



**Chief Executive's Report  
on Submissions Received  
to Laois County Council  
Draft Climate Action Plan  
2023-2029**

**Contents**

**1 INTRODUCTION ..... 3**

**1.1 Purpose of the Report..... 3**

**1.2 Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) ..... 4**

**1.3 Background to the Climate Action Plan..... 4**

**2 The Public Consultation Processes..... 6**

**2.1 Outline of the Public Consultation Process ..... 6**

**2.2 Key Elements of the Public Consultation Process ..... 6**

**2.3 Public Information Events..... 9**

**3 DETAILS OF THE SUBMISSIONS ..... 11**

**3.1 Introduction..... 11**

**3.2 List of Persons, Organisations and Bodies who made Submissions ..... 11**

**3.3 Chief Executive’s Responses and Recommendations ..... 11**

**4 CATEGORISATION, SUMMARY AND RESPONSES TO ISSUES RAISED ..... 13**

**5 Summary of Chief Executive’s recommendations for Proposed Modifications..... 69**

**6 Conclusions ..... 71**

## 1 INTRODUCTION

### 1.1 Purpose of the Report

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

Further to Section 14 B of the Climate Action and Low Carbon Development Act 2015 (as amended), notice of the preparation of the Laois County Council Draft Climate Action Plan 2024-2029, was given on 26<sup>th</sup> October 2023 (and published in the local press on 31<sup>st</sup> October 2023). Submissions or observations with regard to the Draft Plan and Environmental Reports (Strategic Environmental Assessment and Appropriate Assessment Natura Impact Statement) were invited for a period of just over six weeks, from 1<sup>st</sup> November 2023 to 14<sup>th</sup> December 2023, inclusive.

In accordance with the requirements of the Climate Action and Low Carbon Development Act 2015 (as amended), this Chief Executive's Report summarises and details the outcome of the Public Consultation process on the Draft Climate Action Plan, as follows:

- lists the persons, organisations or bodies who made submissions or observations on the Draft Climate Action Plan;
- summarises the issues raised by the persons, organisations or bodies in the submissions or observations;
- gives the response and recommendation of the Chief Executive to the issues raised; and
- outlines any proposed modifications to the Draft Plan, on foot of the Public Consultation process.

This Chief Executive's Report on Submissions Received on the [Draft] Laois County Council Climate Action Plan along with the [Draft] Laois County Council Climate Action Plan are hereby submitted to the Elected Members of the Local Authority, for their consideration.

The Climate Action and Low Carbon Development Act 2015 (as amended) states:

*A local authority climate action plan shall be submitted to the members of the local authority concerned and those members shall, by resolution, within a period of six weeks—*

*(a) approve, or*

*(b) approve, subject to such modifications as they consider appropriate, the local authority climate action plan.*

*It is intended to list the [Draft] Laois County Council Climate Action Plan along with this Chief Executive's Report for consideration at the January 2024 meeting of the Council on 29<sup>th</sup> January.*

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

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

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

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

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

### **1.3 Background to the Climate Action Plan**

The Climate Action and Low Carbon Development Act 2015 (as amended) 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 structure of the local authority.

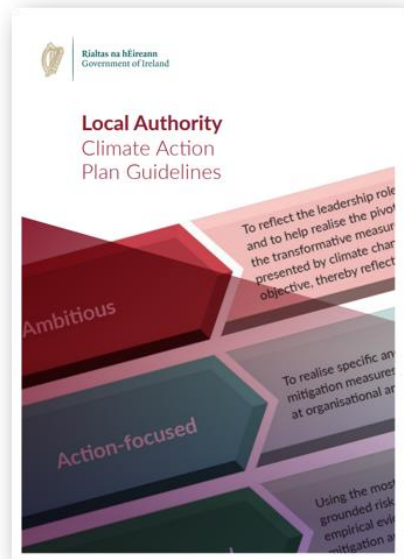
The Draft Climate Action Plan sets a clear pathway for Laois County Council to:

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

The Draft Plan has been prepared in accordance with the [Local Authority Climate Action Plan Guidelines](#), developed in response to The Climate Action and Low Carbon Development Act 2015 (as amended), 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 Laois County Council will be responsible for enhancing climate resilience, increasing energy efficiency and reducing greenhouse gas emissions, across its own assets, services and infrastructure, to which it is 'fully accountable' for, whilst also demonstrating a broader role of 'influencing', 'coordinating and facilitating' and 'advocating' for other sectors, to meet their own climate targets and ambitions.

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



## 2 THE PUBLIC CONSULTATION PROCESSES

### 2.1 Outline of the Public Consultation Process

The Draft Laois County Council Climate Action Plan was presented to the elected members of Laois County Council on 23<sup>rd</sup> October 2023 and the plan was approved to go on public consultation.

In accordance with the provisions of the Climate Action and Low Carbon Development Act 2015 (as amended), the Draft Climate Action Plan underwent statutory public consultation, from 1<sup>st</sup> November 2023 to 14<sup>th</sup> December 2023, inclusive.

The Climate Action and Low Carbon Development Act 2015 (as amended) states that in making the local authority climate action plan, a local authority shall:

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

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

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

### 2.2 Key Elements of the Public Consultation Process

Laois County Council conducted non statutory pre-draft consultations in the preparation of the draft document and then completed the statutory consultation process with the Draft Climate Action Plan. Key elements on the processes of both are outlined here:

- Online consultation portal
- Newspaper advertisement
- Public Information sessions
- Notice to adjoining Local Authorities for Draft Laois CAP
- Statutory bodies notification for Draft Laois CAP
- Public inspection and submissions on Draft Laois CAP

### Pre-Draft online consultation

To ensure that local views and concerns were considered and increase the understanding of the scope of the CAP, Laois County Council undertook a non-statutory consultation May 2023 with input from the public sought into the Pre-Draft Local Authority Climate Action Plan through an online consultation platform. This Pre-Draft consultation was conducted in tandem with that for the Laois LCDC Local Development Strategy and the Laois Local Economic and Community Plan. The purpose was to ensure all 3 plans are aligned and considering the sustainability components now deeply ingrained within both the LECP and LDS.

The responses gave a great insight into the climate action priorities of the people of Laois showing a high level of concern about climate change across the county.

Extensive use of the Council's social media networks was undertaken throughout the Pre-Draft CAP consultation process.

### Pre- Draft CAP: Engagement with Key Stakeholders and Young People

A stakeholder workshop was held on 19<sup>th</sup> May 2023; this stakeholder workshop was attended by representatives of a range of local organisations, including the Family Resource Centres, Local Enterprise Office, Laois Sports Partnership, Laois Integration Network, Youth Work Ireland Laois as well as officers from different departments within the Council.

Further one-to-one meetings were held with 19 stakeholders, with these listed below and covering a broad range of interests and specialists, including those working with and supporting disadvantaged and harder-to-reach groups.

#### Stakeholders:

- Laois Chamber Alliance
- Laois Comhairle na nOg
- Laois Sports Partnership
- Laois TASTE
- Portlaoise Family Resource Centre
- SICAP, Social Inclusion Manager
- Laois Tourism
- Laois Traveller Action Group
- Irish Farmers Association
- Midlands LGBT Project
- Laois PPN, Resource Worker
- Laois PPN, Secretariat (Community & Voluntary Pillar)
- Director of Service for Ukrainian Response Forum
- Laois PPN, Secretariat (Social Inclusion Pillar)
- Laois PPN, Secretariat (Environmental Pillar)
- Midlands Regional Drug & Alcohol Task Force, Co-Ordinator

- Laois Local Enterprise Officer
- Tusla/CYPSC
- LOETB, Youth Officer
- LOETB, Local Creative & Youth Co-Ordinator
- Laois Partnership Company – A/Rural Development Programme Manager
- Resettled Syrian Refugee
- Laois Integration Networks
- Laois Volunteer Centre, Manager

#### Draft Laois CAP newspaper advertisement

A notice was published in the local press on 31<sup>st</sup> October 2023 indicating how and when to access the Draft Laois Climate Action Plan with details of how to make an observation. Extensive use of the Council's social media networks was undertaken throughout the Draft CAP consultation process.

#### Notice to adjoining LAs and statutory consultees of Draft Laois CAP

The Climate Action and Low Carbon Act 2015 (as amended) requires that local authorities "consider any significant effects the implementation of the Local Authority Climate Action Plan may have on adjoining local authorities" and to "consider any submissions made to it by an adjoining local authority".

Notice of the preparation of the Laois Draft Climate Action Plan was sent on October 31<sup>st</sup> to adjoining Local Authorities with details of how and when to access the Draft and how to make an observation. Notice was also sent to other statutory consultees.

#### Draft Laois CAP public consultation

The Draft Laois Climate Action Plan was made available to be inspected during public opening hours from Wednesday, 1st November 2023 until Thursday, 14th December 2023 inclusive, at the following locations:

- Áras an Chontae, JFL Avenue, Portlaoise R32 EHP9
- Mountmellick Library, O'Moore St, Townparks, Mountmellick, Co. Laois R32 PX61
- Portarlinton Library, 2 Main St, Cooltederry, Portarlinton, Co. Laois, R32 F9WF
- Abbeyleix Library, Market House, Market Square, Abbeyleix, Co. Laois R32 CY65
- Portlaoise Library, 23 Lower Main Street, Portlaoise, Co. Laois R32 N7EP

A copy of the Draft Climate Action Plan, together with associated documents, was available to view and make submissions on at <https://consult.laois.ie/>



## 2.3 Public Information Events

### Pre-Draft consultation events

Laois County Council ran a series of 6 in-person community workshops across Laois between 16th – 25<sup>th</sup> May 2023. In addition, there was a virtual workshop via Zoom on 20th May 2023. The timing and location of these workshops were structured to allow as many people as possible to attend. Online advertisements were placed on Laois Today and Leinster Express and Midlands 103 both online and radio adverts. In addition, 64 letters were sent via email to stakeholders and followed up phone calls to ensure good turnout.

In total these workshops were attended by 113 citizens who participated in a range of exercises that were designed to capture insights and ideas which directly fed into the Draft Laois CAP. The numbers at each workshop were:

- Rathdowney: 18
- Mountmellick: 23
- Abbeyleix: 14
- Online: 8
- Portarlinton: 14
- Portlaoise: 23
- Ballylinan: 13

### Draft Laois CAP public events

During the Draft Climate Action Plan consultation period of the 1<sup>st</sup> November – 14<sup>th</sup> December, a number of public information events took place as follows:

Location	Drop-in clinic	Times
Mountmellick Library	Weds 15th Nov	11am - 1pm
Portarlinton Library	Weds 15th Nov	5pm -7pm
Abbeyleix Library	Thurs 23rd Nov	11am-1pm
Portlaoise Library	Thurs 23rd Nov	5pm - 7pm

Council Climate staff were available during the times at the venues below to provide guidance on the Draft Climate Action Plan and on the consultation process. These were drop in clinics with no need to make an appointment.



Laois County Council  
Áras an Chontae, Portlaoise, Co. Laois

# CLIMATE ACTION PUBLIC INFORMATION DROP-IN EVENTS

## DRAFT LAOIS LOCAL AUTHORITY CLIMATE ACTION PLAN 2024-2029 AND COMMUNITY CLIMATE ACTION FUND "OPENING SOON"

Mountmellick Library  
Portarlington Library

Wednesday 15th Nov. 11am-1pm  
Wednesday 15th Nov. 5pm-7pm

Abbeyleix Library  
Portlaoise Library

Thursday 23rd Nov. 11am-1pm  
Thursday 23rd Nov. 5pm-7pm



At these times climate action council staff will be available to  
- provide guidance on the Draft Climate Action Plan and the consultation process  
- advise on how to apply to the Community Climate Action Fund

More information is available on Laois Community Climate Action Fund at <https://laois.ie/ClimateAction> page

The Draft Laois Climate Action Plan and associated documents are available to view online at <https://consult.laois.ie/>



### **3 DETAILS OF THE SUBMISSIONS**

#### **3.1 Introduction**

A total of 18 valid submissions and observations were received as a result of the formal consultation process ending December 14<sup>th</sup> 2023.

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

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

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

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

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

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

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

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

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

The Draft Climate Action Plan has been based on ambitious but achievable targets within the physical, financial, and human resources available to the Council. It has been important in drawing up the Action Plan to concentrate on actions achievable within resources and on those actions considered to have better or more realisable impacts. Of necessity this involved not including some potential actions in the draft plan in favour of those considered to have greater realisable merit within the timeframe. Therefore, as a general principle in evaluating submissions that might seek to include additional actions within the plan, a similar evaluation

process is necessary; such evaluation process could include substituting new actions for existing actions in order to maintain the overall achievability of the plan.

Included within the submissions to the Draft CAP are many items which, within their own context, have merit. Where a particular submission does not result in a proposed change to the Draft CAP, such should not be interpreted as any slight on the matters being raised. In general matters of additional detail or matters relevant to the practicalities of implementation were not added into the CAP as a result of the submissions.

#### 4 CATEGORISATION, SUMMARY AND RESPONSES TO ISSUES RAISED

All 18 valid submissions and observations were read, analysed and summarised.

##### 4.1 Submission LS-C73-1

Submission LS-C73-1	Submission Summary	CE Response and Recommendation
Tim Coleman Cycle Lane at entrance to St Brigid's Square.	<ol style="list-style-type: none"><li>1. The availability of the parking in St Brigid's Square</li><li>2. Reasons for location chosen</li><li>3. Length of cycle lane</li><li>4. Query regarding use of cycle lane</li></ol> <p>Concerns in relation to the construction of a specific cycle lane. This submission relates to a physical project and not to the Climate Action Plan itself.</p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged. This submission relates to a physical project and not to the Climate Action Plan itself.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>

4.2 Submission LS-C73-2

Submission LS-C73-2	Submission Summary	CE Response and Recommendation
Environmental Protection Agency	<p>The submission contains a statement to the effect that the plan aligns with national policy:</p> <p><i>“We 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”</i></p>	<p><b>CE Response:</b>                      The submission is welcomed and contents are acknowledged.                      The EPA acknowledgement of alignment is welcomed</p> <p><b>CE Recommendation</b>                      No Change to the Draft Plan</p>
Environmental Protection Agency	<p>The submission requests as follow</p> <p><i>“You should also consider taking into account the EPA’s ‘Climate Change in the Irish Mind’ project in finalising the Plan. This research is part of the National Dialogue on Climate Action.”</i></p>	<p><b>CE Response:</b>                      The submission is welcomed and contents are acknowledged.                      A broad range of national documentation, including that produced by the EPA were taken into account when preparing the CAP. The EPA’s ‘Climate Change in the Irish Mind’ will also be useful during the implementation stages.</p> <p><b>CE Recommendation</b>                      No Change to the Draft Plan</p>
Environmental Protection Agency	<p>The submission requests as follows:</p> <p><i>“We 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”</i></p>	<p><b>CE Response:</b>                      The submission is welcomed and contents are acknowledged.                      The CAP already contains the following commitment: to <i>“ensure that delivery is timely, the implementation of the [Draft] Climate Action Plan will be monitored via an in-house tracking system. The local authority will also facilitate reporting to elected members through the</i></p>

		<p><i>management reports to Council meetings and quarterly updates to the Climate Action and Community Strategic Policy Committee (SPC)”</i></p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
<p>Environmental Protection Agency</p>	<p>The submission recommends:</p> <p><i>“We recommend that the findings of the SEA ER and NIS are fully reflected in the Plan, to ensure that the relevant recommendations are fully considered and integrated as appropriate.”</i></p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged. The EPA submission in relation to the SEA / AA /NIS processes is noted; the Council has engaged with these processes in the preparation of the plan.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
<p>Environmental Protection Agency</p>	<p><i>” The Plan should include a commitment to remain aligned with high level plans and programmes, Guidelines, and legislation over its lifetime.”</i></p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged. However the current CAP can only align with existing high level plans; future revisions of the CAP can take into account the legislation and guidelines applicable at that time. However in the year-by-year implementation of the actions under the plan the local authority (as is both the defacto and dejure position) continue to take account of updated legislation and guidelines.</p> <p><b>CE Recommendation</b> It is recommended to insert the following text at the end of Section 3.4: “In the implementation of</p>

		<p>this plan due regard will be had to developments in national high level documents (such as updates to the National Climate Action Plan) and similar local documents (such as the County Development Plan). Implementation plans will include for required mitigation measures and take due regard of other environmental constraints and benefits.”</p>
<p>Environmental Protection Agency</p>	<p><i>“We note the alternatives considered in the SEA and acknowledge the preferred option selected.”</i></p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
<p>Environmental Protection Agency</p>	<p><i>Once the Plan is adopted, you should prepare an SEA Statement that summarises:</i></p> <ul style="list-style-type: none"> <li>• <i>How environmental considerations have been integrated into the Plan;</i></li> <li>• <i>How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;</i></li> <li>• <i>The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,</i></li> <li>• <i>The measures decided upon to monitor the significant environmental effects of implementation of the Plan.</i></li> </ul> <p><i>You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.</i></p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged. The EPA advice is welcomed</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>



### 4.3 Submission LS-C73-3

Submission LS-C73-3	Submission Summary	CE Response and Recommendation
Nephin Renewable Gas on Action 63	Submission requested that the following text be added to Action 63: <i>“Which will reflect a mix of electric and renewable fuel sourced vehicles, including those operating on biomethane”</i>	<p><b>CE Response:</b></p> <p>The submission is welcomed and contents are acknowledged.</p> <p>The existing action is to provide a roadmap towards sustainable decarbonisation. The submission seeks to limit or prescribe the outcome of that study. As such it is recommended that the submission not be accepted</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
Nephin Renewable Gas on GAP Regulations	Submission requested that the following text be added to Action 76 <i>“Such practices should also examine the use of anaerobic digestion as essential to all GAP measures.”</i>	<p><b>CE Response:</b></p> <p>The submission is welcomed and contents are acknowledged.</p> <p>The GAP regulations are national in nature and LCC is not empowered to alter them locally in the way suggested. As such it is recommended that the submission not be accepted</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
Nephin Renewable Gas on procurement of biomethane	Submission requested: (that the Council) <i>“Adopt a policy to purchase a proportion of biomethane to offset the Council’s gas consumption. By committing to buying a proportion of</i>	<p><b>CE Response:</b></p> <p>The submission is welcomed and contents are acknowledged.</p>

	<p>renewable gas, the Council will be directly stimulating the market for biomethane”</p>	<p>The Council procures its electricity and gas supplies through a nationally organised tender process. As such the council is constrained by the options offered by the Office of Government Procurement.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
<p>Nepin Renewable Gas on CNG powered vehicles</p>	<p>Submission raised the issue of: (that the Council) <i>“Conduct a feasibility into the benefit of procuring bio CNG powered vehicles.”</i></p>	<p><b>CE Response:</b></p> <p>The submission is welcomed and contents are acknowledged. Existing Action 63 looks to provide a roadmap towards sustainable decarbonisation of its fleet. The submission looks at one potential option to reduce carbon within that fleet; it that regard it could be considered as seeking to limit or prescribe the outcome of that study. As such it is recommended that the submission not be accepted</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
<p>Nepin Renewable Gas on Grass cuttings</p>	<p>Submission raised the issue of: <i>Conduct a feasibility into the benefits of treating grass cuttings through (anaerobic digestion) AD.</i></p>	<p><b>CE Response:</b></p> <p>The submission is welcomed and contents are acknowledged. Laois County Council is aware that another local authority is considering a feasibility study on AD for grass cuttings and that local authority will share the results of its study.</p>

		<p>There is already planning permission for an AD plant near Portlaoise which would utilise collected waster material (including domestic garden waste as part of a brown bin system). Should that AD plant be constructed, it would change the background for the feasibility study requested.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
<p>Nephin Renewable Gas on gas network connection points</p>	<p>Submission raised the issue of: <i>Work with GNI (Gas Networks Ireland) to facilitate installation of connections to the gas distribution and transmission systems and CNG refuelling infrastructure.</i></p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged. The provision of such connections is primarily a matter for GNI; the Council may have a role as a planning authority. The County Development Plan already states under CM RE 2: “Promote and encourage the development of energy from renewable sources such as hydro, bioenergy, wind, solar, geothermal and landfill gas subject to compliance with normal planning and environmental criteria in co-operation with statutory and other energy providers”. Therefore the matter is considered sufficiently covered within the existing range of plans by the Council.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
<p>Nephin Renewable Gas on a biomethane awareness day</p>	<p>Submission raised the issue of .....</p>	<p><b>CE Response:</b></p>

	<p><i>Support a public biomethane awareness day to raise the public profile of the benefits of AD</i></p>	<p>The submission is welcomed and contents are acknowledged.</p> <p>While acknowledging that biogas and biomethane will have a role to play nationally in reducing carbon emissions, the issues raised (of supporting an awareness day) is not considered to be an action of sufficient merit as to be included within the Climate Action Plan.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
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4.4 Submission LS-C73-4

Submission LS-C73-4	Submission Summary	CE Response and Recommendation
Community Gardens Ireland on allotments	<p>The request here is that the CAP</p> <ul style="list-style-type: none"> <li>a. Recognise that growing food in allotments can reduce biodiversity loss, and</li> <li>b. support growing food in allotments and community gardens</li> </ul>	<p><b>CE Response:</b></p> <p>The submission is welcomed and contents are acknowledged.</p> <p>The County Development Plan at NRPO 8 already states: <i>“Encourage community gardening, allotments and other use of open space to facilitate lower carbon living education and practice.”</i></p> <p>Therefore the matter is considered sufficiently covered within the existing ranges of plans by the Council.</p> <p><b>CE Recommendation</b></p> <p>No Change to the Draft Plan Insert a new Action : <i>“Support community based food growing initiatives through the development of community gardening advice guidelines.”</i></p>
Community Gardens Ireland on community gardens under the National Climate Action Plan	<p>Submission raised the issue of :</p> <p><i>“that the National Climate Action Plan include a recommendation for all local authorities to include in their plans an increase in allotments &amp; community gardens for each local authority area”</i></p>	<p><b>CE Response:</b></p> <p>The submission is welcomed and contents are acknowledged.</p> <p>This submission is focused on a National level action rather than directly on the LCC CAP.</p> <p><b>CE Recommendation</b></p> <p>No Change to the Draft Plan</p>

<p>Community Gardens Ireland on urban agriculture under the National Climate Action Plan</p>	<p>Submission raised the issue of “Community Gardens Ireland believes that an urban agriculture or community growing action should be included as part of Section 10 (Public Sector Leading by Example) of the National Climate Action Plan”</p>	<p><b>CE Response:</b>                  The submission is welcomed and contents are acknowledged.                  This is a submission focused on a National level action rather than directly on the LCC CAP  <b>CE Recommendation</b>                  No Change to the Draft Plan</p>
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## 4.5 Submission LS-C73-5

Submission LS-C73-5	Submission Summary	CE Response and Recommendation
Inland Fisheries Ireland	Submission raised the issue of Re: <i>A5 To consider climate impacts in the development of policies and programmes-</i> that the scope and definition of climate impacts should include impacts on water quality, aquatic habitats and aquatic life	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged. The definition of “climate impacts” is not constrained in this section. It will be a matter for the relevant policies and programmes to consider the items (appropriate to those policies and programmes) that impact on climate.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
Inland Fisheries Ireland	Submission raised the issue of: Re <i>C1 To maintain and develop cooperations with other bodies at a local/ regional/ national level</i> - IFI requests that the local authority consults with IFI before undertaking any programmes or measures involving instream or riparian works.	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged. The undertaking here under C1 is to maintain cooperation with other bodies. Certain work programmes are already subject to statutory processes and LCC already interacts with IFI on a number of matters.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
Inland Fisheries Ireland	Submission raised the issue of: Re <i>E1 To continue to implement approved flood protection and drainage measures.</i> “ IFI recognises the necessity of flood management, however there is a need to move to an integrated, catchment-based approach which includes the	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged. The LCC commitment here is to implement approved flood protection and drainage measures.</p>

	<p>restoration of fisheries habitat for native species such as salmon. “</p>	<p>The significant programmes under these measures (eg Mountmellick Flood relief) are subject to their own statutory processes; the matters raised by IFI are more suited to those statutory processes rather than this CAP.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
<p>Inland Fisheries Ireland</p>	<p>Submission raised the issue of: <i>Re E2 To consider climate factors in our choices of construction materials and construction options.</i></p> <p>“Construction options include where and how to carry out flood remediation works and the choice of materials for such works. IFI requests that natural solutions are considered for instream and riparian works and given primacy over hard engineering solutions”</p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged. This element of the submission relates to one potential element of future works- flood remediation, riparian and in-stream works. Within the broad nature of E2 it is not considered appropriate to list in detail how that goal might be implemented across each aspect of the full range of Council activities.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
<p>Inland Fisheries Ireland</p>	<p>Submission raised the issue of: <i>Re E3 To consider, where appropriate, nature based and nature friendly solutions to infrastructural elements.</i></p> <p>“IFI supports the use of nature based solutions.” There are other comments within this subsection of the IFI submission which are tangential to the matter raised – such as certain guidance documents.</p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged. The support for nature based solutions is welcomed. The reference to guidance documents is useful Once again, within the broad nature of E3 it is not considered appropriate to list in detail how that</p>



		<p>goal might be implemented across each aspect of the full range of Council activities.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
<p>Inland Fisheries Ireland</p>	<p>Submission raised the issue of: <i>Re E4 To maintain and improve water quality and biodiversity in our waterways, which will help mitigate the impacts of climate change on those waterways</i> IFI made two main points here: “Building climate resilience of our watercourses involves multiple co-benefits” “Restoring longitudinal connectivity in watercourses through barrier removal should be an explicit goal in the climate action plan”</p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged. The recognition of the benefits of climate resilience of our watercourses is welcomed.</p> <p>In relation to the removal of barriers in watercourses, the IFI website states “Barriers can be natural or man-made and include weirs, bridges, waterfalls, culverts, debris blockages and hydroelectricity generating stations”. It is unlikely that LCC will be involved directly as the commissioning authority with removing generating stations or weirs (nor indeed is it likely to be removing bridges). While recognising the IFI aims to improve on the passage of fish, the CAP is not considered the appropriate vehicle for the repetition of that aim.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
<p>Inland Fisheries Ireland</p>	<p>Submission raised the issue of: <i>Re E5 To continue to implement approved flood protection and drainage measures</i> IFI recommends an integrated, catchment-based approach to flood mitigation and flood management.</p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged. New flood protection measures -such as the Mountmellick scheme- will have to undergo</p>

	<p>Practices undertaken in the past, e.g. by the Barrow Drainage Board increased the land available for agriculture; Flood Risk Assessment plans should also consider the protection of vulnerable areas for recreational and amenity use rather than development, for example as recommended by IFI’s Planning for Watercourses in the Urban Environment (2020).</p>	<p>approvals through the normal planning and environmental assessment processes. In terms of its statutory role in relation to maintenance on the Barrow Drainage, Laois County Council has no plans under this CAP to reverse works undertaken by the previous drainage board.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
Inland Fisheries Ireland	<p>Submission raised the issue of: <i>Re Action 16 Laois County Council to work collaboratively with other public bodies</i> “IFI welcomes this and refers to its comment on Strategic Goal and Objective C1 above”.</p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged. The welcome by IFI for this action is noted. The comments under C1 have previously been dealt with.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
Inland Fisheries Ireland	<p>Submission raised the issue of <i>Re Action 24 “Climate and Green Infrastructure” checklist for designers of roads and public realm infrastructure.</i> “IFI welcomes the inclusion of environmental and climate impact checklists for proposed works on this nature”. IFI request that the IFI’s document on Planning for Watercourses in the Urban Environment should be considered during the preparation of the ckecklist.</p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged . It is noted that IFI welcome the production of the checklist.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
Inland Fisheries Ireland	<p>Submission raised the issue of <i>Re Action 25 “Guide for good practice in Climate Conscious Design” for developments</i></p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged .</p>

	<p>Comment from IFI on what might be included in that guide when it is produced</p>	<p>The comment from IFI is on what might be included in the Guide rather than the action within the CAP of producing the Guide.  <b>CE Recommendation</b>                  No Change to the Draft Plan</p>
<p>Inland Fisheries Ireland</p>	<p>Submission raised the issue of:  <i>Re Action 26 Climate and Green Infrastructure” checklist for designers of new Council Housing stock</i>                  Comment from IFI on what might be included in that checklist when it is produced</p>	<p><b>CE Response:</b>                  The submission is welcomed and contents are acknowledged .                  The comment from IFI is on what might be included in the checklist rather than the action within the CAP of producing the checklist.   <b>CE Recommendation</b>                  No Change to the Draft Plan</p>
<p>Inland Fisheries Ireland</p>	<p>Submission raised the issue of:  <i>Re Action 35 Increase of 1% per annum above inflation for gully maintenance and general piped drainage maintenance.</i>                  IFI have provided general advice on maintenance</p>	<p><b>CE Response:</b>                  The submission is welcomed and contents are acknowledged .                  The comment from IFI is on maintenance in general, rather than on the proposed action.  <b>CE Recommendation</b>                  No Change to the Draft Plan</p>
<p>Inland Fisheries Ireland</p>	<p>Submission raised the issue of .....  <i>Re Action 36 Increase of 1% per annum above inflation over the life of this plan for masonry bridge works</i>                  IFI have provided general advice on construction works adjacent to waters</p>	<p><b>CE Response:</b>                  The submission is welcomed and contents are acknowledged .                  The comment from IFI is on good practice during construction in general rather than on the proposed action.   <b>CE Recommendation</b>                  No Change to the Draft Plan</p>

Inland Fisheries Ireland	<p>Re <i>Action 37 Increase of 1% per annum above inflation over the life of this plan for river drainage works.</i>  “IFI has concerns as to the proposed works intended under this action.”</p>	<p><b>CE Response:</b>  The submission is welcomed and contents are acknowledged .  The normal river drainage works by Laois County Council consists substantially of maintenance of existing channels. Typically works beyond the most straightforward require AA and referral to An Bord Pleanála.</p> <p><b>CE Recommendation</b>  For purposes of clarity, it is proposed to amend Action 37 by replacing “river drainage works” with “river drainage maintenance works” in the text of the action</p>
Inland Fisheries Ireland	<p>Re: <i>Action 38 Support for OPW flood protection schemes in the towns of Mountmellick, Portarlinton and Clonaslee</i>  IFI is liaising with consultants and local authority staff in relation to these schemes.</p>	<p><b>CE Response:</b>  The submission is welcomed and contents are acknowledged .  The interaction by IFI on the development of these schemes is noted.</p> <p><b>CE Recommendation</b>  No Change to the Draft Plan</p>
Inland Fisheries Ireland	<p>Re <i>Action 39 Prepare a three-year forward plan for river maintenance of river channels</i>  “. All works in a river channel or along its riparian zone must incorporate best practice guidelines”</p>	<p><b>CE Response:</b>  The submission is welcomed and contents are acknowledged .  The request to follow practice and timing guidelines is noted. The comment from IFI is on good practice during construction in general rather than on the proposed action.</p>

		<p><b>CE Recommendation</b> No Change to the Draft Plan</p>
Inland Fisheries Ireland	<p><i>Re Action 66 Map and record all major road drainage spine networks to establish accurate data on the existing drainage infrastructure</i> “IFI welcomes this commitment.”; The IFI also comment on potential future work including mitigating pollutants in run off</p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged . It is noted that IFI welcome this action.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
Inland Fisheries Ireland	<p><i>Re Action 69 Tree Strategy having due regard for water quality and soil stability issues</i> “An ecologically sensitive tree strategy can improve climate resilience, water quality and biodiversity”</p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged . It is noted that IFI appear to welcome this action.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
Inland Fisheries Ireland	<p><i>Re Action 75 Reduction in use of chemical pesticides and herbicides lands and areas managed by the Council.</i> IFI advocates the complete elimination of the use of chemical pesticides and herbicides on bridges and in riparian zones</p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged . The position of IFI is noted. The proposed action is across the whole of the LCC work-areas.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
Inland Fisheries Ireland	<p><i>Re Action 76 Enforce GAP (Good Agricultural Practice) regulations</i></p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged . It is noted that IFI appear to welcome this action.</p>

	<p>“Effective enforcement of the GAP Regulations by all relevant agencies is essential for water quality and achieving compliance with the WFD objectives.”</p>	<p><b>CE Recommendation</b> No Change to the Draft Plan</p>
<p>Inland Fisheries Ireland</p>	<p><i>Re Action 77 Work with partner bodies to continue to raise awareness on Good Agricultural Practices</i> “IFI welcomes this action”</p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged . It is noted that IFI appear to welcome this action. .</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
<p>Inland Fisheries Ireland</p>	<p>IFI requests consideration of a review of abstraction licences and discharge licences in the light of potential droughts.</p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged . The Council in the preparation of the Draft CAP had considered an action along similar lines in relation to climate change. However on reflection, such an action was not included in the draft CAP as it was considered that such licences are subject to their own statutory processes.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>

**4.6 Submission LS-C73-6**

Submission LS-C73-6	Submission Summary	CE Response and Recommendation
<p>Dept. of Agriculture Food &amp; the Marine</p>	<p>Submission raised the issue of: Local authorities should include relevant steps to support a Just Transition for the sea fisheries and aquaculture sectors in their Climate Action Plans.</p>	<p><b>CE Response:</b> The submission is welcomed and the contents are acknowledged</p> <p>Laois is a non-coastal county. Laois County Council will continue to work with partners and other organisations to protect waters within the administrative area of Laois County Council.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>

**4.7 Submission LS-C73-7**

Submission LS-C73-7	Submission Summary	CE Response and Recommendation
Submission from Not Here Not Anywhere	<p>Submission raised the issue of:                      Inserting additional actions into the plan as follows:                      “The Climate Action Plan should ensure a rapid phasing out of all fossil fuels including gas.                      The Climate Action Plan should include a planned phasing out of existing connections to the gas grid.                      The Climate Action Plan should ban fracked gas in its energy mix.                      The Climate Action Plan should rule out any new fossil fuel infrastructure projects.                      The County Council should pass a motion calling on the Irish Government to join the bloc of nation-states seeking to negotiate the Fossil Fuel Non-Proliferation Treaty - a new international treaty to complement the Paris Agreement and address the root cause of the climate crisis: fossil fuel.”</p>	<p><b>CE Response:</b>                      The submission is welcomed and the contents are acknowledged.                      However it is considered that the proposed actions do not fall within the remit of the CAP.                      The request for the Council to pass a particular motion is a matter for the general Council agenda rather than a Climate Action Plan.                      The Climate Action Plan is not a County Development Plan and does not set development standards, zoning or planning guidelines for any particular type of development.                      In turns of national planning for Climate matters, the Laois CAP sits beneath the National Climate Action Plan; Laois County Council is currently on track to meet the emissions targets for 2030 for its own emissions in line with the national targets.</p> <p><b>CE Recommendation</b>                      No Change to the Draft Plan</p>



#### 4.8 Submission LS-C73-8

Submission LS-C73-8	Submission Summary	CE Response and Recommendation
Global Action Plan	<p>Submission raised the issues of:</p> <p>GAP state that they seek to highlight a couple of areas that may help strengthen the Council’s commitments:</p> <ul style="list-style-type: none"> <li>• The importance of climate action at all levels of society;                             <ul style="list-style-type: none"> <li>○ In that context, GAP stated that they appreciate the emphasis placed in the draft strategy on citizen engagement and training.</li> </ul> </li> <li>• The reasons why community climate action has been lagging to date;                             <ul style="list-style-type: none"> <li>○ GAP consider it is important to place greater stress on what should be the aim of any such engagement activities: the encouragement and development of local, informed climate actions.</li> </ul> </li> <li>• The importance of linking climate action and social inclusion;                             <ul style="list-style-type: none"> <li>○ The references to Just Transition in the draft Action Plan are very important and extremely valuable.</li> <li>○ GAP recommend further reflection on how the Council’s Climate Action Plan can contribute to ‘Just Resilience’ and Social Inclusion.</li> <li>○ the Draft Action Plan is a document that is difficult to access for people with a disability or literacy challenges.</li> </ul> </li> </ul>	<p><b>CE Response:</b></p> <p>The submission is welcomed and the contents are acknowledged.</p> <p>It is noted that the emphasis on citizen engagement and training is appreciated in the submission.</p> <p>The suggestion to include the aim of engagement activities is noted.</p> <p>The submission on the references to just transition in the plan are noted.</p> <p>The submission about reflecting on just resilience and social inclusion are noted as points that could form part of the implementation subsequent to the adoption of the plan.</p> <p>The submission on the document being difficult to access is noted. It was necessary to stick within national templates in the production of the document. However, LCC will consider the production of an “easier to read” version of the commitments under the adopted Plan.</p> <p>In relation to the comments on allotments and community gardens:</p> <p>The matters raised in relation garden are considered sufficiently covered within the existing ranges of plans by the Council, in particular under</p>

	<ul style="list-style-type: none"> <li>• The potential of community gardening.             <ul style="list-style-type: none"> <li>○ While GAP welcome the emphasis on the ‘Town In A Garden’ project, GAP note with concern that the document contains no references to community gardens.</li> <li>○ GAP would welcome a more explicit emphasis on the role Laois County Council sees for itself in supporting allotments and community gardens throughout the County.</li> </ul> </li> <li>• In addition, GAP extended an invitation to Laois County Council to partner with the GAP organisation</li> </ul>	<p>the County Development Plan at CALU6, NRPO9 and NRPO8.</p> <p>CA LU 6 Increase the climate resilience of the built environment through natural greening infrastructure in new developments, such as the use of natural features (e.g. street trees, green roofs, rain gardens etc) and other materials such as permeable paving</p> <p>NRPO 9 Encourage and facilitate the development of green infrastructure that recognises the synergies that can be achieved with regard to the following: • Provision of open space amenities; • Sustainable management of water; • Protection and management of biodiversity; • Protection of cultural heritage; • Protection of protected landscape sensitivities.</p> <p>NRPO 8 states: “Encourage community gardening, allotments and other use of open space to facilitate lower carbon living education and practice.”</p> <p>Therefore, the matter is considered sufficiently covered within the existing ranges of plans by the Council.</p> <p><b>CE Recommendation</b></p> <p>In Action 15 it is recommended to insert the words “ and to encourage local informed climate actions” after the word “achievements”</p> <p>In Action 83 it is recommended to insert the words “ to encourage local informed climate actions” after the words “guidance documentation”</p>
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#### 4.9 Submission LS-C73-9

Submission LS-C73-9	Submission Summary	CE Response and Recommendation
<p>Department of Housing, Local Government and Heritage</p>	<p>Submission raised the issue of:</p> <ul style="list-style-type: none"> <li>• Identifying the built and archaeological heritage assets in the local authority area including, but not restricted to, structures and sites subject to statutory protection.                             <ul style="list-style-type: none"> <li>○ assess the vulnerability of the above assets to climate change,</li> <li>○ increase the resilience of the above assets</li> <li>○ develop disaster risk reduction policies for direct and indirect risks</li> </ul> </li> <li>• Including objectives to carry out climate change risk assessments, including condition assessments, for the historic structures and sites</li> <li>• including objectives to develop resilience and adaptation strategies for the built and archaeological heritage in its area.</li> <li>• Developing the skills capacity within the local authority to address adaptation/mitigation/emergency management issues affecting heritage assets</li> </ul>	<p><b>CE Response:</b>                      The submission is welcomed and the contents are acknowledged.</p> <p>Similar points to those raised here were considered during the preparation of the Draft CAP.</p> <p>While an action such as the identification of heritage assets may well sit well within range of other plans produced by the Council, it is considered that the identification of heritage assets is not a core function of the climate action plan.</p> <p>It is considered that the preparation of strategies for the for the built and archaeological heritage would be more appropriate for consideration under a Council Heritage Plan rather than a Climate Plan.</p> <p>It is noted that the Heritage Division of the Department (National Monuments Service and National Built Heritage Service) is engaged with the local authorities through the departmental Climate Change Advisory Group and established Working Groups to ensure a consistent approach to protection and adaptation of heritage assets across the country and an alignment of policies, plans and actions across national, regional and local climate action.</p>

		<p>In relation to particular skills capacity Action 12 of the CAP states "Laois County Council will continue to offer training to its staff and Councillors in the areas of climate change and climate action".</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
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#### 4.10 Submission LS-C73-10

Submission LS-C73-10	Submission Summary	CE Response and Recommendation
Laois Tourism	Submission raised the issue of: A minor alteration to action 109 to insert the time period 2024-2026	<p><b>CE Response:</b>                      The submission is welcomed and contents are acknowledged.                      Inserting the time period requested is considered to be a minor technical change</p> <p><b>CE Recommendation</b>                      After the word “apply” in action 109 to insert the words “over the period 2024-2026”</p>

#### 4.11 Submission LS-C73-11

Submission LS-C73-11	Submission Summary	CE Response and Recommendation
Department of Transport	The submission refers amongst other matters to : the Guidelines for Local Authority Climate Action Plans The Transport chapter of the national Climate Action Plan 2023 (CAP23) Climate Adaptation Strategy for Regional & Local Roads issued by the Climate Action Regional Offices in association with the Department of Transport in April 2023, However there was no comment received specific to the Laois Climate Action Plan	<p><b>CE Response:</b>                      The submission is noted and welcomed.                      However the Department had no specific comment in relation to the Laois Climate Action Plan</p> <p><b>CE Recommendation</b>                      No Change to the Draft Plan</p>

#### 4.12 Submission LS-C73-12

Submission LS-C73-12	Submission Summary	CE Response and Recommendation
Rosie Palmer	Submission raised the issue of: The term “Fossil Fuels” is not mentioned once in the document. I would like to see this addressed in the plan.	<p><b>CE Response:</b> The submission is welcomed and the contents are acknowledged. The need for reduction in greenhouse gas emissions is noted a number of times in the document.</p> <p>No Change to the Draft Plan</p>
Rosie Palmer	Submission raised the issue of: overall strengthening of the language in the plan; for example, using the word “ensure” instead of “persuade”. It is necessary that the language ensures that actions can be monitored and measured with enforcement coming through the legal process, where such an avenue exists.	<p><b>CE Response:</b> The submission is welcomed and the contents are acknowledged</p> <p><i>The submission is somewhat vague. The word “persuade” does not appear in the document.</i></p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
Rosie Palmer	Submission raised the issue of: There is no mention of any plans for a substantial Greenway in County Laois, which would be a significant step forward for Active Travel, and I would like to see this included in the plan. Indeed, the development of dedicated cycling routes can serve commuting patterns in Laois.	The Plan outlines The Triogue Way as an off-road, cross-town active travel route tailored to connect key points of interest in the town, such as parks, schools, and the town centre. Greenways primarily serve leisure purposes and, although they promote cycling, they do not facilitate commuting and thus do not effectively reduce carbon emissions. Action 56 involves piloting "Rothar Roads," which leverage existing infrastructure without the

		<p>carbon-intensive construction materials typically required. Laois County Council will assess appropriate sites for implementing this "Rothar Roads" pilot program. Action 60 refers to permeability routes which will include off road cycling in urban areas environments to reduce travel times to key trip attractors, leading to reduced car dependency.</p> <p>CE Response: No Change to the Draft Plan</p>
Rosie Palmer	<p>Submission raised the issue of: A Bike Hire scheme should be rolled out County wide, and I would like to see this ambition in the plan.</p>	<p>The Decarbonising Zone serves as a testbed for climate adaptation and mitigation initiatives. The Bike Hire Scheme in Portlaoise is a pilot program, and its success could lead to its expansion to other urban centres with a viable population to support the scheme's feasibility.</p> <p>CE Response: No Change to the Draft Plan</p>
Rosie Palmer	<p>Submission raised the issue of: I would also like to see plans for water refill fountains to be incorporated into the bike repair stations, or as standalone features in all of our town and villages.</p>	<p>Action 84 &amp; 98 both support community led climate action projects, if proposed, refill units would be considered as a suitable project.</p> <p>CE Response: It is proposed an additional action will inserted “LCC will develop initiatives aimed at supporting resource efficiency, waste minimisation and the circular economy across the county”</p>
Rosie Palmer	<p>Submission raised the issue of</p>	<p><b>Action 32</b> refers to Local Transport Plans for largest urban centres population over</p>

	:I would like to also see a mention of the significant traffic problem in Abbeyleix and Durrow, and solutions proposed around this issue.	5,000. this is in line with national policy. LCC can fund LTP without national funding.  CE Response: No Change to the Draft Plan
Rosie Palmer	Submission raised the issue of I welcome the acknowledgement of community led projects (such as Abbeyleix Bog Project) which support peatland restoration, rehabilitation and maintenance and similar carbon improvement projects. However, and acknowledging that the Council is not the main landowner of bogs, I would like to see the matter of stakeholders such as BNM, other state agencies, landowners and communities explicitly mentioned. Protection of this vital natural resource also means monitoring, reporting and enforcing legislation on illegal dumping/extraction and sale of turf regulations and on raising public awareness on same.	It is considered that the proposed actions do not fall within the remit of the CAP.  CE Response: No Change to the Draft Plan
Rosie Palmer	Submission raised the issue of ..... I would also like to see reference to more planting of forestry on public lands. I would like to request that Laois County Council commit to identifying small plots of public land for establishment of woodland under the ‘Forests on Public Land’ Scheme / FT3 under the new Forestry Programme. Trees are proven to reduce temperatures on streetscapes during heatwaves and this should be recognised and implemented as a nature-based solution within the plan. We also need to protect those trees we already have.	Laois County Council have already conducted an extensive investigation into the suitability of LCC lands for tree planting under Forests on Public lands as suggested  CE Response: No Change to the Draft Plan
Rosie Palmer	Submission raised the issue of ..... I agree completely with the submission made by Community Gardens Ireland and endorse all of their recommendations.	See responses in Section 4.4



### 4.13 Submission LS-C73-13

Submission LS-C73-13	Submission Summary	CE Response and Recommendation
<p>Abbeyleix Tidy Towns</p>	<p>Submission raised the issue of:                      Abbeyleix - observations on Draft Laois Climate Action Plan 2024-2029</p> <p>Abbeyleix Tidy Towns welcomes this opportunity to input into the consultation on the generally impressive Draft Laois Climate Action Plan 2024-2029. This submission will outline relevant proposals and ideas generated by informal consultation with our members. We note that the proposed plan place strong emphasis on stimulating actions within the Portlaoise Decarbonisation Zone which makes good sense given that it is the main population centre in the county.</p> <p>We do however feel there is also great scope to closely partner with smaller communities such as Abbeyleix and Durrow etc. to develop innovative climate solutions that can be trialled and implemented at appropriate scale within those communities. Indeed, our view is that working in partnership with “pioneer sustainable community” such as Abbeyleix could be instrumental in developing national models of good practice.</p>	<p>The submission is welcomed and the contents are acknowledged.</p> <p>The Decarbonization Zone functions as a testing ground for innovative approaches, yet it doesn't restrict LCC from collaborating with other communities on Climate Action projects. LCC actively supports numerous ongoing projects within Abbeyleix, Durrow and communities across county Laois, demonstrating a broad spectrum of climate action initiatives. Notably, all 111 actions outlined in Chapter 5 have a countywide reach.</p> <p><b>CE Response:</b>                      No Change to the Draft Plan</p>
<p>Abbeyleix Tidy Towns Sustainable Communities Plan</p>	<p>Submission raised the issue of:                      Support Abbeyleix to develop an up to date Sustainable Communities Plan With Emphasis on Active Travel</p> <p>Abbeyleix was selected as a pilot community to deliver a Sustainable Communities Plan in 2011 as part of an initiative by Dept of Environment and Laois County Council.</p> <p>We are now proposing to repeat the process and to deliver an up to date plan which will inform the future development of the community in Abbeyleix over the next decade. We cannot over-</p>	<p>Under Actions 82 &amp; 84 Laois County Council will continue to engage &amp; support community environmental initiatives throughout the county.</p> <p>This submission is a location specific issue and there are wide range of community funding streams which can be applied for such feasibility reports.</p>

	<p>emphasise the important of delivering this new plan for Abbeyleix at this pivotal stage in our evolution as a sustainable community</p>	<p><b>CE Response:</b> No Change to the Draft Plan</p>
<p>Abbeyleix Tidy Towns Tree Strategy</p>	<p>We note that Laois County Council (Theme 3 – Action 63) is developing a tree strategy which is to be welcomed. We feel that this could be complemented by detailed tree plans for a number of communities around the county with an interest in this area. The recent round of biodiversity plans which many communities have completed have been beneficial in framing setting out biodiversity actions. However, it should be noted that detailed tree planting designs were outside the scope of these plans. Our experience in Abbeyleix has shown that the formulation of a detailed tree planting plan would be beneficial. These plans should assess existing land banks and make detailed recommendations for tree planting taking into account issues like future development plans, traffic sight lines etc. etc., . The plans should set out a ‘design and specification’ for hedge planting, woodland block planting (if appropriate), orchard planting and should also identify areas suitable for meadow management. We feel that initiatives like NeighbourWoods and edible landscape projects could be replicated across the county with this approach. While support for new tree planting would be key we would also welcome mechanisms to protect our existing resource of established and veteran trees. We would therefore welcome the undertaking of an audit of existing tree resources across the county along with the formal establishment of a register of tree preservation orders.</p>	<p>The Draft plan contains Action 69 Laois County Council will develop a Tree Strategy to provide the vision and direction for long-term planning, planting, protection and maintenance of trees, hedgerows and woodlands within County Laois whilst taking measures to promote the use of native species over non natives and having due regard for water quality and soil stability issues whilst undertaking the planning process.</p> <p>There are a range of funding schemes whereby community groups can apply for Climate Action projects as per Action 84. such as detailed planting scheme Groups may be assisted in this regards by the Biodiversity Officer.</p> <p><b>CE Response:</b> No Change to the Draft Plan</p>
<p>Abbeyleix Tidy Towns Meadow / Pollinator Project</p>	<p>We welcome the support provided to convert large areas of public grasslands and roadside verges in the decarbonization area of Portlaoise from lawn / short cut grass management to late meadow ‘cut and lift’ management.</p>	<p>This approach will need further research and investigation prior to being rolled out on wider scale as the project identified was not without its challenges</p>

	<p>We are requesting that this support be rolled out to areas and communities around the county. In Abbeyleix for example, we have identified significant areas of public, community and private lands which are suitable for a changeover to this type of management. Moreover, we recently delivered a pilot programme (funded through our own resources) to show how it would work. More details here:                  We need support to continue and to expand this project. An obvious starting point would be to implement an appropriate ‘cut and lift’ regime on the wide road verges on the Northern and Southern approaches to Abbeyleix.</p>	<p><b>CE Response:</b>                  No Change to the Draft Plan</p>
<p>Abbeyleix Tidy Towns                  Support for Sustainable Energy Communities</p>	<p>We welcome the support for Sustainable Energy Communities (SEC) across the county. (Theme 4 - Action 81)                  As the first SEC in Laois, we found the master plan process to be very beneficial and worthwhile. However, our experience has shown that while the Energy Masterplan was useful in framing a generalised plan of action, it did not assist us to develop specifications and costings for individual projects.                  We feel that there is a need therefore to provide follow-up support to communities like Abbeyleix, Durrow and Portarlinton etc. who have engaged with the master plan process by supporting them to proceed to design phase on projects that were identified in the Masterplan.                  This would be essential in developing projects to the stage where they can be presented for funding to the likes of SEAI. It would also help to develop a ‘supply line’ of good quality and properly thought out project for the likes of the Laois Climate Action Fund etc.</p>	<p>The submission is welcomed and the contents are acknowledged.                  Under Action 81, Laois County Council will continue to provide support to Sustainable Energy Communities (SECs) by offering to assist in the preparation of local Energy Master Plans for SEC areas.</p> <p><b>CE Response:</b>                  No Change to the Draft Plan</p>
<p>Abbeyleix Tidy Towns                  Climate Action / Engagement</p>	<p>Abbeyleix partnered with Creative Ireland Laois and Laois County Council to deliver a very innovative climate action project over the Covid period in 2020/ 2021. An overview of the project is provided.</p>	<p>The submission is welcomed and the contents are acknowledged.                  This is a location specific action and LCC can support such a measure under Action 83 Laois</p>

	<p>We would be very open to undertaking a ‘second phase pilot’ in the post Covid era to which would serve as a scalable demonstration project.</p>	<p>County Council will continue to deliver countywide climate related educational and awareness information events, communication campaigns and guidance documentation.</p> <p><b>CE Response:</b> No Change to the Draft Plan</p>
<p>Abbeyleix Tidy Towns Active Travel</p>	<p>We feel that an integrated/ joined up approach is key to this and can only effectively be delivered through a plan as set out above. Ad-hoc standalone initiatives clearly will not work. In terms of active travel projects that are already in development, we welcome the ongoing planning that is underway for the proposed Greenway between Portlaoise, Abbeyleix, Durrow (and beyond). While off road corridors are very desirable, we are also requesting that plans should be developed to extend the existing protected cycle corridor on the N77 (as is currently in place between Durrow and Abbeyleix) northwards to Portlaoise. This would offer a viable car alternative for commuters between Abbeyleix and Portlaoise and could be delivered at relatively low cost while more complex off road options are being progressed. Although less of a commuter route, consideration could be given to extending the protected corridor southwards to Cullohill and beyond. The existing wide roads would readily facilitate this and would also provide tourism infrastructure benefits.</p>	<p><b>This project would need TII approval. It would not be appropriate to commit to this project at this point in the preparation of the CAP</b></p> <p>.</p> <p><b>CE Response:</b> No Change to the Draft Plan</p>
<p>Abbeyleix Tidy Towns Smart Village Initiative</p>	<p>We are requesting support to develop our evolution as a “Smart Village”. Smart villages are communities in rural areas that use innovative solutions to improve their resilience, building on local strengths and opportunities. Our aspiration is to build more skills and to become a model community for how other towns can use internet of things technology in the delivery of public service in a low carbon manner. We are particularly interested in deploying an</p>	<p>Smart Villages is a new innovative approach and would be covered under <b>Action 98</b> Laois County Council will pilot replicable, scalable demonstration projects during the lifetime of this plan</p>

	IoT network based on LoRaWan technology ultimately to enable applications like smart city tools, smart parking, utility monitoring, traffic and air quality monitoring and environmental management etc. etc.	<b>CE Response:</b> No Change to the Draft Plan
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**4.14 Submission LS-C73-14**

Submission LS-C73-14	Submission Summary	CE Response and Recommendation
<p><b>Development Applications Unit</b></p>	<p>The following observations are made by the Department in its role as a statutory authority with overarching responsibility for nature conservation and the nature directives (i.e. the Bird Directive (2009/147/EC) and Habitats Directive (92/43/EEC)). Specifically, the Department would like to make observations in relation to the following Built Environment / Transport climate adaptation actions <b>Action 37 &amp; Action 39</b></p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged. The comments hereunder are separate to (but not in conflict with) the advices the council received under the SEA process.</p>
<p><b>Development Applications Unit</b> <b>The Barrow Drainage District:</b></p>	<p>Drainage Districts are areas where drainage schemes were constructed under the Arterial Drainage Acts for agricultural purposes. The statutory duty for maintaining these schemes, that include 4,600km of river channel nationwide, rests with the Local Authorities, and is funded by the Minister for Housing, Planning and Local Government. The Local Authorities of Laois, Kildare and Offaly (formerly acting through the joint committee known as the Barrow Drainage Board (established under the Barrow Drainage Acts 1927 and 1933)) are responsible for maintaining arterial drainage within the River Barrow and its tributaries from its source in the Slieve Bloom mountains in Co. Laois to the Horse Bridge in Athy, Co. Kildare. As a result, the River Barrow and its tributaries have been heavily modified and channelised. Arterial drainage involves straightening and deepening the natural channel to create a larger, more efficient cross-section that will contain flood flows without over-spill onto the floodplain – reducing natural floodplain connectivity. It also alters natural river flow and can give rise to the accumulation of sediment, often leading to substantial vegetation</p>	<p><b>The submission is welcomed and noted.</b></p> <p>The comments on this submission are in two parts.</p> <p>Part A is based on the premise that the department has misinterpreted what the Council intended by the CAP and in particular Actions 37 and 39. Under the recommendations there are minor amendments to further clarify the original intention within the CAP.</p> <p>Part B is based on a more literal interpretation of the department’s submission and that they had not misunderstood the intention of the actions under the CAP.</p> <p>The council is of the view that Option A is the more likely scenario, but have addressed both options for the sake of completeness.</p>

<p><b>Development Applications Unit Conflict with European and National Legislation:</b></p>	<p>growth instream. This, in turn, can lead to a cycle of repeat maintenance and of repeat vegetation growth The historical aim of the Barrow Drainage District Scheme was to improve land for agriculture and not to protect the built environment / transport infrastructure from fluvial flooding. In accordance with statutory guidance on development of LACAPs, this plan must be evidence-based. Therefore, the Department advises that evidence must be provided showing that all of the proposed drainage is required for the primary purpose of reducing the impact fluvial flooding on transport infrastructure/ build environment. This could include historical evidence of impacts of fluvial flooding on transport infrastructure/ build environment, excluding areas proposed for Flood Relief Schemes by the OPW. Evidence should also be provided that despite the significant threat of ecological damage, all such drainage is justified due to the level of risk to the built environment / transport infrastructure from fluvial flooding.</p> <p>Inappropriate dredging of rivers or streams, while well intentioned, could cause severe damage to elements of river ecology, including salmon spawning grounds and freshwater fisheries, which are protected under the Directive within this SAC. This, in turn, could harm the angling industry and undermine local tourism<sup>3</sup>. Unfortunately, the Barrow has consistently failed to even reach 50% of the Conservation Limit Figure for decades and in recent years the percentage figure has been in the teens only. Physical alteration of waterbodies is listed as a pressure and threat of high importance for salmon and the overall Conservation Status of Atlantic salmon is Inadequate</p> <p>Overall, hydromorphological pressures are the second most significant category of pressures on our waters as identified in the</p>	<p>Part A.</p> <p>The department acknowledges a statutory duty of local authorities to maintain river channels. The department states that the Minister funds this maintenance.</p> <p>Action 39 concerns itself with ensuring that such on-going regular maintenance is both planned, and that such planning is on a multi-year forward basis.</p> <p>Having such maintenance planned in advance allows other parties to better input into the maintenance planning (if required) and better allows for the submission to statutory authorities (such as An Bord Pleanála) for permission or authorisation to execute any of the planned works over which there might be any environmental concerns or a requirement to receive advance external approval.</p> <p>The forward planning also allows for better identification of matters over which there might be any environmental concerns.</p> <p>The text of action 39 makes it clear that the CAP is talking about maintenance actions.</p> <p>The submission from the department would imply (on the basis and to the extent that the Minister for the department funds maintenance works) that the department endorses (or does not object in principle to) maintenance works on river channels; otherwise it would be difficult to understand the</p>
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	<p>Draft River Basin Management Plan for Ireland 2022 - 2027. They impact by causing damage to natural processes and to the structure and functions of habitats and species. Conventional engineering responses to meteorological disturbance, such as increasing arterial drainage, will amplify the effect on river biota by reducing their ecological resilience, highlighting the need for a management response that integrates ecological and societal benefits simultaneously.</p> <p>The Local Authority Climate Action Plan is a key instrument that strengthens the links between national and international climate policy and the delivery of effective climate action at local and community levels, through place-based climate action. The Department recommends that Actions 37 and 39 are screened for maladaptation impacts</p> <p>As outlined in the Department’s comments at SEA scoping stage, increased river drainage works in areas of managed carbon-rich soils in County Laois could lead to increased CO2 emissions. IPCC guidelines indicate that drained organic soils can emit 5.3 tonnes C/ha per year. Increasing drainage in such areas may not align with the Climate Action Plan 2023 which aims to reduce the management intensity of at least 80,000 ha of drained, agricultural, managed, carbon-rich soils by 2030.</p> <p>There are opportunities to reduce drainage intensity or even restore rivers, particularly in areas where intact but degraded raised bogs and Bord na Móna cutaway bog complexes are being fully restored/rewetted, which should be explored. These would be very appropriate climate mitigation actions for the climate impacts of any arterial drainage of peat soils carried out by Laois Co. Co. as part of the River Barrow Drainage District Scheme in the past.</p>	<p>department’s statement of the Minister’s funding of such works.</p> <p>Therefore it is difficult to comprehend a situation where the department would object to better planning of drainage maintenance under Action 39- other than in a scenario where the department has misinterpreted the actions within the CAP.</p> <p>The department mentions inappropriate dredging of rivers in their submission and follow on with impacts that “could” flow from such actions. There is nothing in the CAP to suggest that the Council would even propose to execute inappropriate dredging, never mind receive authorisation from approving bodies ( such as a Bord Pleanála) for such an action.</p> <p>Indeed the department may be aware from more recent applications to An Bord Pleanála as to the types and extents of works of a planned maintenance nature under the Barrow Drainage scheme. Therefore it is most difficult to understand the reference to inappropriate dredging in the department’s submission.</p> <p>Similarly the department should be aware that no new works of the types undertaken by the original Barrow Drainage Board (with at the time statutory basis) have been undertaken in recent years, nor is there any suggestion in the CAP that such works would recommence.</p>
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	<p>The Department recommends that Laois County Council should work in conjunction with the OPW and EPA, as well as LAWPRO and Inland Fisheries Ireland to identify Nature-based Catchment Management Solutions to reduce flooding impacts to Transport Infrastructure/ Built Environment associated with these river catchments as an alternative to river drainage. Such solutions aim to protect water resources and reduce flood risk by restoring or maintaining ecosystems, natural features and characteristics of water bodies using natural means and processes. They also offer a wide range of other benefits including water quality improvement, habitat creation and climate change adaptation and mitigation and would likely assist the Department in achieving the SAC’s conservation objectives.</p> <p>National and international research has shown that slowing the flow of rivers and implementing nature-based solutions in upper catchment areas are effective measures in reducing the extent of flood risks in lower catchment areas and increasing catchment resilience</p> <p>The proposed maintenance as outlined in Actions 37 and 39 run contrary to this approach by increasing the rate of water conveyance through the straightened and drained channels upstream, thus delivering the water more quickly to the lower lying areas downstream. In this regard, Laois County Council should consider the unintended consequences of increasing flooding impacts in the downstream counties and consult with these Local Authorities in relation to the proposed increased drainage works.</p> <p>As advised in the Biodiversity Climate Change Sectoral Adaptation Plan, the cost</p>	<p>Action 37 refers to annual budgets which are non capital in nature. The current works regularly executed are maintenance in nature. To add further clarity to action 37 it is proposed to add the word “maintenance “ so as to read “river drainage maintenance work” .</p> <p>If, under this part A, we read the Department’s submission as being based on a misinterpretation of the CAP actions, the absence of the word “maintenance “ under action 37 may have contributed to that misinterpretation. However a closer examination of the baseline activities by the department could have shown that - given the absence of works of the nature of the original Barrow drainage board and the patterns of recent expenditures- the reference was to maintenance works.</p> <p>The only matter of significance that is included in Action 37 is that increases in funding would be proposed or sought. Given that each budgetary process is independent (in the sense that Councillors must vote on the budget each year) and given that any amounts coming from the central exchequer are outside our control, Action</p>
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<p><b>Development Applications Unit</b> <b>Emissions from Soil Drainage</b></p>	<p>benefit analysis of employing nature-based solutions should always be undertaken before any major operations such as arterial drainage works are embarked on.</p> <p>The Department considers that the only opportunity to assess the proposed drainage as outlined in Action 37 and 39 in its totality at a strategic level is as part of the SEA. Both the SEA ER and Plan should include the details along with a specific description of what maintenance activities will be undertaken in what river channels under its jurisdiction for the duration of the plan (5 years) and the impacts of all drainage works in their entirety must be assessed as part of SEA.</p> <p>Spatial data should be provided showing the location of the drainage works overlain with environmental data (i.e. water quality, qualifying interest habitats and species data, invasive species data) to identify specific environmental issues of concern. The impacts of drainage works on hydromorphology must also be included considering that hydromorphological pressures are the second most significant category of pressures on our waters as identified in the Draft River Basin Management Plan for Ireland 2022 - 2027. A similar process must be carried out in relation to Action 39.</p> <p>The SEA should investigate GHG emissions from drained organic soils which overlap with proposed areas to be arterially drained under Action 37 and 39.</p> <p>In accordance with Article 5 of the SEA Directive (2001/42/EC), the Environmental Report must include any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental</p>	<p>37 is simply one of indicating how future proposals might be framed.</p> <p>Given predicted increased overall volumes and intensities of rainfall events due to Climate Change, and given the increased urbanisation of populations in Laois, together with the level of advance planning proposed, and together with the ever more strenuous and appropriate environmental considerations associated with drainage maintenance works, the level of proposed increase was considered reasonable.</p> <p>Should planned works under the OPW funding - such as Mountmellick, Portarlinton, Clonaslee, Mountrath - come to fruition under the timescale of the CAP such schemes would bring with them their own maintenance cost increases to fall upon the Council budget.</p> <p>The request to screen Actions 37 and 39 for maladaptation under the SEA is noted and was dealt with under the SEA process.</p> <p>However, given that Action 39 speaks about forward planning for maintenance works, and that the department quote “badly planned adaptation actions” when speaking about maladaptation, one would have expected that the department would</p>
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<p><b>Development Applications Unit Nature-based Catchment Management Solutions:</b></p>	<p>importance, such as areas designated pursuant to the Habitats Directive (92/43/EEC).</p> <p>In relation to Action 37, the mitigation arising from the SEA embedded into the LACAP states ‘During the execution of these works, the Council will continue to have due regard to environmental sensitivities at these locations, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology.’ The Department considers that this mitigation is far too vague given the likely impacts of the specific drainage maintenance works which could have been ascertained from a review of existing environment data.</p> <p>The SEA should establish definitive measurable indicators for environmental and particularly biodiversity impacts of arterial drainage. Consequently, monitoring should be embedded into the plan and given clear quantifiable targets.</p> <p>The monitoring programme should be clearly set out and developed in such a manner as to ensure it will identify the effects (both positive and negative) on the environment that are likely to arise, or will arise, and to monitor the effectiveness of any mitigation, if required, on which the assessment relies.</p> <p>It is advisable to clearly set out where responsibilities for monitoring programmes lie, their frequency, their reporting/publication arrangements, as well as the procedures that will be put in place to ensure that there is a response mechanism to any unforeseen or undesirable negative effects/results and an undertaking of remedial action, if necessary.</p>	<p>have welcomed a commitment to planning for drainage maintenance works.</p> <p>The department state that “increased river drainage works...could lead to increased CO2 emissions “. Again it must be emphasised that apart from the OPW schemes (Action 38) no new river drainage works are referenced under the CAP and what is being spoken about is the maintenance works on existing schemes.</p> <p>Therefore any department comments about increasing drainage works in agriculture areas falls away.</p> <p>The department raise the prospect of restoring rivers and BNM bogs. To the extent that reversing the Barrow Drainage works may require a statutory input and a national programme similar to just transition for property owners -including houses and farms - impacted, restoring the Barrow was not considered within the scope of this CAP. Similarly the BNM lands are not under the control of the Council; while we would welcome interaction with BNM the Council cannot commit on their behalf to actions in relation to rewetting bogs.</p>
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<p><b>Development Applications Unit</b>  <b>Matters related to Strategic</b>  <b>Environmental Assessment:</b></p>	<p><b>Matters related to the Natura Impact Report</b>                  Similar to the observations on the SEA, the recommendations integrated into the plan in relation to Action 27 and 29 as outlined on page 50 and 51 of the Natural Impact Report are entirely too vague given that the location, specifications and impacts of the drainage works, which are on-going, are known to Laois County Council.</p> <p>The Appropriate Assessment (AA) is an opportunity to assess the impacts of arterial drainage on the site specific conservation objectives for the River Barrow and River Nore SAC at a strategic level. In conclusion, the Natura Impact Report states that the AA process is ongoing and will inform and be concluded at adoption of the Plan. The Department advises Laois County Council that AA determination must be based on complete, precise and definitive findings which rule out adverse effects to the integrity of the River Barrow and River Nore Special Area of Conservation. Particular attention must be paid to the impacts of arterial drainage as outlined in Actions 37 and 39 when coming to this conclusion.</p>	<p>The department recommend that LCC work in conjunction with OPW, EPA, Lawpro , IFI, to identify nature based catchment solutions. The department is referred to actions 5 and 16 in relation to cooperation with other bodies and to actions 24, 25 and 26 in relation to “greener” solutions generally.</p> <p>The department at the top of page 6 refers to the “proposed drainage “. It must be emphasised again that (with the exception of the OPW schemes) these are existing maintenance programmes, which are in existence separate to this CAP; these are NOT new works being proposed under the CAP. (However the actual works to be carried out cannot be known up to 5 years in advance -as suggested by the department- as such works are subject to vegetative growth patterns and the impacts of storms and the downwash of vegetative brash). The proposals under that CAP are for first of all for additional planning of those maintenance works and secondly to seek additional resources for the reasons already stated.</p>
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<p><b>Development Applications Unit SEA Mitigation:</b></p>		<p>Part B</p> <p>Under this part it is assumed that the Department have not misinterpreted the Council’s direction under the CAP.</p>
<p><b>Development Applications Unit SEA Monitoring:</b></p>		<p>With reference to the statement that the “proposed maintenance as outlined in action 37 and 39 run counter to this approach by increasing the rate of water conveyance” it must be pointed out that the maintenance simply at best maintains flows and does not increase flows beyond the constructed levels. The department has not adduced any evidence that the maintenance currently undertaken increases the level of flow capacity beyond that originally provided. Indeed an examination of the reality of the situation - including where in bed works below the waterline are not undertaken as part of that normal maintenance -might well show that the current style of maintenance does not address the potential long term reduction in drainage flow capacity in the Barrow arising from the deposition of material in the channels.</p> <p>The submission notes that the statutory duty for the maintenance of these schemes lies with the local authorities.</p> <p>The change proposed under the CAP is that there be a proposal to raise the allocation by 1% per annum above inflation over the lifetime of the</p>

		<p>plan. There is no other change proposed in this CAP to the existing maintenance works.</p> <p>The majority of programmed maintenance works carried out under the Barrow Drainage are subject to their own statutory approval processes. To achieve approval to carry out such proposed annual works it needs to be demonstrated that the proposed works have adequately respected environmental considerations.</p> <p>In relation to the statement that “location, specifications and impacts of the drainage works, which are on-going, are known to Laois County Council” it must be pointed out that the purpose of action 39 is actually to prepare regular plans for what is a long term ongoing activity; it must also be pointed out that the majority of the river maintenance works involves removing or trimming vegetation above the water line and removing debris blocking channels; it is not considered reasonable to expect a Plan focused on climate to know up to five years in advance the locations where vegetation would need to be trimmed.</p> <p>It is also noted that the submission requests <i>“Therefore, the Department advises that evidence must be provided showing that <b>all</b> (emphasis added) of the proposed drainage is required for the primary purpose of reducing the impact fluvial flooding on transport infrastructure/ build environment.”</i> However the Department also recognise the statutory duty imposed on local</p>
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		<p>authorities under the Drainage Acts. To that extent there seems to be an unresolved conflict within the Department’s submission.</p> <p>Should the Department require the maintenance works on the Barrow, or other catchments to cease, then that should be explicitly stated. However were such drainage maintenance works (other than for transport or built environment purposes) to be abandoned that would likely lead to the equivalent of “Just transition” for the affected landowners. As matters currently stand the Council is not aware of such a national scheme or such a national policy and it is considered unwise to commit to such action within this CAP without explicit government direction.</p> <p>However it must be emphasised again that the reply on this Part B is (as stated previously) based on a more literal interpretation of the department’s submission. It is included for the sake of completeness, even though the reply in parts A and C would be the replies which more closely match the Department’s intent.</p> <p><b>Part C</b></p> <p>It must also be considered what impact the removal of actions 37 and 39 would have on the CAP and the environment in general. The removal</p>
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		<p>of Action 39 would remove the commitment under the CAP on forward planning for the maintenance programme and the opportunities that presents for better engagements and outcomes resulting from the planning. Removal of Action 39 would not stop the current annual river maintenance activities. The removal of action 37 would not impact on future opportunities for budgetary increases; neither would it alter the pressures and reasons already referred to for potential budgetary increases.</p> <p>It is considered that the CAP is stronger (including from a river/environmental perspective) with these commitment in place. However, in the light of the department’s letter it could be administratively more convenient to omit actions 37 and 39 at the price of a somewhat weakened document.</p> <p>On balance it is considered that Actions 39 and 37 as amended should remain within the CAP document.</p> <p><b>CE Recommendation</b>          For purposes of clarity, it is proposed to amend Action 37 by replacing “river drainage works” with</p>
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		<p>“river drainage maintenance works” in the text of the action.</p> <p>Change the order of the actions so that the previous action 38 is renumbered 37, 39 is renumber 38 and previous action 37 is renumbered 39</p>
<p><b>Development Applications Unit Built Heritage &amp; Archaeology</b></p>	<p>The Department of Housing, Local Government and Heritage (DHLGH) welcomes the publication of local authority draft Climate Change Adaptation Strategy.</p> <p>In the preparation and implementation of the local authority adaptation strategy, there are a number of issues regarding protection of built and archaeological heritage that we recommend be taken into account to identify the heritage assets at risk in its area, assess their vulnerability to climate change, increase their resilience and develop disaster risk reduction policies for direct and indirect risks. For example, it is recommended that the strategies should consider:</p> <ul style="list-style-type: none"> <li>* 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;</li> <li>* Including objectives to carry out climate change risk assessments, including condition assessments, for the historic structures and sites in its area;</li> <li>* Including objectives to develop disaster-risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area;</li> </ul>	<p><b>CE Response:</b></p> <p>The submission is welcomed and the contents are acknowledged.</p> <p>Similar points to those raised here by the department (in relation to built heritage etc) were considered during the preparation of the Draft CAP.</p> <p>While an action such as the identification of heritage assets may well sit well within range of other plans produced by the Council, it is considered that the identification of heritage assets is not a core function of the climate action plan.</p> <p>It is considered that the preparation of strategies for the built and archaeological heritage would be more appropriate for consideration under a Council Heritage Plan rather than a Climate Plan. It is noted that the Heritage Division of the Department (National Monuments Service and National Built Heritage Service) is engaged with the local authorities through the departmental Climate Change Advisory Group and established</p>

	<p>* Including objectives to develop resilience and adaptation strategies for the built and archaeological heritage in its area;                  * 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.</p>	<p>Working Groups to ensure a consistent approach to protection and adaptation of heritage assets across the country and an alignment of policies, plans and actions across national, regional and local climate action.                  In relation to particular skills capacity Action 12 of the CAP states “Laois County Council will continue to offer training to its staff and Councillors in the areas of climate change and climate action”.                  However the provision of any additional training materials by the Department would be welcomed.  <b>CE Recommendation</b>                  No Change to the Draft Plan</p>
	<p>DHLGH will shortly be publishing a new guidance document Improving Energy Efficiency in Traditional Buildings. This guidance will assist retrofitting installers and specifiers in how best to choose and apply energy efficiency measures to the historic building stock. The guidance is also intended to assist building owners and occupants in making decisions about upgrading their buildings, many of which are of architectural heritage significance. It is recommended that all proposed retrofitting projects undertaken or supported by the local authority to buildings of traditional construction should follow the principles and practice set out in that guidance.</p>	<p>Laois County Council welcomes new guidance document Improving Energy Efficiency in Traditional Buildings  <b>CE Recommendation</b>                  No Change to the Draft Plan</p>
	<p>Finally, it is recommended that, where such officers are employed, the Architectural Conservation Officer, Heritage Officer and Archaeologist should be included on the local authority’s Adaptation Steering Group.</p>	<p>The Heritage Officer is a member of the cross-sectoral internal Climate Action Team.  <b>CE Recommendation</b>                  No Change to the Draft Plan</p>

4.15 Submission LS-C73-15

Submission LS-C73-15	Submission Summary	CE Response and Recommendation
<p>Uisce Eireann Sustainable Urban Drainage and Integrated Urban Wastewater Management Plans</p>	<p>We also welcome the Council’s commitment to “provide in-house training for relevant Laois local authority staff on enhancement of biodiversity and applying Nature-Based Solutions (NBS) in undertaking their roles”.</p> <p>We would welcome in particular consideration of the following guidance when considering nature-based solutions and sustainable urban drainage:</p> <ul style="list-style-type: none"> <li>• Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document</li> <li>• National (Infrastructure) Guidelines and Standards Group recent NGSG Circular 1 of 2023,</li> <li>• DMURS Advice Note 5 Road and Street Drainage using Nature Based Solutions Design</li> <li>• Greening and Nature-based SuDS for Active Travel Schemes - National Transport</li> <li>• Guidance for Urban watercourses by Inland Fisheries Ireland.</li> </ul>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged.</p> <p>Recommendations for internal checklist for <b>Action 70</b> are noted.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
<p>Uisce Eireann Urban Wastewater Treatment Directive</p>	<p>We would also like to highlight that the recast Urban Wastewater Treatment Directive (UWWTD), as proposed, includes requirements for the preparation of Integrated Urban Wastewater Management Plans (IUWWMPs) for all agglomerations above 100,000p.e. and for selected agglomerations between 10,000 and 100,000p.e. based on risk. IUWWMPs must include both wastewater and urban runoff drainage</p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged.</p> <p>The comments on the UWWTD and IUWWMPs is noted and if adopted LCC will consider for incorporation into checklist under <b>action 70</b></p> <p><b>CE Recommendation</b></p>

	<p>systems and therefore in the context of Ireland they will need to be integrated plans for assets owned by Uisce Éireann (wastewater network) and the Local Authorities (storm water network). The recast UWWTD includes obligations for the reduction of pollution load from both wastewater and storm water systems (Storm Water Overflows (SWOs) and Urban Runoff respectively). If adopted, the new UWWTD will require collaboration between UÉ and LAs on integrated drainage planning. IUWWMPs should provide the planning basis for climate resilient cities from a drainage perspective including maximizing the benefit from blue-green infrastructure and adoption of smart innovative solutions. Incorporation of blue-green infrastructure through enhanced water cycle circularity decrease water abstraction and enhance our rivers.</p>	<p>No Change to the Draft Plan</p>
<p>Uisce Eireann Water Demand</p>	<p>We 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.</p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged.</p> <p>The comments on the UWWTD and IUWWMPs is noted and if adopted LCC will be considered for incorporation into checklist under <b>action 70</b></p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
<p>Uisce Eireann Energy Efficiency</p>	<p>We welcome the council’s commitment to “Laois County Council will investigate the feasibility of Shared or District Heating in Portlaoise”.</p>	<p>The link between water conservation and climate action will be made in Action 83 Laois County Council will continue to deliver countywide climate related educational and awareness information</p>

	<p>We 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.</p>	<p>events, communication campaigns and guidance documentation.</p> <p><b>CE Recommendation</b>  It is proposed an additional action will inserted “LCC will develop initiatives aimed at supporting resource efficiency, waste minimisation and the circular economy across the county”</p>
<p>Uisce Eireann Circularity &amp; Bioeconomy</p>	<p>Uisce Éireann are eager to collaborate with others in leveraging circularity opportunities to support the development of a sustainable bioeconomy model.</p>	
<p>Potential impacts on UE Water Sources &amp; infrastructure</p>	<p>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. Developers requiring connections should have regard to available capacity and should engage with UÉ via our New Connections process. Planned public realm and transport projects have the potential to impact on Uisce Éireann assets and projects e.g. tree planting, building over of assets, new connections, stormwater separation, requirement to programme upgrade works in advance of road project. We would also request that any development in the vicinity of Uisce Éireann assets (including e.g. tree planning) should be in accordance with our Standard Details and Codes of</p>	<p><b>CE Response:</b>  The submission is welcomed and contents are acknowledged.</p> <p>These considerations will be considered for inclusion in checklist under <b>Action 70</b></p> <p><b>CE Recommendation</b>  No Change to the Draft Plan</p>

	<p>Practise, and Diversion Agreements will be required where an Uisce Éireann asset is diverted or altered. Early engagement in relation to planned projects is requested to ensure public water services and resources are protected, enable Uisce Éireann to plan works accordingly and ultimately minimise disruption to the public.</p>	
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4.15 Submission LS-C73-16

Submission LS-C73-16	Submission Summary	CE Response and Recommendation
<p>Green-Schools</p> <p>Promoting no-idling</p>	<p>Submission raised the issue of:</p> <p>Submission by Green Schools Travel on Promoting no-idling (of vehicles)</p>	<p><b>CE Response:</b></p> <p>The submission is welcomed and contents are acknowledged. It is noted that Green Schools Travel is in a position to support no idling campaigns.</p> <p><b>CE Recommendation</b></p> <p>No Change to the Draft Plan</p>
<p>Green-Schools</p>	<p>Submission raised the issue of:</p> <p>reference to schools ‘primary and secondary schools’ in the Portlaoise Low Carbon Town Charter and that this be adjusted to ‘all schools and education facilities’.</p>	<p><b>CE Response:</b></p> <p>The submission is welcomed and contents are acknowledged.</p> <p>The expansion requested to “all educational facilities” is considered overly broad in the context of the practical implementation of the CAP.</p> <p><b>CE Recommendation</b></p> <p>No change to the draft document</p>
<p>Green-Schools</p>	<p>Submission raised the issue of :</p> <p>Action 71 ‘there will be a presumption under this measure to plant native trees’ and the submission states that this is an open statement without commitment.</p>	<p><b>CE Response:</b></p> <p>The submission is welcomed and contents are acknowledged.</p> <p>The submission seems to seek a change to the word “commitment”. This matter was considered previously and the phrase using “presumption” was used instead of commitment as there may be</p>

		<p>some instances full agreement with residents in relation to native species may not be feasible</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>
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4.17 Submission LS-C73-17

Submission LS-C73-17	Submission Summary	CE Response and Recommendation
LAWPRO	<p>Measures Not Included:</p> <p><b>5.3:</b> Conduct a <b>review of Section 4 Discharge to Water Licences.</b> *</p> <p><b>5.6:</b> Support existing <b>citizen science</b> initiatives including those <b>focusing on water quality.</b> **</p> <p>* Noticeably I seemed to recall in draft form, there was review of fourteen discharge licenses if I am correct in the draft proposals that were presented at Laois Heritage Forum on the 26<sup>th</sup> of September 2023.</p> <p>** Link to supporting communities as exemplars for climate actions within plan which may involve citizen science, so water can be related to that of course but tenuous.</p> <p>Measures that are referenced but could be further addressed/improved:</p> <p><b>2.1:</b> Feasibility assessment Climate &amp; <b>WFD vulnerable waterbodies.</b></p> <p><b>2.2:</b> Conduct an <b>Ecological/Habitat audit of local authority owned land.</b></p> <p><b>2.3:</b> Where tree <b>pits should integrate into the surface water drainage</b> to provide water quality benefits.</p> <p><b>3.1</b> Programme of measures for <b>Council Buildings/Facilities</b> to include <b>Rainwater</b></p>	<p><b>CE Response:</b></p> <p>The submission is welcomed and contents are acknowledged</p> <p>.</p> <p>The Council in the preparation of the Draft CAP had considered an action along similar lines in relation to climate change. However on reflection, such an action was not included in the draft CAP as it was considered that such licences are subject to their own statutory processes.</p> <p><b>CE Recommendation</b></p> <p>No changes proposed</p>

	<p><b>collection/water conservation measures &amp; Nature based solutions.</b></p> <p><b>4.1:</b> The planning application process shall assess the impact of new developments proposed in areas determined to have a <b>water supply and quality constraint.</b></p> <p><b>5.2:</b> A <b>Nature-Based Solutions (NBS)</b> and <b>integrated rainwater management protocol.</b></p> <p><b>5.5:</b> Prepare a <b>guidance</b> document and <b>training</b> on the importance of, quality rating and sustainable management of the hedgerows and <b>riparian areas.</b></p> <p><b>5.7:</b> Develop a <b>Wetland</b> Restoration Plan.</p> <p><b>6.2:</b> Provide <b>training</b> for communities on Climate Action measures e.g., <b>water conservation/ rainwater harvesting, nature-based solutions.</b></p> <p><b>6.3:</b> Identify ways to support <b>grant administrators</b> in their role as influencers of climate action/sustainability and <b>protecting water resources.</b></p> <p><b>6.10:</b> Encourage a community response to enable biodiversity and <b>water conservation in the community.</b></p> <p>Measures Well Covered:</p> <p><b>1.1:</b> Water Sensitive Urban Design (Links to tree strategy here too i.e. shading).</p> <p><b>5.1:</b> <b>Catchment Flood Risk Assessment and Management (CFRAM)Programme</b> identified flood schemes in the county and <b>promote nature-based solutions</b> and integral to these schemes.</p>	
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	<p><b>5.4: Improve biodiversity and water quality</b> levels in keeping with the ‘<b>All Ireland Pollinator Plan</b>’ and as part of this to develop and implement <b>pesticide reduction policy</b> for lands and areas managed by the Council.</p> <p><b>6.1:</b> ‘Sustainability and Climate Change’ scoring on relevant <b>grant assessments</b>. LCDCs/PPNs</p> <p><b>6.11:</b> A climate proofing programme for <b>natural water resources</b>, to better manage flooding at the catchment level, the Council will <b>identify a sub-catchment where water quality objectives are not being met</b>, and where there is an established flood risk. A study will be commissioned.</p> <p><b>6.12:</b> Engage with the ‘<b>Green Club Programme</b>’ through a nominated lead, working with the CARO and GAA.</p> <p><b>6.13:</b> Support artists, organisations, and communities to consider and adopt <b>best practice</b> in their work regarding global challenges such as climate, <b>water</b>.</p> <p><b>9.1:</b> <b>Resolve local flooding issues (Noted with local examples linking to protection projects in Mountmellick, Portarlington, Clonaslee, etc.)</b> utilising OPW and Department of Transport funding (Drainage programme, Climate Adaptation and Resilience Works, OPW Minor Works Scheme) <b>incorporating Nature Based Solutions</b>.</p>	
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**4.18 Submission LS-C73-18**

<b>Submission LS-C73-18</b>	<b>Submission Summary</b>	<b>CE Response and Recommendation</b>
<p>Failte Ireland</p>	<p>Fáilte Ireland is supportive of Local Authority Climate Action Plans (LACAPs) which advocate for climate action in the tourism sector and communities throughout the County. In addition, Fáilte Ireland has called out Driving Climate Action as a key Strategic Priority by helping tourism businesses contribute to targets set out for our industry in the Climate Action Plan. This will be advanced through a range of supports for tourism businesses, including guidance, training, and best practice bespoke advisory at the individual business level. These actions ensure that Failte Ireland is supporting industry and the collective sector to drive change at 3usiness and the destination level, and to deliver on the targets set by Government by ensuring tourism plays its part in reducing greenhouse gas emissions. Failte Ireland also closely cooperates and partners with other state agencies and representative bodies, at local and national levels, to implement and champion positive and practical strategies that will benefit Irish tourism and its adaptation towards a net zero future. Failte Ireland strongly encourages tourism businesses throughout Laois County Council to engage with these supports.</p>	<p><b>CE Response:</b> The submission is welcomed and contents are acknowledged.</p> <p>Under Action 88 Laois County Council will promote and support the development of Eco-Tourism Training for individuals, groups and businesses and we look forward to working in partnership with Failte Ireland at implementation stage.</p> <p><b>CE Recommendation</b> No Change to the Draft Plan</p>

### 5 Summary of Chief Executive’s recommendations for Proposed Modifications

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

Draft CAP Section and Page	Proposed Modifications
Section 3.4	to insert the following text at the end of Section 3.4: “In the implementation of this plan due regard will be had to developments in national high level documents (such as updates to the National Climate Action Plan) and similar local documents (such as the County Development Plan). Implementation plans will include for required mitigation measures and take due regard of other environmental constraints and benefits”
Section 4.3	<p>Replace “A Climate Change Risk Assessment report was commissioned by the Council and the Future Climate Risk Matrix is summarised graphically in Figure 4.1.” by the following text:</p> <p>“A Climate Change Risk Assessment report was commissioned by the Council in accordance with Technical Annex B of the Local Authority Climate Action Plan Guidelines. The Future Climate Risk Matrix from that report is summarised graphically in Figure 4.1.”</p>
Page 76	Correct a typo, remove the word “each” in the following : Following approval of the Laois County Council Climate Action Plan, an Implementation Plan will be developed for <del>each</del> the actions, which will set out in further detail how the action will be delivered including, noting the responsible department and timescales. Laois County Council will align the timing of internal implementation reporting with that of sectoral progress reporting requirements.
Page 28	In Action 15 it is recommended to insert the words “ and to encourage local informed climate actions” after the word “achievements”

Page 31	Change the order of the actions so that the previous action 38 is renumbered 37, previous action 39 is renumbered 38 and previous action 37 is renumbered 39.
Page 31	For purposes of clarity, it is proposed to amend existing Action 37 by replacing "river drainage works" with "river drainage maintenance works" in the text of the action.
Page 31	Existing Action 39 include at end of last sentence "including engagement with relevant statutory bodies as required".
Page 38	In Action 83 it is recommended to insert the words " to encourage local informed climate actions" after the words "guidance documentation"
New Action	It is proposed an additional action will inserted "LCC will develop initiatives aimed at supporting resource efficiency, waste minimisation and the circular economy across the county".
New Action	"Support community based food growing initiatives through the development of community gardening advice guidelines."
Page 42	After the word "apply" in action 109 to insert the words "over the period 2024-2026"
Page 66/Page 72	Proposed change under safe routes to school: SCRTS to SRTS
Throughout	Inclusion of updated graphics and images throughout the LACAP and minor modifications to the layout of the document.

## 6 CONCLUSIONS

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

The Climate Action and Low Carbon Development Act 2015 (as amended) states:

*A local authority climate action plan shall be submitted to the members of the local authority concerned and those members shall, by resolution, within a period of six weeks—*

*(a) approve, or*

*(b) approve, subject to such modifications as they consider appropriate, the local authority climate action plan.*

Therefore the Elected Members have up to 6 weeks to consider this Chief Executive's Report, in accordance with the requirements of the Climate Action and Low Carbon Development Act 2015 (as amended).

It is intended to list the [Draft] Laois County Council Climate Action Plan along with this Chief Executive's Report for consideration at the January 2024 meeting of the Council on 29<sup>th</sup> January.

At that January meeting the members may decide by resolution to

- approve the local authority climate action plan or
- approve, subject to such modifications as they consider appropriate, the local authority climate action plan.
- Or alternatively decide to hold a special Council meeting (at a date no later than six weeks from the date of this report) at which members would approve, or approve with modifications, the plan.

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

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

*Therefore I wish to formally recommend to the Members of Laois County Council that, having considered the draft Laois County Council Climate Action Plan 2024-2029, along with Strategic Environmental Assessment and Appropriate Assessment Screening and Determination, having hereby determined that 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, and having considered this Chief Executive's Report on the Draft Plan and on the public consultation, the Council approve the Laois County Council Climate Action Plan 2024-2029 subject to the Chief Executive's recommendations contained in section 4 of his report and the modifications summarised in section 5 of his report.*

Report prepared through the Climate and Community Section:

\_\_\_\_\_  
Climate Action Co-Ordinator

\_\_\_\_\_  
SEO (Community)

Endorsed by:

\_\_\_\_\_  
Director of Services

Recommended to the Members of Laois County Council by:

\_\_\_\_\_  
Chief Executive

Dated:\_\_\_\_\_




**Appendix A: List of Persons, Organisations and Bodies who made Submissions on Draft Laois Climate Action Plan 2024-2029**

<b>Submission Reference</b>	<b>Name</b>
LS-C73-1	Tim Coleman
LS-C73-2	Environmental Protection Agency (Ireland)
LS-C73-3	Nephin Renewable Gas
LS-C73-4	Community Gardens Ireland
LS-C73-5	Inland Fisheries Ireland
LS-C73-6	Sea Fisheries coordination DAFM
LS-C73-7	Not Here Not Anywhere
LS-C73-8	Global Action Plan
LS-C73-9	Development Applications Unit
LS-C73-10	Laois Tourism
LS-C73-11	Department of Transport
LS-C73-12	Rosie Palmer
LS-C73-13	Abbeyleix Tidy Towns
LS-C73-14	Development Applications Unit
LS-C73-15	Uisce Eireann
LS-C73-16	Green-Schools
LS-C73-17	LAWPRO
LS-C73-18	Failte Ireland

Appendix B: Advertisement

Tuesday, October 31, 2023

**NEWS 11**



**COMHAIRLE CHONTAE LAOISE**  
**LAOIS COUNTY COUNCIL**  
Ara an Chontae, Portlaoise, Co. Laois  
Tel: 057 8664000 Fax: 057 8622313  
corp@laois.ie www.laois.ie

**DRAFT LOCAL AUTHORITY CLIMATE ACTION PLAN 2024 – 2029**  
**SECTION 14 B OF THE CLIMATE ACTION AND**  
**LOW CARBON DEVELOPMENT ACT 2015, AS AMENDED BY**  
**THE CLIMATE ACTION AND LOW CARBON DEVELOPMENT**  
**(AMENDMENT) ACT 2021**

Laois County Council has put its Draft Climate Action Plan out for public consultation. The draft Laois County Council Climate Action Plan covers the period 2024-2029. The Draft Climate Action Plan sets out how the local authority can promote a range of mitigation, adaptation and other climate action measures, to help deliver the Government's National Climate Objective to achieve, by no later than the end of 2050, a transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy.

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

A copy of the Draft Climate Action Plan and associated documents is available to view online at <https://consult.laois.ie/>

The Draft Climate Action Plan may be inspected during public opening hours from Wednesday, 1st November 2023 until Thursday, 14th December 2023 inclusive, at the following location:  
**Ara an Chontae, JFL Avenue, Portlaoise R32 EHP9**

At the following Public Libraries during normal opening hours:  
Mountmellick Library, O'Moore St, Townparks, Mountmellick, Co. Laois R32 PX61  
Portarlinton Library, 2 Main St, Coolederry, Portarlinton, Co. Laois, R32 P9WF  
Abbeyleix Library, Market House, Market Square, Abbeyleix, Co. Laois R32 CY65  
Portlaoise Library, 23 Lower Main Street, Portlaoise, Co. Laois R32 N7EP

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

1. Online via the Council's Public Consultation Portal at <https://consult.laois.ie/>
2. Via Email with "Draft Local Authority Climate Action Plan" in the subject line to [climateaction@laoiscoco.ie](mailto:climateaction@laoiscoco.ie)
3. In writing (marked "Draft Local Authority Climate Action Plan") to:  
Climate Action Co-ordinator, Ara an Chontae, JFL Avenue, Portlaoise, R32 EHP9

Submissions or observations must be made in writing no later than **4pm Thursday, 14th December 2023**. Late submissions will not be accepted.

Please consider the following in making your submission:

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

**Public Information Drop-in Events:**  
Council staff will be available during these times to provide guidance on the Draft Climate Action Plan and on the consultation process, you are welcome to come along to:

Location	Drop-in clinic	Times
Mountmellick Library	Weds 15th	11am - 1pm
Portarlinton Library	Weds 15th	5pm - 7pm
Abbeyleix Library	Thurs 23rd	11am - 1pm
Portlaoise Library	Thurs 23rd	5pm - 7pm

If you require more details, please contact the Climate Action Section at 057 8664265 or email [climateaction@laoiscoco.ie](mailto:climateaction@laoiscoco.ie)

Signed: Donal Brennan  
Director of Services

**Appendix C: List of 4 x Environmental Authorities and all Interested Stakeholders relevant to Laois notified on SEA Scoping for preparation of a new Laois Climate Action Plan 2024-2029**

Environmental Protection Agency	Environmental Authority
Minister for Housing, Local Government and Heritage	Environmental Authority
Department of Environment, Climate and Communications	Environmental Authority
Department of Agriculture, Food & the Marine	Environmental Authority
An Taisce	Interested Stakeholder
Birdwatch Ireland	Interested Stakeholder
Bord na Móna (BnM)	Interested Stakeholder
Climate Change Advisory Council	Interested Stakeholder
Coastwatch	Interested Stakeholder
Department of Enterprise, Trade and Employment (DETE)	Interested Stakeholder
Department of Transport (DoT)	Interested Stakeholder
Electricity Supply Board (ESB)	Interested Stakeholder
Fáilte Ireland	Interested Stakeholder
Gas Networks Ireland	Interested Stakeholder
Industrial Development Authority (IDA)	Interested Stakeholder
Inland Fisheries Ireland (IFI)	Interested Stakeholder

Inland Waterways Association of Ireland (IWAI)	Interested Stakeholder
Landscape Alliance Ireland	Interested Stakeholder
Marine Institute	Interested Stakeholder
Neighbouring Local Authorities	Interested Stakeholder
Office of Public Works	Interested Stakeholder
Eastern and Midlands Regional Assembly	Interested Stakeholder
Sustainable Energy Authority of Ireland (SEAI)	Interested Stakeholder
Teagasc	Interested Stakeholder
Tourism Ireland	Interested Stakeholder

**Appendix D: List of bodies from Appendix C that submitted observations on publication of SEA Scoping Report for Draft Laois CAP**

Minister for Housing, Local Government and Heritage
Department of Agriculture Food and the Marine
Inland Waterways Association of Ireland (IWAI)
Environmental Protection Agency

Appendix E:

Strategic Environmental Assessment and Appropriate Assessment - Determinations

**Modifications to the Draft Local Authority Climate Action Plan 2024 – 2029 for the Laois County Council functional area**

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

Laois County Council has prepared a Draft Local Authority Climate Action Plan (LACAP) for the Council's functional area for the years 2024 – 2029 as required under Section 14b of the Climate Action and Low Carbon Development Act 2015 (as amended).

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

Modifications to the Draft LACAP are proposed to be made following a review of the issues raised during the prescribed public consultation period for the Draft LACAP from 1<sup>st</sup> November to 14<sup>th</sup> December.

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

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

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

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

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

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

**Local Authority Climate Action Plan 2024 – 2029 for the Laois County Council functional area**

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

An Appropriate Assessment (AA) Determination is being made in relation to the potential for the Council's Local Authority Climate Action Plan (LACAP) 2024 – 2029 to have effects on the integrity of European sites.

Article 6(3) of the Habitats Directive, as transposed by S.I. No. 477/2011, as amended, requires that a final determination is made as to whether a plan or project would adversely affect the integrity of a European site.

AA Screening of a draft version of the LACAP (the Draft LACAP) concluded that the Plan was likely to have significant effects on European sites forming part of the Natura 2000 network (*in the absence of mitigation*), either alone or in combination with other plans and projects.

It was concluded a Natura Impact Report (NIR) should be prepared for the Draft LACAP. Careful considerations were required with regard to the technical wording, focus and scope of the actions contained within the Draft LACAP, such that effects are avoided and/or minimised with regard to European sites and their Qualifying Interests and Special Conservation Interests.

A NIR was produced for the Draft LACAP. The NIR considered the potential for the LACAP to adversely affect the integrity of European sites, with regard to their Qualifying Interests and Special Conservation Interests. The Draft LACAP was informed by the AA and a Natura Impact Report was prepared outlining the likely environmental effects of the Plan on European sites in accordance with the Habitats Directive 92/43/EEC. Measures were integrated into the Draft LACAP that mitigate its potential effects on any European site.

Modifications to the Draft LACAP are recommended to be made following a review of the issues raised during a period of prescribed public consultation period for the Draft LACAP from 1<sup>st</sup> November to 14<sup>th</sup> December 2023. Following assessment and having regard to the nature of the Modifications to the Draft LACAP and the potential for likely significant environmental effects associated with the Modifications, it has been concluded based on technical advice received and it is recommended to the Council in view of best scientific knowledge and in view of conservation objectives, that the Modifications to the Draft LACAP will not give rise to any likely significant effects on designated European sites, alone or in combination with other plans or projects. An AA Screening Determination was made in relation to this effect.

Overall, the AA process concluded the following:

- Stage 1 AA Screening and Stage 2 AA of the Laois Local Area Climate Action Plan 2024-2029 has been carried out. Implementation of the LACAP has the potential to result in effects to the integrity of any European sites, if unmitigated.
- The risks to the safeguarding and integrity of the qualifying interests, special conservation interests and conservation objectives of the European sites have been addressed by the inclusion of mitigation measures that will prioritise the avoidance of effects in the first place and mitigate effects where these cannot be avoided. In addition, lower-level plans and projects arising through the implementation of the LACAP may themselves be subject to AA depending on the type of plan or project together with further details of their design and location.
- In-combination effects from interactions with other plans and projects was considered in the assessment and the mitigation measures incorporated into the plan are seen to be robust to ensure there will be no significant adverse effects as a result of the implementation of the LACAP either alone or in-combination with other plans/projects.
- Having incorporated mitigation measures, it is concluded that the Laois County Council LACAP 2024- 2029 is not foreseen to give rise to any significant adverse effects on designated European sites, alone or in combination with other plans or projects. This evaluation is made in view of the conservation objectives of the habitats or species, for which these sites have been designated

In light of the above, it is recommended that Laois County Council, pursuant to Article 6(3) of the Habitats Directive, as transposed by S.I. No. 477/2011, as amended, determines that the adoption and implementation of the LACAP will not individual or in combination with any other plan or project adversely the integrity of any European site.

**Modifications to the Draft Local Authority Climate Action Plan 2024 – 2029 for the Laois County Council functional area**

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

Laois County Council has prepared a Draft Local Authority Climate Action Plan (LACAP) for the Council's functional area for the years 2024 – 2029 as required under Section 14B of the Climate Action and Low Carbon Development Act 2015 (as amended).

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

Modifications to the Draft LACAP are recommended to be made following a review of the issues raised during the prescribed public consultation period for the Draft LACAP from 1<sup>st</sup> November 2023 to 14<sup>th</sup> December 2023. The Draft LACAP was informed by a SEA and an SEA Environmental Report has been prepared outlining the likely environmental effects of the Plan in accordance with the SEA Directive 2001/42/EC. Measures have been integrated into the Draft LACAP that provide for and contribute towards environmental protection, environmental management and sustainable development.

Following assessment of the criteria and having regard to the nature of the Modifications to the Draft LACAP and the potential for likely significant environmental effects associated with the Modifications, it has been concluded based on technical advice received and it is recommended to the Council that the Modifications to the Draft LACAP will not give rise to likely significant effects on the environment.

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

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

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

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