

5. Section 3.2.4 Environment and Biodiversity

In Action 38 there is mention of developing "Woodland Management plans for existing GCC woodland". While there is a target date for Barna Wood of 31/12/2024, the KPI includes no target dates for plans for Terryland Forest Park and Merlin Woods. There should be target dates set for each.

6. Section 3.2.4 Environment and Biodiversity

In Action 43 there is an objective to "develop Air Quality Improvement Plan for Galway City". The output from the EPA Air Quality monitor in Eyre Square shows very frequent exceedances of the EU Air Quality Standard for NO₂. There is no

mention in the LACAP of any specific standard for Air Quality that is being aspired to. I submit that in the Air Quality Improvement Plan the WHO Air Quality Guidelines 2021 be aspired to rather than the current EU Air Quality Standards of 2008. The more recent WHO Guidelines 2021 require a higher air quality than the current EU standards which date from 2008.

7. Section 3.2.4 Environment and Biodiversity

In Action 45 there is an objective to "Assess the current herbicide and pesticide usage by Galway City Council" with a view to "remove their application, proactively adopting environmentally-friendly alternative where possible". The target is to "procure alternative process to herbicide and pesticide use for weed treatment by 31.12.2029." This timeframe is far too long given the recognition of the existential threat due to Biodiversity Loss. I submit that there should be an ambitious target set to significantly reduce the usage of both herbicides and pesticides each year with a view to their phasing out a.s.a.p. Appropriate KPIs would be the % reduction in their usage each year.

8. Section 3.2.5 Transport and Mobility

In Action 47 it is stated "Support development of greater accessibility, modal shift and active travel. The KPI is "Number of projects completed annually." I submit that this KPI is neither sufficient nor appropriate. One can envisage a year in which many "projects completed" would be ineffective in achieving either "greater accessibility" or "modal shift". Appropriate KPIs would be the number of people, including those with impaired mobility, accessing public transport and active travel each year and the modal share for walking, cycling and public transport. Other appropriate KPIs would be metres of dedicated public transport lanes and cycle lanes delivered each year. There should be stretching targets included for modal share for walking, cycling and public transport - no targets at all are mentioned.

9. Section 4.5 DZ Actions

In Action DZ 11 there is an objective that "80% of goods-vehicles powered by Hydrogenated Vegetable Oil (HVO) by 2030." From where and from what HVO is sourced are critical considerations. The adoption of HVO needs a holistic consideration in the LACAP. Only HVO produced from a 100% certified waste-

derived feedstock, like used cooking oil, can be considered to be truly sustainable. There may not be sufficient supplies of sustainable HVO to fuel 80% of goods-vehicles. I submit that Action DZ 11 should be re-written as follows "80% of goods vehicles powered by sustainable Hydrogenated Vegetable Oil by 2030".

10. Section 3.2.2 Energy and Built Environment

I submit that a further Action be included namely that all dwellings built by or for Galway City Council and the Land Development Agency in Galway city be designed and built to Passivhaus standards.

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from Brendan Mulligan, in relation to the items raised, our responses are as follows:

1. Sources of Emissions in Galway City

Galway City Council is committed to working with the Government Departments in establishing guidelines and a construction sector emissions baseline for the city within the lifetime of the plan, Action 4, subject to provision and allocation of resources and budget for such.

2. Section 3.2.2 Energy and Built Environment

Comments noted, Galway City Council is committed to working with Uisce Éireann on the upgrade of stormwater pipe capacity during the lifetime of this plan. Galway City Council are committed to working with Uisce Éireann carrying out the Greater Galway Strategic Drainage Study (GGSDS). The aim of the GGSDS is to identify sustainable drainage strategies and projects for the growing Greater Galway Area through to 2080. Furthermore, Uisce Éireann are completing a Drainage Area Plan (DAP) for Galway City and its Metropolitan Area. The DAP's aim is to investigate the hydraulic, environmental, structural and operation issues within the wastewater infrastructure. It will also highlight areas where the network can be improved. UÉ are currently at stage 3 of the DAP, Wastewater Network Risk Assessment and Needs Identification stage. This stage identifies areas within the network where "interventions" will be required, e.g. removing storm water connections from the

wastewater network. These interventions may be actioned in the stage of the DAP. Galway City Council agree to amend Action 23 to include support implementation of the Drainage Area Plan (DAP) along with annual reporting of DAP and GGSDS progress.

3. Section 3.2.3 Communities Resilience and Transition

Galway City Council has commenced the installation of water fountains throughout the city. Galway City Council will review the utilisation of the stations and ramp up the installation of same over the lifetime of the plan.

Galway City Council proposes to include a KPI to conduct a rainwater harvesting feasibility study throughout the lifetime of the plan.

4. Section 3.2.4 Environment and Biodiversity

Galway City Council is actively working on progressing Action 33 to support urgent implementation of the Coirib go Cósta - Galway City Flood Relief Scheme, as per the KPI for this Action, progress is to be reported annually in terms of progress of this LACAP and as required through the project team, programme details added to KPI: in line with stage 1 options development programmed to complete mid-2026 and followed by stage 2 statutory consent application subject to approval by OPW.

5. Section 3.2.4 Environment and Biodiversity

Action 38 KPI target dates for completion of woodland management plans added Terryland Forest Park and Merlin Woods by Q4 2026.

6. Section 3.2.4 Environment and Biodiversity

Action 43 outlines Galway City Council's commitment to developing an Air quality improvement plan for the city and the relevant standards/thresholds will be agreed through consultation with relevant entities. Updates will be provided as part of the reporting process as outlined in Section 5.3 within the plan.

7. Section 3.2.5 Environment and Biodiversity

In Action 45 Galway City Council is committed to trialling alternatives to reduce pesticide reduction over the lifetime of this plan with a view to replacing the use of pesticide by 31.12.2029. Galway City Council recognise the timeline assigned to this action is reflective of the application purpose of pesticide in controlling invasive

species, refer to Action 36 for invasive species management plan, and sourcing an alternative sustainable solution.

8. Section 3.2.5 Transport and Mobility

Action 47 KPI will include count and summary of projects delivered annually, for example number of cycling and pedestrian interventions delivered, coupled with annual reporting on delivery progress of the Galway Transport Strategy and comparison of intercensal data in relation to walking or wheeling, cycling, and use of public transport.

9. Section 4.5 DZ Actions

Galway City Council are the first local authority in the country to develop a framework for the supply of Hydrotreated Vegetable Oil. Galway City Council are committed to utilising sustainable sources and the supplier is required to provide evidence that the fuel complies with: EN15940 Fuel Specifications, EN590, Fuel Quality Directive 2009/30/EC Annex II, Certification to ISCC (International Sustainability & carbon Certification) Standards, 100% renewable source and Renewable Energy Directive (RED), Biofuel Obligation Scheme(BOS). The wording change to "80% of goods vehicles powered by sustainable Hydrogenated Vegetable Oil" by 2030 is approved.

10. Section 3.2.2 Energy and Built Environment

With regard to higher energy performance standards, it is beyond the scope of the local authority to impose standards that are greater than those set out under legislation such as the building regulations (Part L of the Building Regulations transposes the European Energy Performance of Buildings Directive) or those required under Section 28 Ministerial Guidelines. The Climate Action Plan must adhere to national criteria for development. The Council policy as set out in the City Development Plan (Policy 2.4) is to encourage the design of high energy performance buildings through the siting, layout and design of new developments to make best use of renewable and low carbon energy opportunities and to encourage energy efficiency and conservation. It is also policy to support the retrofit and reuse of existing buildings in line with delivery of the proposed National Aggregated Model of Retrofitting. It also explicitly supports the implementation of

the EU Energy Performance in Buildings Directive and the Building Energy Rating Certification (BER). In relation to local authority housing, it encourages high standards of energy conservation and improved energy performance and including for a deep retrofit programme of works (currently under the Energy Efficiency Retrofit Programme).

Galway City Council commits to seek funding for retrofitting an exemplar energy performance building during the lifetime of this plan, as outlined in Action 5.

Recommendation

1. Amend Action 23 to Support the upgrade of stormwater pipe capacity in collaboration with Uisce Éireann, arising from the completion of the Greater Galway Strategic Drainage Study (GGSDS) and support implementation of the Galway Drainage Area Plan (DAP).

Amend Action 23 KPI to

- Annual reporting of DAP progress
- Annual reporting of GGSDS progress
- Completion of GGSDS by 31.12.2029.

2. Amend Action 30 to Development and implementation of infrastructure and technology across the city to reduce water wastage, such as water fountains, ~~and increase rainwater harvesting,~~ in collaboration with Uisce Éireann where necessary. Develop feasibility studies for rainwater harvesting pilots across Galway City Council owned buildings, as possible solutions to implementing water conservation actions. Action 30 KPI to include: Completion of rainwater harvesting feasibility study completion by Q2 2025.

3. Action 33 KPI amended to include: stage 1 options development programmed to complete mid-2026 and followed by stage 2 statutory consent application subject to approval by OPW.

4. Action 38 KPI amended:

- ~~-Woodland management plans developed:~~
- ~~-Barna Wood 31/12/2024, followed by Terryland Forest Park and Merlin Wood.~~
- Implement Barna Wood Management Plan (2022 revision)

5. Amend Action 47 KPI to: Number of projects completed annually **include count and brief summary of projects delivered, for example number of cycling and pedestrian interventions delivered, coupled with annual reporting on delivery progress of the Galway Transport Strategy and compare intercensal data in relation to walking or wheeling, cycling, and use of public transport.**

Submission 22

Submission By	Port of Galway (submission by MKO)
Issues Raised	Critical infrastructure, sustainable urban development and sustainable transport
Submission Summary	
<p>The submission outlines several items under the following headings:</p> <p>1. Critical Infrastructure for Renewable Energy Development</p> <p>The climate Action plan should support ongoing continuation and expansion of the deployment of onshore renewable energy development. Support the role the Port can play in the deployment of offshore renewable energy off the Irish West Coast, in the deployment and service of offshore wind turbines.</p> <p>2. Sustainable Urban Development to Support the Just Transition to an Inclusive, Net Zero and Circular Economy</p> <p>The climate Action plan should support redevelopment of the inner dock lands for sustainable mixed-use development and the extension of the city centre to the waterfront and associated waterfront public spaces. Facilitation of the new mixed-use urban quarter providing for accessible active and sustainable travel modes, enabling travel modal shifts within Galway City.</p> <p>3. Sustainable Transport to Support the Just Transition to an Inclusive, Net Zero and Circular Economy</p> <p>The climate Action plan should support provision of a proposed hydrogen hub and its role in decarbonising Galway City transport</p>	

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from the Port of Galway. In relation to the items raised, below are Galway City Council's responses:

1. Critical Infrastructure for Renewable Energy Development

Galway City Council recognises and supports the role of the Port of Galway for renewable energy development as outlined in the City Development Plan 2023-2029:

galwaycity.ie/gccfiles/?r=/download&path=L0RlcGFydG1lbnRzL1BsYW5uaW5nL0RldmVsb3BtZW50IFBsYW4vMjAyMy0yMDI5L0Fkb3B0ZWQgUGxhbi9HYWx3YXkgQ2I0eSBEZXZlbG9wbWVudCBQbGFuIFdyaXR0ZW4gU3RhdGVtZW50IDlwMjMgLSAyMDI5LnBkZg%3D%3D

2. Sustainable Urban Development to Support the Just Transition to an Inclusive, Net Zero and Circular Economy

Galway City Council recognises and supports the role of the Port of Galway in delivering sustainable urban development to support the just transition to an inclusive, net zero and circular economy, particularly with the recognition of the inner harbour as a strategic location for regeneration as outlined within the aforementioned City Development Plan 2023 – 2029:

galwaycity.ie/gccfiles/?r=/download&path=L0RlcGFydG1lbnRzL1BsYW5uaW5nL0RldmVsb3BtZW50IFBsYW4vMjAyMy0yMDI5L0Fkb3B0ZWQgUGxhbi9HYWx3YXkgQ2I0eSBEZXZlbG9wbWVudCBQbGFuIFdyaXR0ZW4gU3RhdGVtZW50IDlwMjMgLSAyMDI5LnBkZg%3D%3D

3. Sustainable Transport to Support the Just Transition to an Inclusive, Net Zero and Circular Economy

Galway City Council recognises and supports the role of the Port of Galway in delivering sustainable transport to support the just transition to an inclusive, net zero and circular economy. Galway City Council recognises the role of the proposed hydrogen hub at the Port of Galway in delivering several of the Actions outlined within the LACAP, and is committed to supporting emerging technologies

as outlined with the city development plan, furthermore, Action 8 provides for renewable energy storage strategy development within the lifetime of the plan.

galwaycity.ie/gccfiles/?r=/download&path=L0RlcGFydG1lbnRzL1BsYW5uaW5nL0RldmVsb3BtZW50IFBsYW4vMjAyMy0yMDI5L0Fkb3B0ZWQgUGxhbi9HYWx3YXkgQ2l0eSBEZXZlbG9wbWVudCBQbGFuIFdyaXR0ZW4gU3RhdGVtZW50IDlwMjMgLSAyMDI5LnBkZg%3D%3D

Recommendation

No change to draft plan.

Submission 23

Submission By	Centre For Environmental Living and Training (CELT) Galway
Issues Raised	Multiple topics
Submission Summary	
<p>The submission outlines several items under the following headings:</p> <ol style="list-style-type: none"> 1. Need ongoing Galway City Council support for development of the nature and community based interventions such as the Galway National Park City, Healthy Green Space initiatives, Third Space Galway, Permaculture in the City Projects, CVG wildflower projects, Community Gardens, Allotments etc. 2. Leadership is very important, staff and public representative awareness and training on Climate Science, Regenerative Culture Design and Ecosystems understanding for nature protection and restoration within the Local Authority is imperative and should be mandatory. Climate Change & Ecosystem Collapse are extremely urgent issues. Without massive system change we cannot hope to achieve our targets and build a safe future for our children. Our local leaders need to be aware we can no longer afford business as usual 3. Roll out a public awareness campaign including information on the science of Climate Change & Ecosystems understanding to include Biodiversity, 	

Regenerative Living, CCF, Permaculture, Sustainable Woodland & Land Use Management, and explain why green policies are imperative. Empowering people with an educational program that is inclusive is fundamental. People need to know the steps and be supported to take to transition individually and collectively to a regenerative, zero emissions, economy and environment and for a fair and just transition.

5. Consider the uncertainties and risks around tipping points and feedback loops when educating people about Climate Change. Scientists now believe that there are 5 tipping points which could be activated within the Paris Agreement targets of 1.5 or 2C. Consider the exponential nature of climate change, and the escalation of extreme weather events across the world with disastrous consequences for communities. Climate change is escalating and accelerating. Discuss the ramifications of this science within the LACAP. Knowledge of the science is critical as it highlights the urgency for decision makers.

6. The Local Authority should promote diets and lifestyles that have lower carbon footprints. With this in mind both active travel and local sourced organic plant based diets should be promoted.

7. Education for agricultural stakeholders on organics & agroforestry should be rolled out

8. All public catering events at Local Authority level should promote local organic where possible, plant based diets, and all catering should be meat free. This would be in line with section 4.1 on Green Public Procurement (in the LACAP). This would be an important way for the Local Authority to lead by example.

9. Do not develop facilities such as data centres in the city or county. These are extremely energy intensive and will cause us to miss our energy targets/budgets.

10. Galway City Council can endorse the Fossil Fuel Non-proliferation Treaty and be part of a movement that puts pressure on the central government to also sign the Treaty. These are important leadership steps, which could make the Local Authority a climate leader. 100 cities and local governments across the world have already endorsed the Treaty

- 11.** Support and encourage the development of local energy co-ops to enable and facilitate communities to develop skills and capacity to initiate locally based community owned and community led energy solutions, including the option of the coop use of public land for the generation of renewable energy alongside supporting community ownership of local microgeneration projects and the new energy grid capacity developments coming on stream.
- 12.** Building and Planning regulations - initiate and support One Planet Living developments and community innovation projects such as is supported in Wales by the The One Planet Council. This forward-thinking planning policy provides a genuinely affordable and sustainable way for people to live and work on their own land, bringing social, economic and environmental benefits. It was adopted by the Welsh government in 2011 as part of its One Wales: One Planet scheme.
- 13.** Develop a light rail system for Galway.
- 14.** Explore and introduce options for free travel schemes to incentivise public switch from cars
- 15.** Create safe cycling and walking infrastructure- safe routes to schools for all children
- 16.** Adopt best practice when designing cycling and walking infrastructure, take your lead from countries that have well developed cycling infrastructure
- 17.** Build networks of cycle paths to make cycling a true and safe alternative to driving. Follow the hierarchy of transport when allocating road space, prioritise walking and cycling infrastructure above roads and fast track those projects, connect cycleways with other public transport such as buses and train stations and provide adequate parking for bikes.
- 18.** Do not build the ring road, the emissions cost would be enormous and it will lock us into increasing emissions. Use the money to transform Galway and make it a city where active travel and public transport is the easiest way to get around.
- 20.** Make neighbourhoods more permeable allow more pedestrian movement through spaces so people can access areas without using cars

- 21.** Pedestrianisation of towns & villages with 30kmph speed limits and French style crossings that are red for cars by default
- 22.** Ensure safe pedestrian and cycle access to all train stations and bus stops
- 23.** Covered, safe, protected bus shelters in all locations with a regular service. Pull in areas at the side of road for buses to stop safely and allow traffic past on the right hand side.
- 24.** On the Climate Action Fund Action CP1.1, the fund is not sufficient to allow Galway to transition to a green Economy, this shows a lack of ambition of central government. It is very important to strengthen local authorities to allow them to take more Action independently of the central government. A lot of community groups struggle with access to land and staffing costs; this is often the main barrier to community group projects, specifically projects related to the environment. The fund does not address this issue.
- 25.** Galway City Council should immediately publicise an uptodate audit of all public land and empty buildings, and make it accessible and visible to local communities, and allocate to communities to facilitate social enterprises and Green Transition Cooperative Projects, such as Food, Fibre and Fuel production, neighbourwoodlands for coppicing, projects and as outdoor educational classrooms, community repair cafes, library of things etc
- 26.** Prioritise reduce and reuse strategies rather than recycling which has limited value and can in fact be detrimental by locking in continued use of single use plastic.
- 27.** Promote water refill stations
- 28.** Promote reusable keep cups in general and within county council facilities
- 29.** Promote libraries of stuff to allow people to share items such as gardening tools and equipment.
- 30.** Work with shops to promote refill stations and to reduce plastic packaging
- 31.** Set targets on reduction of plastic waste streams for businesses in Galway.
- 32.** Support Co-Operatives and set targets for Co-ops in the county. Co-ops can help us to meet local production needs for fuel, food, energy, clothing, packaging,

eco-housing etc. Co-ops also support small farmers and businesses and make the food system more resilient.

33. Only support the development of new businesses that are regenerative and non extractive

34. Adopt a Rights of Nature Motion within the Council. A Rights of Nature Motion is currently before the Government as a recommendation from the Citizens Assembly to halt Biodiversity Loss, and needs to urgently be adopted and taken on board in national and local Council plans, practices and developments. Rights of Nature is a concept, or way of thinking, about how we can redefine our relationship with the natural world. By building on this relationship with reciprocity and care we can learn (or remember) how to live in harmony with nature. There are different spheres in which this can be done - from education and engagement at community level, to changes in local laws, policy and planning. This would be a key way to build environmental protection into all decision making and raise awareness about the Nature/biodiversity crisis that we are facing. This would educate people and give recognition to the inherent rights of our natural ecosystems to flourish and thrive, to not be destroyed, damaged or polluted and of our inherent interdependence on healthy ecosystems in order to survive.

35. Carry out an Ecological audit of Local Authority land as outlined

36. Work closely with and be open to listening to and learning from community groups who are already doing important environmental work on the ground.

37. Support Regenerative Bioregional plans to incorporate community gardens and allotments in every village and town, alongside community supported agriculture projects alongside nurseries and neighbourwoods cooperatives for local community coppicing projects for local fuel, fibre, natural crafts production

38. Work to support best practice management of hedgerows and woodland in the county, limit unnecessary cutting of these vital habitats. Consider working with community groups on expanding areas of native woodland and high nature value habitats on all council land. Promote planting Trees, Food Forests, Agroforestry and Sustainable Woodland and Land Use Management within all City Council departments and to all stakeholders

39. Plant more trees, native hedgerows and orchards on all publically owned land and sites. Increase Edible Landscaping & Forest Gardens where possible and increase annual afforestation rates and promote forest management initiatives in both public and private forests

40. Continue to support wild zones and wild flower meadows, utilising only locally grown seed, trees and pollinator friendly planting schemes. Use perennial pollinator plants as these are cost efficient and more resilient to environmental stresses.

41. Utilise best practice across all public spaces, educating council staff and all community bodies on regenerative and permaculture practices, sustainable woodland management and nature based solutions in the care and maintenance of the Public Authority.

42. Introduce a pesticide ban in the county.

43. Support Regenerative Bioregional Multi Stakeholder Landscape Partnership Projects

44. Galway City Council should have Nature Based Solutions (NBS) at the forefront of their adaptation and mitigation strategies for flooding and other climate driven risks. Successful projects such as the Salthill Sand Dune Project should be proliferated.

45. Support food security and sustainable organic local food production and ensure a safe and healthy environment that is resilient to the effects of climate change. The LACAP needs to address food security and food poverty in its area. We want everyone in Galway City to have access to affordable, locally produced, nutrient dense, chemical-free food.

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from Centre For Environmental Living and Training (CELT) Galway, in relation to the items raised, responses below:

- 1.** Comments noted, refer to Action 27.
- 2.** Comments noted, refer to Action 1, 17.
- 3.** Comments noted, refer to Action 16, 27.
- 4.** Comments noted, refer to Actions 1, 3, 15 and 27
- 5.** Comments noted, refer to Action 9.
- 6.** Comments noted, refer to Action 27.
- 7.** Comments noted, refer to Action 27.
- 8.** Comments noted, refer to Action 7.
- 9.** Comments noted, refer to Action 3.
- 10.** Comments noted, refer to Action 5.
- 11.** Comments noted, refer to Action 27.
- 12.** It is beyond the scope of the local authority to impose standards that are greater than those set out under legislation such as the building regulations (Part L of the Building Regulations transposes the European Energy Performance of Buildings Directive) or those required under Section 28 Ministerial Guidelines. The Climate Action Plan must adhere to national criteria for development. The Council policy as set out in the City Development Plan (Policy 2.4) is to encourage the design of high energy performance buildings through the siting, layout and design of new developments to make best use of renewable and low carbon energy opportunities and to encourage energy efficiency and conservation. It is also policy to support the retrofit and reuse of existing buildings in line with delivery of the proposed National Aggregated Model of Retrofitting. It also explicitly supports the implementation of the EU Energy Performance in Buildings Directive and the Building Energy Rating Certification (BER). In relation to local authority housing, it encourages high standards of energy conservation and improved energy performance and including for a deep retrofit programme of works (currently under the Energy Efficiency Retrofit Programme).
- 13.** Comments noted, refer to Action 48.
- 14.** Comments noted, refer to Action 47, 49. Galway Transport Strategy interventions: a fundamental shift is needed towards sustainable travel, reducing the dependency on the private car and taking action to make Galway more accessible and connected, enhancing quality of life within the City for all.

To address these problems, Galway City Council's (GCC) strategic objectives for transport are: to promote and encourage sustainable transport, to manage the traffic in a way which maximises mobility and safe movement, to maintain and develop/upgrade Infrastructure. GCC are working with An Taisce on The Safe Routes to School (SRTS) programme. The Safe Routes to School (SRTS) programme is working with schools and local authorities across Ireland to support improvements to front of school environments as well as routes to school. The School Street at Scoil Iognáid for example has been in operation since May 2022, starting initially as an informal school street with parents / guardians asked to voluntarily avoid driving to the school at school start and finish times and building up to a formal school street with statutory signage in place. The School Street has been successful in reducing issues facing residents previously, such as school traffic blocking entrances to homes, and contributed to an increase in students walking, cycling, and scooting to school and is the first city school street.

15. GCC follows the National Standard 2023 Cycle Design Manual. The new manual draws on the experience of delivering cycling infrastructure across Ireland over the last decade, as well as learning from international best practice, and has been guided by the need to deliver safe cycle facilities for people of all ages and abilities.
16. The GTS sets out a proposal for a city wide quality cycle network. This network is intended to maximise coverage and increase dedicated cycle priority measures across the city linking with public transport hubs. Galway City Council website has an online map displaying over 1,040 on-street public cycle parking spaces available in the City. The Galway City cycle parking map was developed to show where over 1,040 on-street cycle parking spaces are available in the city, and will assist Galway City Council to identify locations where additional cycle parking would be beneficial. The map will be updated as additional cycle parking is added, or where stands are relocated.
17. Refer to action 47, 48, 49.
20. As per the Galway Transport Strategy (GTS), Action 47, a number of projects have been completed to increase permeability routes, examples of this being at the Eglington Canal, Millers Lane and the South Doughiska cycle lanes. Other

routes are currently being examined. In relation to walking, one of the Strategic Aims of the GTS is "to increase the quality, comfort and safety of the pedestrian facilities." The projects in the GTS prioritise walking infrastructure as a core principle, while also seeking to make both cycling and public transport more attractive to the public. This is part of the overall aim which is to remove non-essential motorised traffic from the city centre area.

- 21.** The GTS recognises that the quality of the pedestrian environment is an important characteristic which influences residents, commuters, tourists and shoppers in their choice of destination and main mode of travel. This is detailed in the GTS appendix G Public Realm Proposals
<https://www.galwaycity.ie/galway-transport-strategy>
- 22.** As per the Galway Transport Strategy (GTS), works have commenced at Galway Train Station to enhance accessibility.
- 23.** GCC follows the National Standard, Design manual for Urban Roads and Streets in all upgrades and new projects. This is detailed in the GTS appendix D Public Transport Infrastructure Development
<https://www.galwaycity.ie/galway-transport-strategy>
- 24.** Galway City Council recognises the initial release of funding is not sufficient to complete the transition to a sustainable resilient city; however it is understood there will be further releases of funding in following years which Galway City Council will implement to support community organisations, Action 5, 28, 27, 32.
- 25.** Comments noted, refer to Action 25.
- 26.** Comments noted, refer to Actions 58 and 60.
- 27.** Comments noted, refer to Action 30.
- 28.** Submission references the "county", Galway City Council currently promotes a re-use your coffee cup campaign and has established a deposit and return coffee cup scheme in the city in 2021, refer to Action 1.
- 29.** Comments noted, refer to Action 60.
- 30.** Comments noted, refer to Action 60.
- 31.** Comments noted, refer to Action 58.
- 32.** Submission references the "county", refer to action 27 which refers to promotion of Climate Action in Galway City.

33.	Comments noted, refer to Action 33.
34.	Galway City Council are aware of the proposed EU restoration law; however, this is not drafted nor adapted by the European Bodies as of January 2024. Any subsequent adaptation will cascade through Government and possible local authority Actions, Action 4.
35.	Comments noted, refer to Action 34.
36.	Comments noted, refer to Action 27 and 15.
37.	Comments noted, refer to Action 40.
38.	Submission references the "county", refer to action 34, 35, 37 and 38 for Galway City.
39.	Comments noted, refer to Action 37, 38, 34.
40.	Comments noted, refer to Action 34 and 35.
41.	Comments noted, refer to Action 34 and 35.
42.	Submission references the "county", refer to Action 45 for Galway City.
43.	Comments noted, refer to Action 27 for promoting climate action throughout the City.
44.	Comments noted, refer to Action 15, 27, 32, 42
45.	Comments noted, refer to Action 27, 40
Recommendation	
No change to the draft plan.	

Submission 24

Submission By	Philip O'Toole
Issues Raised	Multiple topics
Submission Summary	
The submission outlines	
1. Grazing on public lands	
The Council should immediately cease its leasing of land for grazing by cattle and sheep at its sites at Castlegar, Carrowmoneash, Upper Dangan, Ballyburke,	

Ballyloughane, etc. Agriculture was responsible for 38.6% of Irish carbon emissions in 2022, the vast majority of this from cattle and sheep. While it is a small portion of the Council's emissions, it sets an extremely bad example - urban councils should not be facilitating livestock farming with its concomitant carbon and methane emissions, run-off, and high land and water requirements.

2. Tree planting

There should be a large-scale tree planting scheme on Council owned land, consisting of native broadleaf species. This would turn carbon sources (livestock etc) into carbon sinks. The council should also encourage private landowners and businesses within the City limits to plant native trees on their land wherever possible to act as carbon sinks, and also aid in soil stabilisation and flood mitigation.

The Council should expand its use of wildflower and uncut grass areas, and encourage private landowners to do the same, and plant trees on a portion of existing grassland to improve its carbon sequestration and biodiversity.

3. Groundwater flood risk

The draft plan states that projections in groundwater flooding are not currently available, but then classifies the likelihood as 'Rare'. This needs to be investigated further or classified as a risk of unknown magnitude.

4. Climate festival

The idea of establishing a climate festival seems to be an unnecessary distraction and possible poor use of public funds. What would its own carbon footprint be?

5. General comment

The Climate Plan needs to contain more concrete steps to reduce carbon emissions from the largest sources as identified in the plan - residential housing, industry and transport.

6. Residential

Require all new housing to be A rated, have at least 4kWh solar per unit, and heat pumps.

Many existing homes in the DZ belong to low-income households which would struggle to bring their homes to B2 standards, even with generous grants.

New multi-unit developments to have shared ground-source heat pumps for greater efficiency and economies of scale.

Shift to continental style “build up rather than out” to maximise heat island effects, reduce travel distances and increase close community living.

Strict enforcement of smokeless fuel laws. People are still burning turf and coal in Galway city.

Council to survey and compile BER ratings database to identify and prioritise insulation programme for both Council and non-Council owned residential buildings.

7. Industry

Require all rate-paying businesses in Galway to provide BER assessments for their premises, energy usage statistics and change the rate assessment mechanism to use these measurements in comparison with best-in-class business practices in similar industries internationally. More efficient businesses will pay less than those wasting energy.

8. Transport

In the draft plan, the DZ transport emissions reduction includes the switch to HVO fuels for LGVs and HGVs. HVO fuels (Hydrotreated Vegetable Oils). There is intense debate over the carbon cost of using such fuels, with a recent study showing the carbon cost exceeds any displacement from fossil fuels. (Merfort et al., Nature Climate Change, 2023.) It is difficult to see how anything other than EV transport where the electricity is from renewable sources is beneficial.

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from Philip O'Toole, in relation to the items raised, Galway City Council's responses are as follows:

1. Grazing on public lands

Galway City Council is committed to engaging with all stakeholders in relation to climate action, refer to Action 27.

2. Tree planting

Galway City Council intend to launch the Galway City Green Space Strategy in 2024, Action 34, and implement Actions within the current Biodiversity Action Plan and new revision of same for 2025-2030, Action 35 along with the development of a tree strategy for Galway City Action 37.

3. Groundwater flood risk

Galway City Council deem groundwater flooding to be a rare and negligible risk for Galway City as part of our climate change risk assessment, the dominant flood risk for Galway City is costal, pluvial and rover flooding. The climate risk assessment referenced in the plan was developed in preparation for this inaugural climate Action plan, Galway City Council is committed to updating the climate change risk assessment on a continuous basis as required.

4. Climate festival

Galway City Council is committed to the facilitation and delivery of a climate festival which may be an inclusion as part of already arranged events ongoing within the city, Action 19, to facilitate knowledge sharing a spectrum of climate Action to homes and businesses across the city, Action 27.

5. General comment

Through the implementation of this LACAP, Galway City Council is committed to supporting all sectors to meet 2030 carbon emissions targets, Action 27.

6. Residential

With regard to higher energy performance standards, it is beyond the scope of the local authority to impose standards that are greater than those set out under legislation such as the building regulations (Part L of the Building Regulations transposes the European Energy Performance of Buildings Directive) or those required under Section 28 Ministerial Guidelines. The Climate Action Plan must adhere to national criteria for development. The Council policy as set out in the

City Development Plan (Policy 2.4) is to encourage the design of high energy performance buildings through the siting, layout and design of new developments to make best use of renewable and low carbon energy opportunities and to encourage energy efficiency and conservation. It is also policy to support the retrofit and reuse of existing buildings in line with delivery of the proposed National Aggregated Model of Retrofitting. It also explicitly supports the implementation of the EU Energy Performance in Buildings Directive and the Building Energy Rating Certification (BER). In relation to local authority housing, it encourages high standards of energy conservation and improved energy performance and including for a deep retrofit programme of works (currently under the Energy Efficiency Retrofit Programme).

Galway City Council commits to seek funding for retrofitting an exemplar energy performance building during the lifetime of this plan, as outlined in Action 5.

7. Industry

Galway City Council is committed to supporting all rate-paying businesses to meet 2030 carbon emissions targets through various innovative solutions, Action 20 and 27.

8. Transport

Galway City Council understand that Hydrotreated Vegetable Oil is not “zero emission” however deem that it is a suitable transitional fuel as we strive for 2030 targets. Hydrotreated Vegetable Oil is intended to be utilised for vehicles that cannot yet be changed over to fully zero emissions vehicles such as Heavy Goods vehicles. As technology improves and additional stock becomes available it is intended that further iterations of the plan will strive for net zero emissions to align with national targets set out for 2050.

Recommendation

No change to the draft plan.

Submission 25

Submission By	Gerard Leahy
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Issues Raised	Multiple topics
Submission Summary	
<p>The submission comments on the following items:</p> <ol style="list-style-type: none"> 1. Climate change causes <p>Accepts that all local authorities are required to produce these plans under the Climate Action Plan. This is based on legislation which was enacted to placate the Green Party and the targets set out are simply not achievable. Furthermore, there is a growing realisation that achieving net zero CO2 by 2050 would bankrupt many countries and reduce many populations to poverty. Many scientists say that CO2 is not the driver of climate. These scientists attribute changes to the Earth's climate to natural factors such as changes to the Earth's magnetic field and solar variances. There are also serious issues with the data used in baseline temperatures and indeed the methods of data collection used today. The climate models in use have shown themselves to be seriously and consistently incorrect. Even if CO2 were the driver of climate, anything Ireland or Europe does will be negated several times over by countries like China and India.</p> 2. Support for measures to alleviate flooding in the city <p>Galway has often been described as shaped like a half saucer, with the areas around Claddagh, Spanish Arch, Flood St, being very low lying and prone to flooding. Areas like Salthill are also vulnerable in certain weather conditions. Any plan which works to alleviate this flooding can only be a good thing.</p> 3. Urban water supply <p>The uprating of the urban water supply system is also welcome as this will build resilience against future droughts. Given our very high annual rainfall, I think that further resilience could be obtained by enhancing storage capacity</p> 4. Cost of Actions 	

Reducing CO2 emissions is a very expensive process and would be hugely disruptive to peoples' lifestyles

5. Retrofitting

Retrofitting of houses is growing in cost. There are problems getting suitably skilled workers. The use of Council funding to do this would result in financial shortfalls elsewhere. The cost makes it prohibitive for people to retrofit their homes. Minister Ryan waxes lyrical about low cost loans but many simply cannot afford to expend huge money, borrowed or otherwise, to carry out this work. Any loan taken out would be another burden on the already hard pressed populus. Our politicians will crow about the benefits but these are exaggerated as such homes are uncomfortable during hot weather. We are not told that hermetically sealed homes are associated with growing instances of asthma. It is politically expedient to blame this on solid fuel and vehicle exhausts

6. Transport

Another area is transport. Much is made of the roll out of cycling, walking and public transport infrastructure and the plan envisages a 50% reduction in car use in one area, with the notion of inflicting this on the remainder of Galway at a later date. Decision makers need to realise that the weather in Galway is most inconducive to walking or cycling. We get 234 wet days per annum on average and rainfall is trending upwards. The high level of assaults make it unsafe to walk at night. This includes walking to/from bus stops and anti social behaviour on buses is increasing in Ireland. These factors all contribute to car dependency.

I note the plan for an all-electric bus in part of the city. This is beyond the control of the City Council. I will make a few comments on this. These buses cost about twice the price of diesel engine models. The technology is also underdeveloped and is vulnerable to fire. These fires burn at very high temperature and quickly engulf the vehicle, making it nearly impossible for those on board to escape and are very difficult to control. However, newer, better, more cost effective and safer technology is being developed and is

expected to come to market by 2027/28. This will make electric cars more affordable and steadily remove motoring from any climate concerns

7. Feasibility

Many will accept climate concerns and climate action in the abstract. However, when costs and/or lifestyle restrictions are at play, it is a different story. The measures which would be required to even come near to achieving the unrealistic targets are far beyond what most people will accept

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from Gerard Leahy in relation to the items raised, responses below:

1. Galway City Council is committed to reducing its emissions and increasing its use of renewable energy in order to meet 2030 targets and establish a pathway to achieving net zero emissions by 2050.
2. Comments noted. See Actions 10, 27, 32, 33 of the draft plan.
3. Comments noted. See Actions 23, 27, 30, 42 of the draft plan.
4. Comments noted. See Actions 5, 24, 27, 28, 32, 50 of the draft plan.
5. Comments noted. See Actions 5, 24, 27, 28, 32, 44 of the draft plan.
6. Galway City Council is committed to supporting emerging technologies as outlined with the city development plan.
7. Galway City Council is committed to supporting communities, businesses and home owners on their transition through knowledge sharing, funding supports and other measures as outlined throughout the draft plan.

Recommendation

No change to the draft plan.

Submission 26

Submission By

Third Space Galway

Issues Raised	Multiple topics
Submission Summary	
<p>The submission outlines several items under the following headings:</p> <ol style="list-style-type: none"> 1. Need Galway City Council support for Third Space Galway, Permaculture in the City Projects, alongside the Galway National Park City and Healthy Green Space initiatives, we wish to have Permaculture aims, principles and ethics included as a design methodology within Galway City Council and incorporated as a working methodology within the Galway City LACAP. We wish to see Galway City Council integrate our Permaculture in the City vision, as part of its strategy to address climate change and ecological collapse, integrating the Permaculture ethics of earth care, people care and fair share. Permaculture is a movement that has widespread global recognition and support from the UN in recognition of its role in community resilience, Climate Change Adaptation and Mitigation. 2. Leadership is extremely important, staff awareness and training within the Local Authority is imperative and should be mandatory. Climate change Action is urgent. Without massive system change we cannot hope to achieve our targets and build a safe future for our children. Our local leaders need to be aware of that. We can no longer afford business as usual and our local leaders need to know our communities need the right supports to transition to a new way of life. 3. Roll out a public awareness campaign including information on the science of Climate Change, Ecosystems understanding, permaculture and nature based solutions explaining why green policies and an environmentally friendly way of life are imperative. Empowering people with an educational program that is inclusive is fundamental. People need to know the steps to take to transition individually and collectively to a regenerative, zero emissions, eco friendly economy and way of life. 5. Consider the uncertainties and risks around Tipping points and feedback loops when educating people about Climate Change. Scientists now believe that there are 5 tipping points which could be activated within the Paris Agreement targets of 1.5 or 2C. Consider the exponential nature of climate change, and the escalation of extreme weather events across the world with disastrous consequences for 	

communities. Climate change is escalating and accelerating. Discuss the ramifications of this science within the LACAP. Knowledge of the science is critical as it highlights the urgency for decision makers.

6. The Local Authority should promote local organic diets and lifestyles that have lower carbon footprints. With this in mind both active travel and locally sourced plant based diets should be promoted.

7. Education for agricultural stakeholders should be rolled out.

8. All public catering events at Local Authority level should promote local organic where possible, plant based diets, and all catering should be meat free. This would be in line with section on Green Public Procurement (in the LACAP). This would be an important way for the Local Authority to lead by example.

9. Do not develop facilities such as data centres in Galway or other extremely energy intensive industries which will cause us to miss our energy targets/budgets.

10. Galway City Council can endorse the Fossil Fuel Non-proliferation Treaty and be part of a movement that puts pressure on the central government to also sign the Treaty. These are important leadership steps, which could make the Local Authority a climate leader. 100 cities and local governments across the world have already endorsed the Treaty.

11. Support and encourage the development of local energy co-ops to enable and facilitate communities to develop skills and capacity to initiate locally based community owned and community led energy solutions, including the option of the coop use of public land for the generation of renewable energy alongside supporting community ownership of local microgeneration projects and the new energy grid capacity developments coming on stream.

12. Building and Planning regulations - initiate and support One Planet Living developments and community innovation projects such as is supported in Wales by the The One Planet Council. This forward-thinking planning policy provides a genuinely affordable and sustainable way for people to live and work on their own land, bringing social, economic and environmental benefits. It was adopted by the Welsh government in 2011 as part of its One Wales: One Planet scheme.

- 13.** Develop a light rail system for Galway
- 14.** A free electric transport system to support the switch from car.
- 15.** Create safe cycling and walking infrastructure- safe routes to schools for all children
- 16.** Adopt best practice when designing cycling and walking infrastructure, take your lead from countries that have well developed cycling infrastructure
- 17.** Build networks of cycle paths to make cycling a true and safe alternative to driving. Follow the hierarchy of transport when allocating road space, prioritise walking and cycling infrastructure above roads and fast track those projects, connect cycleways with other public transport such as buses and train stations and provide adequate parking for bikes.
- 18.** Do not build the ring road, the emissions cost would be enormous and it will lock us into increasing emissions. Use the money to transform Galway and make it a city where active travel and public transport is the easiest way to get around.
- 19.** Discourage the use of SUVs in built up areas. These cars are known to have higher emissions associated with them and they take up more space.
- 20.** Make neighbourhoods more permeable allow more pedestrian movement through spaces so people can access areas without using cars
- 21.** Pedestrianisation of towns & villages with 30kmph speed limits and French style crossings that are red for cars by default
- 22.** Ensure safe pedestrian and cycle access to all train stations and bus stops
- 23.** Covered, safe, protected bus shelters in all locations with a regular service, pull in areas at the side of road for buses to stop safely and allow traffic past on the right hand side.
- 24.** On the Climate Action Fund Action CP1.1 The fund is not sufficient to allow Galway to transition to a green Economy, this shows a lack of ambition of central government. It is very important to strengthen local authorities to allow them to take more Action independently of the central government. A lot of community groups struggle with access to land; this is often the main barrier to community group projects, specifically projects related to the environment. The fund does not

address this issue. A lot of community groups struggle with accessing resources to pay staff to manage projects, this too is sadly lacking in this fund;

25. Galway County Council should immediately publicise an up to date audit of all public land and empty buildings, and make it accessible and visible to local communities, and allocate to communities to facilitate social enterprises and Green Transition Cooperative Projects, such as Food and Fuel production, community repair cafes, library of things etc.

25. Prioritise reduce and reuse strategies rather than recycling which has limited value and can in fact be detrimental by locking in continued use of single use plastic.

27. Promote water refill stations

28. Promote reusable keep cups in general and within county council facilities

29. Promote libraries of stuff to allow people to share items such as gardening tools and equipment.

30. Work with shops to promote refill stations and to reduce plastic packaging

31. Set targets on reduction of plastic waste streams for businesses in Galway.

32. Support Co-Operatives and set targets for Co-ops in the county. Co-ops can help us to meet local production needs for fuel, food, energy, clothing, packaging, eco-housing etc. Co-ops also support small farmers and businesses and make the food system more resilient.

33. Only support the development of new businesses that are regenerative and non extractive

34. Adopt a Rights of Nature Motion within the Council. A Rights of Nature proposal by the Citizens Assembly as a recommendation to halt Biodiversity loss, is currently before the Government for Action and needs to urgently be adopted and taken on board in all national and local Council plans, practices and developments. Rights of Nature is a concept, or way of thinking, about how we can redefine our relationship with the natural world. By building on this relationship with reciprocity and care we can learn (or remember) how to live in harmony with nature. There are different spheres in which this can be done - from education and

engagement at community level, to changes in local laws, policy and planning. This would be a key way to build environmental protection into all decision making and raise awareness about the Nature/biodiversity crisis that we are facing. This would educate people and give recognition to the inherent rights of our natural ecosystems to flourish and thrive, to not be destroyed, damaged or polluted and of our inherent interdependence on healthy ecosystems in order to survive.

35. Carry out an Ecological audit of Local Authority land as outlined in LN2

36. Work closely with and be open to listening to and learning from community groups who are already doing important environmental work on the ground.

37. Support Regenerative Bioregional plans to incorporate community gardens and allotments in every village and town, alongside community supported agriculture projects alongside nurseries and neighbourwoods cooperatives for local community coppicing projects for local fuel and fibre production

38. Work to support best practice management of hedgerows and woodland in the county, limit unnecessary cutting of these vital habitats. Consider working with community groups on expanding areas of native woodland and high nature value habitats on all council land.

39. Plant more trees and native hedgerows on all publically owned land and sites! Continue to support wild zones and wild flower meadows, utilising only locally grown seed, trees and pollinator friendly planting schemes. Use perennial pollinator plants as these are cost efficient and more resilient to environmental stresses.

40.Continue to support wild zones and wild flower meadows, utilising only locally grown seed, trees and pollinator friendly planting schemes. Use perennial pollinator plants as these are cost efficient and more resilient to environmental stresses.

41. Utilise best practice across all public spaces, educating council staff and all community bodies on regenerative and permaculture practices, sustainable woodland management and nature based solutions in the care and maintenance of the Public Authority. Create Community Neighbourhoods where communities

can actively manage the woodland for local community purposes, coppicing and natural materials for fuel fiber, crafts and small scale building projects

42. Introduce a pesticide ban in the county

43. Support Regenerative Bioregional Multi Stakeholder Landscape Partnership Projects

44. Galway City Council should have Nature Based Solutions (NBS) at the forefront of their adaptation and mitigation strategies for flooding and other climate driven risks. Successful projects such as the Salthill Sand Dune Project should be proliferated.

45. Support food security and sustainable local food production and ensure a safe and healthy environment that is resilient to the effects of climate change. The LACAP needs to address food security and food poverty. We want everyone in Galway City to have access to affordable, locally produced, nutrient dense, chemical-free food.

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from Third Space Galway, in relation to the items raised, responds as follows:

1. Comments noted, refer to Action 27.
2. Comments noted, refer to Action 1, 17.
3. Comments noted, refer to Action 27.
4. Comments noted, refer to Actions 1, 3, 15 and 27
5. Comments noted, refer to Action 9.
6. Comments noted, refer to Action 27.
7. Comments noted, refer to Action 27.
8. Comments noted, refer to Action 7.
9. Comments noted, refer to Action 3.
10. Comments noted, refer to Action 5.
11. Comments noted, refer to Action 27.

12. It is beyond the scope of the local authority to impose standards that are greater than those set out under legislation such as the building regulations (Part L of the Building Regulations transposes the European Energy Performance of Buildings Directive) or those required under Section 28 Ministerial Guidelines. The Climate Action Plan must adhere to national criteria for development. The Council policy as set out in the City Development Plan (Policy 2.4) is to encourage the design of high energy performance buildings through the siting, layout and design of new developments to make best use of renewable and low carbon energy opportunities and to encourage energy efficiency and conservation. It is also policy to support the retrofit and reuse of existing buildings in line with delivery of the proposed National Aggregated Model of Retrofitting. It also explicitly supports the implementation of the EU Energy Performance in Buildings Directive and the Building Energy Rating Certification (BER). In relation to local authority housing it encourages high standards of energy conservation and improved energy performance and including for a deep retrofit programme of works (currently under the Energy Efficiency Retrofit Programme).

13. Comments noted, refer to Action 48.

14. Comments noted, refer to Action 47, 49.

15. Galway Transport Strategy interventions: a fundamental shift is needed towards sustainable travel, reducing the dependency on the private car and taking action to make Galway more accessible and connected, enhancing quality of life within the City for all.

To address these problems, Galway City Council's (GCC) strategic objectives for transport are:

to promote and encourage sustainable transport

to manage the traffic in a way which maximises mobility and safe movement

to maintain and develop/upgrade Infrastructure

GCC are working with An Taisce on The Safe Routes to School (SRTS) programme. The Safe Routes to School (SRTS) programme is working with schools and local authorities across Ireland to support improvements to front of school environments as well as routes to school.

The School Street at Scoil Iognáid for example has been in operation since May 2022, starting initially as an informal school street with parents / guardians asked to voluntarily avoid driving to the school at school start and finish times and building up to a formal school street with statutory signage in place.

The School Street has been successful in reducing issues facing residents previously, such as school traffic blocking entrances to homes, and contributed to an increase in students walking, cycling, and scooting to school and is the first city school street.

16. GCC follows the National Standard 2023 Cycle Design Manual. The new manual draws on the experience of delivering cycling infrastructure across Ireland over the last decade, as well as learning from international best practice, and has been guided by the need to deliver safe cycle facilities for people of all ages and abilities.

17. The GTS sets out a proposal for a city wide quality cycle network. This network is intended to maximise coverage and increase dedicated cycle priority measures across the city linking with public transport hubs.

Galway City Council website has an online map displaying over 1,040 on-street public cycle parking spaces available in the City. The Galway City cycle parking map was developed to show where over 1,040 on-street cycle parking spaces are available in the city, and will assist Galway City Council to identify locations where additional cycle parking would be beneficial. The map will be updated as additional cycle parking is added, or where stands are relocated.

18. Refer to action 47, 48, 49.

20. As per the Galway Transport Strategy (GTS) a number of projects have been completed to increase permeability routes, examples of this being at the Eglinton Canal, Millers Lane and the South Doughiska cycle lanes. Other routes are currently being examined. In relation to walking, one of the Strategic Aims of the GTS is “to increase the quality, comfort and safety of the pedestrian facilities.” The projects in the GTS prioritise walking infrastructure as a core principle, while also seeking to make both cycling and public transport more attractive to the public. This is part of the overall aim which is to remove non-essential motorised traffic from the city centre area.

- 21.** The GTS recognises that the quality of the pedestrian environment is an important characteristic which influences residents, commuters, tourists and shoppers in their choice of destination and main mode of travel. This is detailed in the GTS appendix G Public Realm Proposals
<https://www.galwaycity.ie/galway-transport-strategy>
- 22.** As per the Galway Transport Strategy (GTS), works have commenced at Galway Train Station to enhance accessibility.
- 23.** GCC follows the National Standard, Design manual for Urban Roads and Streets in all upgrades and new projects. This is detailed in the GTS appendix D Public Transport Infrastructure Development
<https://www.galwaycity.ie/galway-transport-strategy>
- 24.** Galway City Council recognises the initial release of funding is not sufficient to complete the transition to a sustainable resilient city; however it is understood there will be further releases of funding in following years which Galway City Council will implement to support community organisations, Action
- 25.** Comments noted, refer to Action 25.
- 26.** Comments noted, refer to Actions 58 and 60.
- 27.** Comments noted, refer to Action 30.
- 28.** Submission references the “county”, Galway City Council currently promotes a re-use your coffee cup campaign and has established a deposit and return coffee cup scheme in the city in 2021, refer to Action 1.
- 29.** Comments noted, refer to Action 60.
- 30.** Comments noted, refer to Action 60.
- 31.** Comments noted, refer to Action 58.
- 32.** Submission references the “county”, refer to action 27 which refers to promotion of Climate Action in Galway City.
- 33.** Comments noted, refer to Action 33.
- 34.** Galway City Council are aware of the proposed EU restoration law; however, this is not drafted nor adapted by the European Bodies as of January 2024. Any subsequent adaptation will cascade through Government and possible local authority Actions, Action 4.
- 35.** Comments noted, refer to Action 34.
- 36.** Comments noted, refer to Action 27 and 15.

- 37.** Comments noted, refer to Action 40.
- 38.** Submission references the “county”, refer to action 34, 35, 37 and 38 for Galway City.
- 39.** Comments noted, refer to Action 37, 38, 34.
- 40.** Comments noted, refer to Action 34 and 35.
- 41.** Comments noted, refer to Action 34 and 35.
- 42.** Submission references the “county”, refer to Action 45 for Galway City.
- 43.** Comments noted, refer to Action 27 for promoting climate action throughout the City.
- 44.** Comments noted, refer to Action 15, 27, 32, 42
- 45.** Comments noted, refer to Action 27, 40

Recommendation

No change to the draft plan.

Submission 27

Submission By	Fair Seas
Issues Raised	Biodiversity, Marine Biodiversity, Marine Protected Areas
Submission Summary	
<p>The submission strongly suggests that an even greater emphasis on the role of biodiversity, and particularly the protection and restoration of <i>marine biodiversity is warranted</i> as the draft Climate Action Plan is progressed and associated Actions finalised.</p> <p>The protection and restoration of the environment, including the coastal and estuarine marine environment is vital for coastal and local city communities which are adapting to and growing resilience against the impacts of climate change. Therefore, Fair Seas recommends that Galway City Council;</p> <ol style="list-style-type: none"> 1. Support local communities in identifying coastal Marine Protected Areas (MPA) 2. Conduct feasibility studies for developing a Marine Protected Area 	

3. Carry out a marine ecosystem service assessment of the Galway City Council marine space
4. Form a MPA working group

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from Fair Seas, in relation to the items raised, Galway City Councils responses are follows:

The City has a significant and diverse range of habitats and species of national and European importance which are protected by legislation. The city supports the Galway Bay Complex and Lough Corrib Special Areas of Conservation (SACs), designated under the EU Habitats Directive and the Inner Galway Bay and Lough Corrib Special Protection Area (SPAs), designated under the EU 'Birds' Directive. These areas host the natural habitat types listed in Annex I and habitats of the protected species listed in Annex II. They are part of the Natura 2000 network of ecologically important sites across the EU and they seek to conserve a range of sensitive habitats and species. Within the city area there are also a network of local Biodiversity areas which are identified as having high conservation value. The council through the work of the Biodiversity Officer and the Recreation and Amenity of the council continue to support the protection of nature within the city through initiatives like the no mow scheme, native wildflower planting and pollination schemes.

With regard to the Marine Protected Areas (MPA), the role of the council/community in the designation of these areas is not clear. Progression of legislation in this regard is ongoing. According to the DHLGH, it is anticipated that the Marine Protected Areas Bill will be ready for publication in Q1 2024. It is noted that within the city, the coastal zoned is designated as both an SAC and SPA which gives significant protection.

Recommendation

No change to the draft plan.

Submission 28

Submission By	iRBEA
Issues Raised	General
Submission Summary	
<p>The submission outlines several items supporting the utilisation of bioenergy in progressing towards achievement of climate Action targets.</p> <ol style="list-style-type: none"> 1. As an organisation representing the various bioenergy disciplines, we firmly believe that bioenergy can continue to provide both decarbonisation opportunities across a wide range of sectors and society. 2. IrBEA would advocate for further development and mobilisation of biomass feedstocks and supply chains for the provision of bioenergy. 3. The role of bioenergy within our transport sector should be recognised. 4. Development of biogas/biomethane plants across the county and addressing the planning system will be key to mobilising the sector. 5. Wood Fuel Quality Assurance (WFQA) scheme on behalf of DAFM is undersubscribed and suggests that an enhanced ambition for its roll out. 6. Create awareness to further develop the biochar sector. 	
CE Response and Recommendation	
<p>Response</p> <p>Galway City Council acknowledges and welcomes this submission from the iRBEA, in relation to the items raised, Galway City Council responds as follows:</p> <ol style="list-style-type: none"> 1. Galway City Council is committed to developing an energy masterplan which will include renewable energy and energy storage for the city and implementing projects that will reduce carbon emissions towards both 2030 and 2050 targets, see Action 8 and 22. 2. Galway City Council is committed to developing an energy masterplan which will include renewable energy and energy storage for the city and 	

implementing projects that will reduce carbon emissions towards both 2030 and 2050 targets, see Action 8 and 22.

3. Galway City Council is committed to developing an energy masterplan which will include renewable energy and energy storage for the city and implementing projects that will reduce carbon emissions towards both 2030 and 2050 targets, see Action 8 and 22.
4. Galway City Council is committed to developing an energy masterplan which will include renewable energy and energy storage for the city and implementing projects that will reduce carbon emissions towards both 2030 and 2050 targets, see Action 8 and 22. Galway City Council is committed to implementing the Galway City Development Plan, Action 3, cross cutting policies and measures which support and facilitate a just transition to a low carbon and climate resilient society.
5. Galway City Council has committed to implementing projects that will reduce carbon emissions towards both 2030 and 2050 targets, see Action 4, 8, 22.
6. Galway City Council is committed to developing an energy masterplan which will include renewable energy and energy storage for the city and implementing projects that will reduce carbon emissions towards both 2030 and 2050 targets, see Action 8 and 22, 27.

Recommendation

No change to the draft plan.

Submission 29

Submission By	James McCarthy
Issues Raised	Cycling and Walking Infrastructure, Biodiversity Hotspots and Wildlife/ Nature Corridors
Submission Summary	
The submission outlines request to add the following Actions:	

1. Create Major, New and Truly Ambitious GREEN Cycling and Walking Infrastructure. The two Major Off-Road GREENWAYS are

- A. The #OranmoretoGalwayGREENWAY which will link Oranmore and beyond to the Galway City Center (at Railway Station)
- B. The @galwaygreenway which will link Moycullen and beyond to the University of Galway Campus
- 3. Creation of Several Major New Core "Permanent and Highly Protected" Green Areas (Biodiversity Hotspots and Wildlife/NATURE CORRIDORS)**

CE Response and Recommendation

Response

Galway City Council acknowledges and welcomes this submission from James McCarthy, in relation to the items raised, responds as follows

- 1.** The Oranmore to Galway City Greenway forms part of the Galway – Dublin Greenway. When the location of the entry point to the Galway City boundary is decided from the County Council project, Galway City Council intends to develop the phase of this greenway from the city boundary to city centre. Further, Galway City Council is committed to delivering the Galway to Oughterard Greenway, which is being led by Galway County Council, as one of the projects under Actions 47 and 49.
- 2.** Galway City Council intend to launch the Galway City Green Space Strategy in 2024, Action 34, and implement Actions within the current Biodiversity Action Plan and new revision of same for 2025-2030, Action 35.

Recommendation

No change to the draft plan.

Submission 30

Submission By	Peadar Ó hUallacháin
Issues Raised	Congestion, Need for Ring Road and additional river crossing
Submission Summary	
The submission outlines the urgent need for the traffic congestion in Galway City to be relieved through the provision of an additional bridge over the River Corrib and a city outer ring road.	
CE Response and Recommendation	
<p>Response</p> <p>Galway City Council acknowledges and welcomes this submission from, Peadar Ó hUallacháin, in relation to the item raised, Galway City Council responds as follows.</p> <p>Galway City Council is committed to the delivery of the Galway Transport Strategy (GTS), Action 47, and the development of the Galway Metropolitan Area Transport Strategy (GMATS), Action 48 and 55. At the time of publishing this plan, the application for the proposed Galway City Ring Road is with An Bord Pleanála for their consideration. The Bord will have consideration for the application for the proposed N6 Galway City Ring Road and will have regard to the Climate Action and Low Carbon Development (Amendment) Act 2021 and Climate Action Plan 2021. Galway City Council will support the decision of An Bord Pleanála in relation to proposed N6 Galway City Ring Road.</p> <p>Recommendation</p> <p>No change to the draft plan.</p>	

Additional Observations/ Recommendations Following Public Consultation Events

	Observation	Recommendation
1.	Some acronyms are not explained	Expand all acronyms and include in abbreviations table
2.	Grammatical errors observed	The plan will be updated for spelling, grammatical and phrasing errors

Summary of Chief Executive's Proposed Modifications

The following provides a list of minor modifications which have been proposed by the Chief Executive, on foot of public consultation of the Draft Climate Action Plan. The 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, Appendix A. The list contained in this section is for ease of reference and should be read in conjunction with the full Chief Executive's Report.

ID	Draft CAP Section and Page	Proposed Modifications
1	Section 1.1	Reference added to Met Éireann 2023 weather report. Met Éireann's annual climate statement for 2023 stated "warmest year on record by a large margin, above average rainfall"
2	Table 2-2	Clarification of Representative Concentration Pathway (RCP's) utilised in Table 2-2 added to Glossary. Representative Concentration Pathway Greenhouse gas concentration trajectory adopted by the Intergovernmental

		<p>Panel on Climate Change (IPCC), Table 2-2 consider the high end 4.5 and 8.5 scenarios to consider the worst-case scenarios in determining the project changes to climate hazards.</p> <p>RCP added to abbreviations: "RCP Representative Concentration Pathway"</p>
3	Action 6	<p>Amend Action 6: Facilitate Climate Action Regional Office (CARO) and Local Authority Training Group (LATG) Local Authority Services National Training Group (LASNTG) climate action training to elected members and local authority staff to build understanding, knowledge and capacity to deliver on climate action targets.</p>
4	Action 10	<p>Amend Action 10: Leverage actions from engagement in the EU Missions on Adaptation to Climate Change community of practice, which consists of leaders on climate adaptation in the European region to strive towards climate resiliency through a cooperative and just approach for the people of Galway City.</p>
5	Action 11	<p>Ammend Action 11: Review and update Galway City Council Major Emergency Plan to ensure incorporation of climate risks such as flash floods, storms, heatwaves, droughts and wildfires for Galway City-, leverage best practices and learnings from government and local authority responses in other countries where climate events have occurred to leverage knowledge in formulating Galway City's responses.</p>
6	Action 12	<p>Amend Action 12 to: Deploy weather impact register (WiRE) app to ensure GCC capture information of adverse climate events in a central location for future records, ease of location and reference. Consider rollout of the MapAlerter localised alert and notification service (SMS, App and Email).</p>

		Amend Action 12 KPI to: - Annual review of orange/ red weather warning events recorded on Wire App and develop a trend profile. - MapAlerter service rollout decision by 31.12.2024. Add Communications to action owner.
7	Action 16	Amend Action 16 to: Develop public website which displays progress on implementation of climate action plan and details example climate action projects. Consider a “citizen engagement” section of the public engagement website where such flood and climate change impacts can be recorded to establish such database. Amend Action 16 KPI to: Website in place by 30.06.2024 31.12.2024.
8	Action 21	Amended to add “measures relating to this plan.” at end of Action.
9	Action 23	Amend Action 23 Support the upgrade of stormwater pipe capacity in collaboration with Uisce Éireann, arising from the completion of the Greater Galway Strategic Drainage Study (GGSDS) and support implementation of the Galway Drainage Area Plan (DAP). Amend Action 23 KPI: - Annual reporting of DAP progress - Annual reporting of GGSDS progress - Completion of GGSDS by 31.12.2029.
10	Action 27	Number of engagements per annum across sectors (workshops, co-design, information events, wider engagement events, community one-stop shops) delivered in partnership with local groups annually. - Number of Local Green Deals implemented through the European Union Intelligent Cities Challenge annually.
11	Action 30	Amend Action 30:

		<p>Development and implementation of infrastructure and technology across the city to reduce water wastage, such as water fountains, and increase rainwater harvesting, in collaboration with Uisce Éireann where necessary.</p> <p>Develop feasibility studies for rainwater harvesting pilots across Galway City Council owned buildings, as possible solutions to implementing water conservation actions.</p> <p>Action 30 KPI amended to include:</p> <p>Completion of rainwater harvesting feasibility study completion by Q2 2025</p>
12	Action 33	<ul style="list-style-type: none"> - Climate Adaptation Plan actions implemented annually. - Galway City Flood Relief Scheme progress reported annually in line with stage 1 options development programmed to complete mid-2026 and followed by stage 2 statutory consent application subject to approval by OPW.
13	Action 36	<p>Develop and implement actions in the forthcoming Galway City Invasive Alien Species Strategy (GCIAS) 2024-2034 Strategy.</p>
14	Action 38	<p>Action 38 KPI amended:</p> <p>-Woodland management plans developed:</p> <p>-Barna Wood 31/12/2024, followed by Terryland Forest Park and Merlin Wood.</p> <p>Implement Barna Wood Management Plan (2022 revision)</p> <ul style="list-style-type: none"> - Terryland Forest Park and Merlin Wood management plans developed by Q4 2026.

15	Action 40	Amend Action 40 KPI to: Development of annual survey of allotment growers to establish database of local food production and fertiliser use.
16	Action 41	Amend Action 41 to: Support the development of a City Blueway Strategy for rivers and canals that considers maintenance, biodiversity, climate adaptation and emissions reduction and is informed by ecological assessment and provision of appropriate buffers and wildlife corridors in collaboration with Office of Public Works (OPW), Inland Fisheries Ireland (IFI), National Parks and Wildlife service (NPWS) , and Lough Corrib Navigational Trustees (LCNT).
17	Action 47	Amend action 47 KPI to: Number of projects completed annually to include count and brief summary of projects delivered, for example number of cycling and pedestrian interventions delivered, coupled with annual reporting on delivery progress of the Galway Transport Strategy and compare intercensal data in relation to walking or wheeling, cycling, and use of public transport.
18	Action 53	Update wording on Action 53, Encourage public and private transport providers to transition to a zero emission public transport and taxi fleet throughout Galway City as a priority city.
19	Section 4.4	Decarbonisation zone stakeholder table updated: University Hospital Galway replaced with Health Service Executive (HSE) . (Image update to HSE) The hospital HSE is a large energy user (GHG permit holder) within the zone, comprising a substantial proportion of emissions in buildings and enterprise sector. The hospital HSE is implementing decarbonisation and energy reduction plans. Galway Hydrogen Hub (G2) replaced with Galway Port and proposed Galway hydrogen hub.

		<p>(Image update to Port of Galway logo)</p> <p>This Plan acknowledges the potential to partner with the proposed hydrogen hub. Although the proposed location will be situated at the Port of Galway, outside of the DZ, its implementation will enable the sustainable use of hydrogen within the zone. This key enabling infrastructure will assist in the decarbonisation of the more challenging sectors such as industry and transport sectors, in particular.</p>
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6 Conclusions

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

The Elected Members have up to a maximum of 6 weeks to consider this Chief Executive's Report, in accordance with the requirements of the Climate (Amendment) Act 2021. Elected Members will be briefed on Monday 29th January 2024 to provide an overview of the Chief Executive's Report and on Monday 12th February 2024 Ordinary Council of Galway City 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 (Note: The Climate (Amendment) Act 2021 does not provide for a Material Amendments stage, by reason of the 12-month timescale and the relevant Plan making stages, as set out in the Ministerial Guidelines.)

Taking into account the Galway City 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 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.

7 Appendix A: SEA Screening Conclusion and Determination and AA Screening Conclusion and Determination

SEA Screening Conclusion and Determination

SEA Comment: The above modifications are minor in nature, providing additional commitment to monitoring and additional partners. These are not identified as giving rise to significant environmental effects. Taking into account the measures that have been already integrated into the Draft CAP that provide for and contribute towards environmental protection, environmental management and sustainable development, it is identified that any potential effects arising from the proposed modifications outlined in this Chief Executive's Report either are present already (beneficial) and will be further contributed towards; or will be mitigated so as not to be significant (adverse). In addition, some modifications merely propose to add clarification or amended context setting text for Plan provisions and these will not result in significant environmental effects. Consequently, the above Proposed amendments outlined in this Chief Executive's Report do not require SEA.

AA Screening Conclusion and Determination

All modifications proposed by the Chief Executive Report have been subject to screening for Appropriate Assessment. All modifications have been found not to have the potential to result in likely significant effects to European Sites. The inclusion of these modifications in the CAP will not have the potential to result in negative effects to the Conservation Objectives of European Sites occurring within the zone of influence of the CAP and an Appropriate Assessment of these modifications is not required.

In light of the findings of this report it is the considered view of the authors of this Screening Report for Appropriate Assessment that it can be concluded by Galway City Council that the proposed modifications to the draft CAP as set out in the Chief Executives Report, will not, alone or in-combination with other plans or projects, have a significant effect on any European Sites in view of their Conservation Objectives and on the basis of best scientific evidence and there is no reasonable scientific doubt as to that conclusion.