

**Chief Executive's Report on
Submissions Received to the
Draft Kilkenny County Council
Climate Action Plan 2024-2029**

**January 2024
Climate Action Office
(Environment Section)
Kilkenny County Council**

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1.0 Introduction

1.1 Purpose of the Report

Kilkenny County Council prepared a Draft Climate Action Plan 2024-2029, which was published on 16th November, 2023. The Draft Plan sets out mitigation, adaptation and other climate action measures, to be undertaken by Kilkenny County Council, including a 51% reduction in emissions, and 50% energy efficiency by 2030. This is aligned to the Government's overall National Climate Objective, which seeks to pursue and achieve: by no later than the end of 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy.

The Draft Plan includes a range of actions across five Strategic Goals: 1) Governance & Leadership, 2) Built Environment & Transport, 3) Natural Environment & Green Infrastructure, 4) Communities: Resilience & Transition, and 5) Sustainability & Resource Management.

Pursuant to Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021, notice of the preparation of the Kilkenny County Council Draft Climate Action Plan 2024-2029, was given on Thursday 16th November, 2023. Submissions or observations with regard to the Draft Plan and Environmental Reports (Strategic Environmental Assessment and Appropriate Assessment) were invited from Thursday 16th November, 2023 to Wednesday 20th December, 2023, inclusive.

In accordance with the requirements of the Climate Action and Low Carbon Development (Amendment) Act 2021, this Chief Executive's Report summarises and details the outcome of the Public Consultation process on the Draft Climate Action Plan, as follows:

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

This Chief Executive's Report on Submissions Received, and Draft Climate Action Plan, is hereby submitted to the Elected Members of the Local Authority, for their consideration. In accordance with the requirements of the Climate (Amendment) Act 2021, Elected Members will be issued with the Draft Plan and have up to 6 weeks to consider it (and this Chief Executive's Report). Elected Members will be briefed on the 12th February 2024, in particular to provide an overview of the Chief Executive's Report. At the Council Plenary Meeting on 19th February, 2024, the Elected Members will decide by resolution, whether to:

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

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

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

An Environmental Report accompanies the Draft Climate Action Plan. The Environmental Report contains a detailed analysis of the Draft Climate Action Plan, and how the implementation of the Plan would impact on its receiving environment. The Chief Executive's recommendations as set out in this report (including recommendations on the Environmental Authorities submissions detailed in Section 3), have been assessed to determine whether they would have any significant impact on the environment. Taking into account the mitigation measures which have already been integrated into the Draft Plan, it is considered that the modifications proposed on foot of recommendations in this Chief Executive's Report will not have any significant adverse effect on the environment.

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

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

1.3 Background to the Climate Action Plan

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

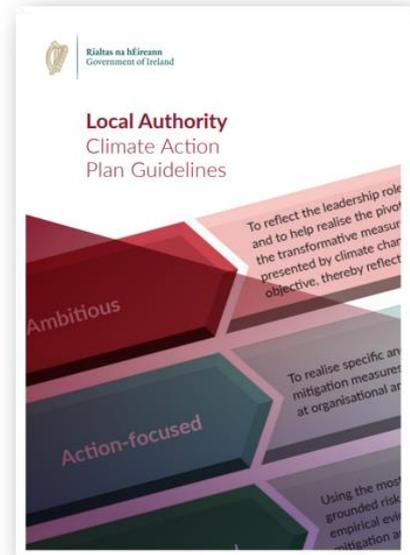
The Draft Climate Action Plan 2024-2029 sets a clear pathway for Kilkenny County Council to:

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

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

The Draft Plan sets out first and foremost how Kilkenny 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;' and secondly demonstrates the Council's broader role of 'influencing', 'coordinating', '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, securing and drawing down available sources of funding, pursuing citizen and stakeholder engagement, all supported by a progressive policy framework.



2.0 The Public Consultation Process

2.1 Outline of the Public Consultation Process

In accordance with the provisions of Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021, the Draft Plan was subject to public consultation. The public consultation ran from 16th November, 2023 to 20th December, 2023 inclusive. The provisions of the Act in relation to public consultation require the local authority to:

- (a) consult and co-operate with adjoining local authorities;
- (b) consult with the Public Participation Network (PPN) 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).

Kilkenny County Council undertook two phases of public consultation in the preparation of the Draft Plan in order to ensure meaningful and comprehensive engagement.

- (i) Pre-Draft Public Consultation (Non-statutory), to raise awareness in preparation for developing the Draft Climate Action Plan,
- (ii) Statutory public consultation on the Draft Climate Action Plan.

2.1.1 Pre-Draft Public Consultation Process

During the Pre-Draft Public Consultation Process, which ran from April to June 2023, members of the public and other interested stakeholders were invited to give their views about what they considered to be the climate action priorities and issues for the Council and the county. It included the following programme of public events and engagements:

- Information stand at Earth Day Kilkenny (22nd April 2023)
- Public notice on the Council's Consultkilkenny.ie portal inviting submissions (May 2023)
- Information stand at Kilkenny Bike Week (14th May 2023)
- Presentation to Kilkenny Tidy Towns Network Annual Meeting (24th May 2023)
- Presentation to Kilkenny Public Participation Network (PPN) Plenary (31st May 2023)
- Interviews on local radio ("Ours to Protect" KCLR, 8th June 2023; "Follow the Leaders" KCLR, 26th May 2023, CKLR 24th August 2023)
- Press releases and social media posts

Review of Plans

In addition to consulting directly with the public, a review of relevant Plans and reports was undertaken by the Climate Action Office to identify issues, which had been raised by the public about climate change in Co. Kilkenny. This included a review of climate-related submissions made to the Council during the preparation of the Kilkenny City and County Development Plan (2021-2027), the Local Economic and Community Plan (2023-2028), and the Kilkenny City Sustainable Urban Mobility Plan (SUMP). It was clear from this review that climate was a key issue for the public and was raised across the public consultations for all plans with a large number of responses raising the issue of climate change received.

An appraisal of the “Climate Conversations” report (DECC, 2022), was also undertaken. This report was a review of responses from public engagement on the ‘National Climate Action Plan 2021’ for the National Dialogue on Climate. Of particular interest was the feedback and suggestions from the Kilkenny Public Participation Network (PPN), provided during a workshop about climate change (31st March, 2021), as part of the National Dialogue on Climate Action initiative.

Collectively these submissions provide a useful barometer of the public’s priorities for climate action in the county. They also served to deepen the Council’s understanding of the issues raised. The submissions and feedback from the public consultation phase were used in particular, to inform the Council in relation to its’ influencing, coordinating, facilitating and advocating role on climate action in the county.

The key themes that emerged from the pre-draft consultation and review were as follows:

- Information (about Grants, Case Studies, Ideas)
- Communication (Jargon free)
- Travel (Sustainable, Public and Active Travel)
- Energy
- Circular Economy (Food, Waste, Materials)
- Economic Opportunities
- Nature-based Solutions
- Just and Fair Transition
- Funding

Consultation for the Kilkenny City Decarbonisation Zone

Stakeholder consultations were also commissioned and undertaken within Kilkenny City as part of the preparation of a Plan for the Kilkenny City Decarbonisation Zone (DZ). This included consultation with the following:

- Kilkenny PPN
- Kilkenny Chamber of Commerce
- Kilkenny Leader Partnership Company
- Kilkenny Tourism
- Elected Representatives from Kilkenny City Municipal District
- Sustainable Energy Communities (SEC’s) in Kilkenny City

Kilkenny County Council Climate Action Steering Committee and Service Areas

A new cross-department Climate Action Steering Committee was established in January 2023 to guide and support the development and implementation of the Plan. It is composed of heads of service, key personnel representing every service area in the Council, and a representative of the South East Energy Agency. The Committee met on six occasions during the preparation of the Draft Plan.

In addition, in order to ensure robust cross-department collaboration, input in the preparation of the Plan, and ownership of actions, the Climate Action Office ran workshops with each service area and key personnel throughout the Council. A total of 25 climate action planning workshops were held with between July and September 2023.

2.2 Details of the Statutory Public Consultation Process

The public consultation process on the Draft Plan comprised the following key elements:

2.2.1 Display of the Draft Plan and supporting documents

The documents which were put on public display were:

- **Draft Kilkenny County Council Climate Action Plan 2024-2029, and the following supporting documents:**
 - Kilkenny Climate Change Risk Assessment
 - County Kilkenny Baseline Emissions Inventory
 - Kilkenny City Decarbonisation Zone Baseline Emissions Inventory
 - Kilkenny City Decarbonisation Zone Plan
 - Public Notice
 - Climate Action Department Data Privacy Statement
- **Strategic Environmental Assessment**
- **Natura Impact Report**

The documents went on public display on the Kilkenny County Council consultation portal Consult.Kilkenny.ie from 16th November 2023 to 20th December 2023. Hard copies of the Draft Climate Action Plan were also made available for public display in libraries and Council buildings, at the following locations, during the display period:

- County Hall (Environment Section)
- Callan Library
- Castlecomer Library
- Kilkenny City Library
- Ferrybank Library
- Graiguenamanagh Library
- Loughboy Library
- Thomastown Library
- Urlingford Library

Public Notice

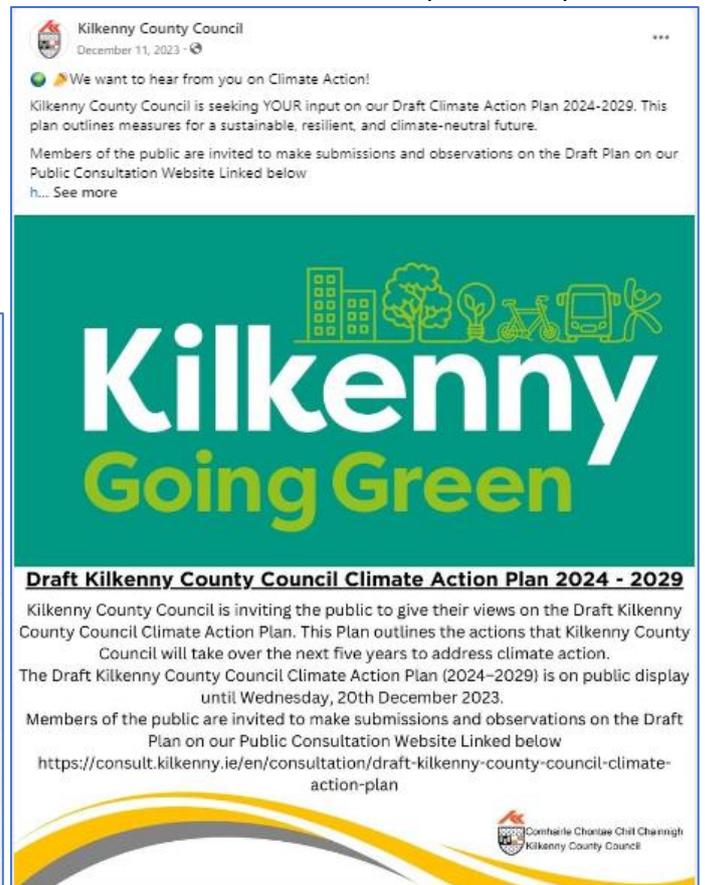
A Public Notice was published in two local newspapers i.e. The Kilkenny People and The Kilkenny Observer. See Appendix 1 of this report for a copy of the Public Notice.

Press Release

A press release about the Draft Plan, including details on how to make submissions, was issued on 16th November, 2023.

Social Media

The social media platforms of Facebook and Instagram were used throughout the public consultation period of the Draft Kilkenny County Council Climate Action Plan, in partnership with the Communications Department of the Council. From the 16th November to 18th December 2023 a total of 19 posts were shared on Facebook and Instagram with details of the Climate Action Plan, and how to make submissions.



Examples of social media posts shared by Kilkenny County Council

Website

A dedicated Climate Action [webpage](#) was developed on the Kilkenny County Council website to provide information on the Draft Plan and how to make submissions. It included a link to the consult.kilkenny.ie portal.

Video

The Climate Action Office produced a short video outlining the work that Kilkenny County Council is doing to address climate action, as context for the Draft Climate Action Plan. The video was hosted on the Kilkenny County Council YouTube channel and received 289 views from 10th October, 2023 to 18th January, 2024. It was also promoted on the Kilkenny County Council Facebook page. An advert ran from 24th November to 20th December, 2023. It had a reach of 20,263; 47,109 impressions; and 154 link clicks.



Climate Action video produced by Kilkenny County Council



Kilkenny County Council Climate Action Objectives

2.3 Public Information Events

During the public consultation period, a number of Public Information Events/drop-in clinics were organised, as follows:

- Ferrybank Library: 21st Nov 2023 (10.30 - 12.30). This was a joint collaboration between Kilkenny County Council and Waterford County Council Climate Action Offices.
- Kilkenny City Library: 23rd Nov 2023 (10.30 - 12.30)



Kilkenny County Council Climate Action Team at public drop in clinic at Ferrybank Library 21st November 2023

2.4 Engagement with Key Stakeholders

PPN Webinar

The PPN is identified as a key stakeholder in the preparation of the Climate Action Plan in the Climate Action and Low Carbon Development (Amendment) Act 2021. In this regard, the Climate Action Office ran a webinar, kindly hosted by Kilkenny Public Participation Network, on 22nd November, 2023, which was open to all PPN members and the general public. The Climate Action Co-ordinator gave a presentation on the Climate Action Plan and how to make submissions, followed by a presentation from the Community Climate Action Officer about the Community Climate Action Fund. A question and answer session followed. The webinar was recorded and a link to the recording was provided on the Climate Action webpage of the Kilkenny County Council website for anyone who hadn't been able to attend. See [Public Participation Network Webinar Wednesday 22nd November, 2023, 19:00 - 20:00\(Passcode: 432011\)](#).

Email correspondence

An email was issued on 16th November, 2023 to statutory bodies, other relevant stakeholders, community groups and individuals informing people of the Draft Plan and inviting submissions. The email was issued to approx. 970 organisations and individuals as follows:

- Prescribed Environmental Bodies
- Elected Representatives and all staff of Kilkenny County Council
- TD's & Senators for Kilkenny
- Strategic Policy Committees of Kilkenny County Council (x5)
- Adjoining Local Authorities & Southern Regional Assembly
- Climate Action Regional Office
- Relevant national organisations and public sector bodies
- Kilkenny County Council Climate Action Steering Committee
- Community organisations including PPN, Ossory Youth, Tidy Towns, Men's Sheds, Sustainable Energy Communities etc
- Kilkenny Local Community Development Committee and County Kilkenny Leader Partnership
- Local business networks/bodies e.g. Chamber of Commerce, Kilkenny Tourism
- Primary and Secondary Schools, Kilkenny Carlow Education Training Board, Kilkenny Education Centre, South East Technological University, Piltown Agricultural College
- Managers of Kilkenny County Council public databases e.g. Libraries, Healthy Ireland, Local Enterprise Office, Community Section for circulation

Engagement with Elected Representatives

The Elected Representatives of Kilkenny County Council, along with the Strategic Policy Committees (SPC's) have a vital role to play in the preparation, adoption, implementation and monitoring of the Plan. The Climate Action Office undertook extensive engagement with the Elected Representatives and relevant SPC's throughout all phases of the preparation of the Draft Plan. A meeting was also held with the Municipal District (MD) of Kilkenny City

specifically in relation to the Kilkenny City Decarbonising Zone. Table 1 below lists all meetings and workshops with Elected Representatives throughout the preparation of the Draft Plan.

Meeting	No.	Date
Council Plenary Meetings	6	17 th October 2022 20 th March 2023 15 th May 2023 27 th July 2023 16 th October 2023 19 th February 2024
Workshop with Elected Representatives	2	11 th September 2023 12 th February 2024
Municipal District of Kilkenny City (in relation to the Kilkenny City Decarbonisation Zone)	1	8 th December 2023
SPC4 (Environmental Protection, Climate Action and Energy)	4	13 th October 2022 6 th April 2023 18 th July 2023 7 th February 2024
SPC2 (Transport Policy, Mobility Management and Water Services)	1	01 st December 2022
Total	14	

Table 1: Meetings and Workshops with Elected Representatives for the preparation of the Draft Plan

3 .0 Submissions Received

3.1 Introduction

Submissions to the Draft Plan could be made either:

- Online at the consult.kilkenny.ie portal
- Via email to climate@kilkennycoco.ie
- In writing to Kilkenny County Council, Draft Climate Action Plan, Climate Action Co-Ordinator, Kilkenny County Council, Patricks Court, Patrick Street, Co. Kilkenny

A total of 30 valid submissions were received, in response to the publication of the Draft Plan. In addition, comments were also received from the Department of Transport and the Climate Action Regional Office (CARO), Eastern and Midlands Region. As both the Department of Transport and the CARO are key national stakeholders in the delivery of climate action, in partnership with the local authority, their comments were considered and are included in this report. Therefore, in total 32 submissions and comments are addressed in this report. the breakdown of which is set out below.

The submissions were grouped into the following categories:

- i. Statutory Environmental Consultees
- ii. Adjoining Local Authorities
- iii. Government Departments and National Organisations
- iv. Voluntary, Representative and Development Organisations
- v. Community groups and individuals

3.2 List of Persons, Organisations and Bodies who made Submissions

Appendix 2 lists the persons, organisations and bodies that made written submissions. Each submission has been assigned a unique reference number.

3.3 Submissions Summary, Chief Executive’s Consideration and Recommendations

There were 32 valid submissions and comments/observations received for the Draft Kilkenny County Council Climate Action Plan; these were read, analysed and summarised. A total of 290 issues were identified from the submissions and observations received. Table 2 below sets out the number of broad issues that were raised according to the submission group type.

Submission Organisation/Group Type	Number of Submissions	% of Issues Raised
Statutory Environmental Consultee	4	10%
Adjoining Local Authorities	1	2%
Government Departments and National Organisations	8	34%
Voluntary, Representative and Development Organisations	6	40%
Community Groups and Individuals	13	14%
Total	32	100%

Table 2: Number of Submissions and % of Issues Raised by Group Type

The methodology used for addressing submissions was that as outlined in the Local Authority Climate Action Plan Guidelines (DECC, 2023). As such, the issues raised in the submissions were considered *“in the context of the scope of both the climate action plan, the local authority role on climate action, relevant national climate policy and the prioritisation of actions.”*

This Chief Executive report seeks to incorporate additional provisions where they are relevant to the purpose of the Plan and its implementation, and do not have a negative impact on the broader environmental considerations of the area.

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

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

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

Having considered each issue, a recommendation was made which describes how the Draft Plan has taken account of the issue, whether it should be amended to take account of the issue, or whether the issue falls outside the scope of the Plan.

Table 3 below summarises all of the issues raised in the submissions and observations together with the responses to same.

Table 3: Submissions and Responses

Submissions from Prescribed Environmental Authorities

Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-18	Department of Housing, Local Government and Heritage	<p>1. The key focus is on the built and archaeological heritage. The submission welcomes the Plan and draws attention to the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage 2019. It refers to existing engagement with local authorities through the Departmental Climate Change Advisory Group and working groups, and anticipates ongoing engagement with local authorities on the implementation of Sectoral Adaptation Plans.</p> <p>2. Recommends that the Plan should consider identifying the built and archaeological heritage assets in the county.</p> <p>3. Recommends that the Plan should consider carrying out climate change risk assessments, including condition assessments, for historic sites and structures in the county.</p> <p>4. Recommends that the Plan should consider developing disaster-risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in the county.</p> <p>5. Recommends that the Plan should consider developing resilience and adaptation strategies for built and archaeological heritage in the county.</p>	<p>Response: Kilkenny County Council welcomes the submission from the Department of Housing, Local Government and Heritage.</p> <p>1. Noted</p> <p>2. Data on these assets is addressed in the Kilkenny City and County Development Plan 2021-2027.</p> <p>In addition, Action 4.3 of the Draft Plan addresses this as follows: <i>“Work with communities to identify, map and record local cultural heritage sites/ areas/ traditions/ practices where loss due to climate change is likely/inevitable”</i>.</p> <p>3. Action 2.27 of the Draft Climate Action Plan addresses this, i.e. <i>“Undertake a Climate Risk Assessment of local authority owned heritage assets”</i>. This will be undertaken in accordance with guidance to be produced by the Department of Housing, Local Government and Heritage.</p> <p>4. The Plan includes actions, which will serve to minimise and manage climate related disaster risk, as follows: Action 1.9: <i>Deliver Flood Relief Schemes under the Catchment and Flood Risk Assessment Management (CFRAM) Programme, and Minor Flood Mitigation Works, incorporating nature-based solutions, where possible, whilst having appropriate regard to environmental protection requirements associated with flood</i></p>

6. Recommends that the Plan should consider developing 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.

7. Recommends that all retrofitting projects undertaken or supported by the local authority to buildings of traditional construction should follow the guidance in "Improving Energy Efficiency in Traditional Buildings", a new guidance document to be published shortly.

8. Recommends that the Architectural Conservation Officer and Heritage Officer be included on the Council's (Climate) Steering Group

*resilience development. **Action 1.10:** Develop and implement an enhanced Flood Forecasting and Monitoring System.*

In addition, **Action 2.27** of the Plan regarding climate risk assessments (see item 3 above) is relevant in this regard. As such, it is recommended that Action 2.27 be modified as follows: **"To develop a policy on Disaster Risk Management and ~~To~~ undertake Climate Risk Assessments of Local Authority owned heritage assets"**.

5. Grant programmes administered by Kilkenny County Council, such as the Community Monuments Fund, Built Heritage Investment Scheme and Historic Structures Fund, address resilience and adaptation of the built and archaeological heritage. It is recommended that Action 4.1 be modified to refer to this, as follows: Action 4.1: *Support communities to deliver local climate and sustainability actions, through **grant schemes and** programmes such as Sustainable Energy Communities, Tidy Towns, GAA Green Clubs, Green Schools and Heritage in Schools, Heritage Week, **Heritage Grants**, National Biodiversity Week, Creative Ireland and Cruinnui na nOg." It is further recommended that an additional KPI be included in this action as follows: **"Number and value of heritage grants provided to support climate resilience and adaptation under the Community Monuments Fund, Built Heritage Investment Scheme, and Structures at Risk Scheme etc."***

6. **Action 1.2** of the Draft Climate Action Plan addresses this as follows: *"Provide climate action training, capacity building and knowledge sharing to Council staff and Elected Representatives"*.

		<p>7. Action 2.30 of the Draft Climate Action Plan addresses this i.e. <i>“Ensure best practise in energy efficiency retrofitting of traditional/heritage buildings”</i></p> <p>8.The Architectural Conservation Officer and Heritage Officer are both members of the Climate Steering Action Committee.</p> <p>Note: All relevant submissions were issued to Fehily Timoney for review and consideration. Please refer to the SEA Environmental report that accompanies the Draft Plan and the Strategic Environmental Assessment Screening report of modifications proposed. It is concluded that the proposed modifications to the Draft Plan will not result in the occurrence of any additional environmental impacts not previously considered or mitigated against in the Draft Plan.</p> <p>CE Recommendation: Propose modifications to the wording of two existing actions (i.e. Action No’s 2.27 and 4.1.).</p>
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Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-8	Environmental Protection Agency (EPA)	1. The submission is in response to the Draft Climate Action Plan and associated SEA Environmental Report. It notes that the EPA is a statutory environmental authority under the SEA Regulations. Comments focus on the EPA’s remit and areas of expertise, in particular water, air, climate change, waste, resource efficiency, noise, radon and the inter-relationships between these and other relevant topics e.g. biodiversity.	<p>Response: Kilkenny County Council welcomes the submission from the Environmental Protection Agency.</p> <p>1. Noted and agreed. The Draft SEA Environmental Report has defined Environmental Governance Principles and action amendment suggestions to ensure that climate action co-benefit opportunities are maximised. Various defined mitigation measures serve to promote win-win solutions.</p>

	<p>2. It recognises the role of the Plan to address climate action at a local level, including meeting local authority energy and emissions targets.</p> <p>3. It recommends that the Council ensures that there are sufficient suitable monitoring networks to facilitate decisions on how to adapt. Also, to ensure that monitoring arrangements remain fit for purpose, such that the data generated from monitoring, can be used by decision makers such as the Council emergency planning team or Met Eireann flood forecasting team.</p> <p>4. It recommends that KCC takes into account the EPA's Climate Change in the Irish Mind project, part of the National Dialogue on Climate Action.</p> <p>5. Recommends that the SEA should assist in identifying ways to maximise the potential co-benefits of climate related measures for air quality, human health, biodiversity, water quality and other interrelated areas (i.e. win-win solutions).</p> <p>6. Recommends that the findings of the SER, ER and NIR are fully reflected in the Plan.</p> <p>7. Lists the Environmental Authorities that the Council is required to consult with under the SEA Regulations.</p>	<p>2. Noted.</p> <p>3. The Climate Action Steering Committee and Climate Action Office will be responsible for monitoring delivery of the Plan. Monitoring of actions and utilisation of monitoring data is comprehensively addressed in the Plan through the following actions:</p> <p>Action 1.5: <i>Internal Audit monitoring of the management, reporting and delivery of statutory targets related to climate change/climate action within all relevant Service Areas in the Council.</i></p> <p>Action 1.6: <i>Monitor, Report and Communicate on delivery of Kilkenny County Council climate actions and targets.</i></p> <p>Action 1.10: <i>Develop and implement an enhanced Flood Forecasting and Monitoring System.</i></p> <p>Action 1.11: <i>Annual review of Kilkenny County Council's Emergency Response Protocol for severe weather events, and Kilkenny County Councils Risk Register.</i></p> <p>Action 1.12: <i>Review and update flood baseline data to inform Flood Relief Project Design.</i></p> <p>Action 2.21: <i>Implement an all-of-Council monitoring programme to track and report on energy use and emissions in all Kilkenny County Council assets.</i></p> <p>4. Noted. This has been addressed in the Pre-Draft Consultation Phase of the Plan (Section 1.6 of the Plan).</p> <p>5. Noted and agreed. The Draft SEA Environmental Report has defined Environmental Governance Principles and action amendment suggestions to ensure that climate action co-</p>
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8. Comments on the Environmental Report.

8(a) Ensure that the Non-Technical Summary of the SEA Environmental Report includes relevant information as required under Schedule 2 of S.I. No. 434 of 2004 as amended.

8(b) Recommends that the Plan contains a commitment to remain aligned with high level plans and programmes, Guidelines, and legislation over its lifetime; and to consider any relevant updated actions, measures or recommendations that may arise in updates to the National Climate Action Plan (or the National Planning Framework) over the lifetime of the Plan.

8(c) Recommends that the Strategic Environmental Objectives reflect the Plan being prepared rather than generic objectives.

8(d) The alternatives considered in the SEA are noted and acknowledge the preferred option selected.

8(e) Where the potential for likely significant effects has been identified, provide appropriate mitigation measures to avoid or minimise these. Also ensure that the Plan includes clear commitments to implement the relevant mitigation measures.

8(f) The Monitoring Programme should take account of specific environmental issues and unforeseen adverse impacts that may arise. It should address the possibility of cumulative effects, positive and negative effects, and should set out the various data sources, monitoring frequencies and responsibilities. Where adverse impacts are identified during the

benefit opportunities are maximised. Various defined mitigation measures serve to promote win-win solutions

6. Noted and agreed. All relevant submissions were issued to Fehily Timoney for review and consideration. Please refer to the SEA Environmental report that accompanies the Draft Plan and the Strategic Environmental Assessment Screening report of modifications proposed. It is concluded that the proposed modifications to the Draft Plan will not result in any additional environmental impacts, not previously considered or mitigated against in the Draft Plan.

7. Noted. All listed Environmental Authorities have been consulted.

8(a). It is assumed that SI No. 434 is a typo and SI No. 435 is what was intended to be addressed with this statement. The requirements of Schedule 2 of SI No 435 have been noted and amendments to the Non-Technical Summary of the SEA Environmental report will be made as appropriate.

8(b) **Action 1.19** of the Plan anticipates and addresses this as follows: *“Respond to new priorities and programmes that emerge over the lifetime of the Local Authority Climate Action Plan, having due regard to environmental sensitivities, biodiversity, European sites, human receptors, and the need to promote sustainable practices”*. In addition, it is proposed to include a new paragraph to Section 2.3 of the Plan (Climate Policy) as follows: **“The Plan will remain aligned with high level plans and programmes, Guidelines, and legislation over its lifetime. Kilkenny County Council will consider any relevant updated actions, measures or recommendations that may arise in updates to the National Climate Action**

implementation of the Plan, ensure that suitable remedial action is taken.

8(g) Recommend that a commitment is made in the Plan, to take account of any relevant recommendations in the EPA's State of the Environment Report 2024, once published, in implementing the Plan over its lifetime.

8(h) Once the Plan is adopted, prepare a SEA Statement, and send a copy of the Statement to any environmental authority consulted during the SEA process.

8(i) Screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the "environmental assessment" of the Plan.

Plan (or the National Planning Framework) over the lifetime of the Plan".

8(c) The Strategic Environmental Objectives defined have been very specifically defined to reflect the themes, goals, objectives and climate action contained in the Plan and in light of the potential environmental effects associated with Plan implementation.

8(d) Noted.

8(e) All mitigation measures have been incorporated into the Actions, as recommended and as such will be implemented.

8(f) Addressed in the SEA Environmental Report.

8(g) Noted. Addressed in 8(b) above.

8(h). Noted. This will be done.

8(i) Noted.

Note: All relevant submissions were issued to Fehily Timoney for review and consideration. Please refer to the SEA Environmental report that accompanies the Draft Plan and the Strategic Environmental Assessment Screening report of modifications proposed. It is concluded that the proposed modifications to the Draft Plan will not result in the occurrence of any additional environmental impacts not previously considered or mitigated against in the Draft Plan.

CE Recommendation:
Minor amendment to Plan to include a paragraph in Section 2.3 re alignment of Plan and actions to future high levels plans, policies, guidelines and legislation.

Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-10	Department of Agriculture, Food and the Marine	<p>1. The submission is in response to the SEA scoping report. It specifically references the seafood industry (fishing and aquaculture). It outlines the economic importance of and challenges facing Ireland's seafood industry and the demand on the marine space from Offshore Renewable Energy, Marine Spatial Planning, Marine Protected Areas etc</p> <p>2. It notes that seafood industry will, through the sectoral Adaptation Plan (Agriculture, Forest and Seafood Climate Change Sectoral Adaptation Plan) and National Climate Action Plan, support sustainable resource use, including through bio and circular economy initiatives. These Plans require consideration in the SEA process.</p> <p>3. It refers to the energy transition of the fisheries and aquaculture sector to climate neutrality by 2050, through the Energy Transition Partnership (ETP) as proposed under the European Commission's Fisheries Policy Package.</p> <p>4. It recommends that Local Authorities include relevant steps to support a Just Transition for the sea fisheries and aquaculture sector in Climate Action Plans.</p>	<p>Response: Kilkenny County Council welcomes the submission from the Department of Agriculture, Food and the Marine.</p> <p>1. Noted. It is noted that Kilkenny is a non-coastal county, but has access to the sea via Belview Port and Rosbercon, and also hosts inland aquaculture enterprise(s).</p> <p>2. Noted. This has been addressed in the SEA Environmental Report (Section 7).</p> <p>3. Noted.</p> <p>4. The Plan supports just transition for all sectors.</p> <p>Note: All relevant submissions were issued to Fehily Timoney for review and consideration. Please refer to the SEA Environmental report that accompanies the Draft Plan and the Strategic Environmental Assessment Screening report of modifications proposed. It is concluded that the proposed modifications to the Draft Plan will not result in the occurrence of any additional environmental impacts not previously considered or mitigated against in the Draft Plan.</p> <p>CE Recommendation: No change to the Draft Plan.</p>

Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-29	Department of Environment,	1. The submission references the obligation of local authorities, under the Climate Action and Low Carbon	Response:

	Climate and Communications (DECC)	<p>Development (Amendment) Act 2021, to prepare a Local Authority Climate Action Plan, the Local Authority Climate Action Plan Guidelines launched by the Minister to assist in preparing the Plans, and outlines the scope and aims of the Plans.</p> <p>2. It references a monitoring and reporting system to support Climate Action Plans which will be developed by DECC in collaboration with the local government sector. It also references support from DECC for Climate Action staff in local authorities, a Service Level Agreement with Climate Action Regional Offices, and climate action training for local authorities.</p> <p>3. It commends the local authority on the work and leadership on climate action, and looks forward to supporting delivery of the Plan.</p>	<p>Kilkenny County Council welcomes the submission from the Department of Environment, Climate and Communications</p> <ol style="list-style-type: none"> 1. Noted 2. Noted 3. Noted <p>CE Recommendation: No Change to the Draft Plan.</p>
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Submission from Adjoining Local Authorities

Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-11	Waterford City and County Council (WCCC)	<ol style="list-style-type: none"> 1. The submission welcomes the Plan, and offers to assist and collaborate with Kilkenny County Council on actions, particularly transboundary actions. 2. It welcomes actions in Strategic Goal 2 of the Plan (Built & Transport) regarding cycle network, active travel, and park & ride, and will look to engage with Kilkenny 	<p>Response:</p> <p>Kilkenny County Council welcomes the submission from Waterford City & County Council, and the opportunity to maximise effective climate action delivery by working in partnership, including in the area of Ferrybank.</p>

		<p>County Council on them, particularly in relation to the shared area of Ferrybank.</p> <p>3.It welcomes actions relating to Strategic Goal 3 (Natural Environment & Green Infrastructure) regarding tree strategy, woodland and hedgerow protection, invasive species, and pollinators, and will liaise with Kilkenny County Council on them.</p> <p>4. WCCC will collaborate and share knowledge with Kilkenny County Council in relation to implementation of their Decarbonisation Zone (DZ).</p> <p>5. WCCC will work with Kilkenny County Council in shared areas/locations of responsibility to ensure that communities can deliver climate action through programmes such as the Community Climate Action Fund, Tidy Towns, GAA Green Clubs and Green Schools.</p>	<p>1. Noted and welcomed. Collaboration with adjoining local authorities is addressed in Action 1.8 of the Plan as follows: <i>“Collaborate with national, regional and local stakeholders and partners on climate action delivery”</i>.</p> <p>2. Noted.</p> <p>3. Noted.</p> <p>4. Noted.</p> <p>5. Noted.</p> <p>CE Recommendation:</p> <p>No Change to the Draft Plan.</p>
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Submissions from Government Department and National Organisations

Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-21	Inland Fisheries Ireland (IFI)	1. The submission outlines the statutory responsibility of IFI to protect, manage and conserve the inland fisheries resource. It details the status of surface water and transitional water bodies in the county. It outlines the water quality status of surface water and transitional waters in the county relative to the Water Framework Directive Objectives, and the designated status of the waterbodies and status of some protected species.	<p>Kilkenny County Council welcomes the submission from Inland Fisheries Ireland (IFI).</p> <p>1. Noted.</p> <p>2. The SEA Environmental Report recommended a suite of mitigation measures in response to climate actions considered to have potentially significant environmental</p>

2. The submission requests that the actions in the Plan are consistent with the maintenance/restoration of water bodies to at least good Ecological Status, and where relevant, with achieving conservation objectives within designated areas, and that actions impacting watercourses be aligned with the latest research and guidelines.

3. The submission outlines the impacts of climate change on fish species and aquatic habitats. It states that the climate impacts will exacerbate existing pressures on aquatic life, and it outlines the current risk of extinction of native fish species.

4. The submission notes the statutory role of the Council in relation to water quality under the Planning and Development Acts, the Local Government (Water Pollution) Acts and the Good Agricultural Practices Regulations.

5. Requests that a KPI on the number of water bodies achieving High or Good Ecological Status as defined by the Water Framework Directive within the life-cycle of the Climate Action Plan be considered for the Plan.

6. The submission outlines the obligations of local authorities to notify IFI in relation to works, and requests that where a proposed activity or development has potential to have a significant effect on the biological, hydro morphological or chemical status of a watercourse, it is referred to IFI in accordance with the legislation. It further advocates for the application of the precautionary principle when considering fisheries and aquatic resources.

effects, including on receiving waterbodies. These mitigation measures have now been incorporated into the actions in the Draft Plan.

Environmental Governance Principles have been defined for the purpose of underpinning and framing the defined climate actions. All activities and development supported by the defined climate actions shall be undertaken or influenced by the local authority, as appropriate, in accordance with these Environmental Governance Principles. Attention is drawn, in particular, to EGP 5: *“Promote the carrying out of climate action related projects underpinned by the plan in a manner that supports climate action water quality co-benefits, and the achievement of Water Framework Directive objectives”*.

Furthermore, these issues are addressed in the River Basin Management Plan. They are also addressed in planning policy in the Kilkenny City and County Development Plan 2021-2027, which is the supporting spatial planning framework for the county.

3. Noted.

4. The statutory role of Kilkenny County Council is dealt with in the Kilkenny City and County Development Plan 2021-2027, which underpins this Plan. The objectives of the Water Framework Directive are a matter for the River Basin Management Plan.

5. The environmental effects of Plan implementation will be monitored through the defined Strategic Environmental Objectives (SEOs) in the SEA Environmental Report. SEOs relating to surface waters have been defined (SEO W1 and

	<p>7. The submission refers to the fact the water quality and aquatic life are integral elements of the UN Sustainable Development Goals Framework.</p> <p>8. The submission provides observations and examples on each of the ten Environmental Governance Principles in the Plan, as follows:</p> <p>(a) (EG1) Climate resilience in watercourses has multiple co-benefits. Restoration of and rehabilitation of watercourses can improve rivers ecological health. Restoration techniques are available in IFI’s publication Fish and Habitats: Science and Management (Volume 2) River Restoration Works (2020).</p> <p>(b) (EG2) Sustainable/regenerative farming contributes to soil health, biodiversity, water quality and climate mitigation. Restoration of wetlands & riparian vegetation provides co-benefits and protects water quality.</p> <p>(c)(EG3) Actions must be consistent with the maintenance/restoration of water bodies to at least Good Ecological Status, and where relevant, with achieving their Natura2000 conservation objectives.</p> <p>(d) (EG4) An integrated, catchment-based approach to flood mitigation and management is recommended; restoration of natural flood storage; consider the protection of vulnerable areas for recreational and amenity use rather than development.</p> <p>(e)(EG6) See EGI.</p> <p>(f) (EG7) See comments for EG1, EG2 and EG4.</p>	<p>W3). Targets and indicators have been defined for these SEOs. Targets and indicators for SEO W1 and W3 to be updated in the SEA Environmental Report.</p> <p>6. This is addressed in the Kilkenny City and County Development Plan 2021-2027, which underpins this Plan. Also note that the SEA Environmental Report has been constructed in such a manner that all Actions created by the Local Authority have been considered and any potentially significant environmental effects thereof have been mitigated against, including effects on receiving waterbodies.</p> <p>7. Noted.</p> <p>8. These are also matters for the River Basin Management Plan, and will be addressed through it as appropriate.</p> <p>8.(a) Noted.</p> <p>8.(b) Noted.</p> <p>8.(c) Noted and agreed. The Plan has been designed to support and be in harmony with water quality objectives.</p> <p>8.(d) Noted.</p> <p>8.(e) Noted.</p> <p>8.(f) Noted.</p> <p>8.(g) Noted. It is proposed that EG8 (in Section 1.8 of the Plan) will be modified as follows ‘Support opportunities to improve and restore ecological connectivity of non-</p>
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(g) (EG8) Barrier removal and mitigation supports watercourse connectivity and resilience.

(h) (EG9) The protection of riparian zones and instream hydro morphology provides protection against invasive species.

(i) (EG10) Peatland restoration improves biodiversity and builds climate resilience.

9. The submission provides observations and responses to specific Climate Actions as follows:

(a) Action 1.9: IFI advocates a landscape-scale, catchment management approach to flood protection and drainage.

(b) Action 2.11: IFI recommends that SuDS or similar passive treatment systems should be mandatory in road developments and that retrofitting SuDs should also be considered where possible. It further recommends that an audit of road drainage is required, accompanied by the implementation of measures to mitigate run-off.

(c) Action 2.17: comments on Action 2.11 above. Also, works on water crossings should comply with IFI's *Guidelines on Protection of Fisheries during Construction Works in and adjacent to Waters*. Where alterations to existing crossings are proposed, these should be upgraded to allow for fish passage where required.

(d) Action 3.1: Reference to IFI's publication *Fish and Habitats: Science and Management (Volume 2) River Restoration Works* (2020). Also, the use of cutover

designated habitats and sites (**including watercourse connectivity**) to improve overall ecosystem resilience and functioning while supporting climate action within the county.'

8.(h) Noted. It is proposed that EG9 (in Section 1.8 of the Plan) will be modified as follows: '*Ensure local authority projects supported by plan actions have taken the necessary precautions to identify and manage invasive species, particularly with regard to Schedule III species. No local authority climate action related development project that is likely to cause the spread of invasive species listed in Schedule III shall be supported. **All supported projects shall align with the goal of appropriately protecting, restoring and enhancing terrestrial and aquatic habitat and conditions to support the promotion of native species.***'

8.(i) Noted. It is proposed that EGP10 (in Section 1.8 of the Plan) will be modified as follows: "*Support opportunities to promote peatland restoration, rehabilitation and maintenance **inclusive of biodiversity enhancement**, while achieving climate targets through the implementation of the climate actions within the plan*".

9.(a) Noted. It is noted that flood relief actions defined in the Plan will be progressed under the Catchment and Flood Risk Assessment Programme (CFRAM), which takes a catchment-based approach to identifying and managing flood risk. See **Action 1.9: Deliver Flood Relief Schemes under the Catchment and Flood Risk Assessment Management (CFRAM) Programme, and Minor Flood Mitigation Works, incorporating nature based solutions, where possible, whilst**

peatlands for commercial afforestation with non-native should be avoided.

(e) Action 3.3: IFI welcomes this action. Developers on sites containing invasive species should be required to devise and implement invasive species management plans.

(f) Action 3.4: IFI would welcome the extension of programmes such as the All Ireland Pollinator Programme to riparian zones.

(g) Action 3.5: IFI advocates the complete elimination of the use of chemical pesticides and herbicides on bridges and in riparian zones.

(h) Action 3.6: IFI hope to establish pilot projects in the upper Barrow to investigate restoration projects. Such projects could provide a template for a national river restoration programme.

(i) Action 3.7: IFI supports the use of nature-based solutions in infrastructural, commercial and residential development, provides references, and encourages self-rehabilitation of a river system by ceasing activities such as channel maintenance, drainage, vegetation clearance or animal access.

(j) Action 3.8: Biodiversity enhancement should ensure that a development has a measurably positive impact ('net gain') on biodiversity. Enhancement metrics should be clearly established in advance e.g. length of riparian habitat restored, or water bodies restored to Good Ecological Status.

having appropriate regard to environmental protection requirements associated with flood resilience development.

Attention is drawn to the multiple mitigation measures produced during the SEA Environmental Report and NIR process for this LACAP that mitigate against potentially significant environmental effects on biodiversity, flora and fauna and the water environment.

9.(b) Noted. It is noted that Action 2.11 includes a mitigation measure that is intended to capture the potentially significant environmental effects of runoff micropollutants mentioned, amongst other effects, as follows: **Action 2.11** *"Integrate transport modes and enable a shift to sustainable modes through the effective management of parking demand and development of park and ride/stride and multi-modal hubs. Ensure such development promotes climate action co-benefits, including SuDS and nature-based solutions, and does not contravene relevant environmental protection criteria or cause significant negative environmental effects"*.

9.(c) This is addressed in Sections 7.6 and 10.2.7 of the Kilkenny City and County Development Plan 2021-2027, which underpins this Plan. Furthermore, it is noted that this action includes a mitigation measure that is intended to capture the potentially significant environmental effects of construction works on/near watercourses, as follows: **Action 3.1: Identify and implement actions to improve drainage on the Regional and local road network, and identify infrastructure at risk from climate events, having due regard to the need to promote nature based solutions and Sustainable Drainage Systems, and environmental**

	<p>Percentage biodiversity enhancement targets should be imposed for new developments.</p> <p>(k) Action 3.10: IFI welcomes this action. IFI requests that this includes a review of abstraction licences from surface and groundwaters to ensure attainment of Water Framework Directive Objectives. IFI requests a review of Section 4 discharge licences.</p> <p>(l) Action 3.11: As for Action 3.10 and EG3.</p> <p>(m) Action 4.12: Compliance with the Good Agricultural Practices is critical; risk mitigation measures such as riparian corridors should be encouraged; assess the application of fertilisers in the vicinity of Natura 2000 sites; Also comments from EG2 above.</p> <p>10. The submission requests consideration of the following suggested actions:</p> <p>(a) That any new developments, including proposed Climate Actions, are consistent with the maintenance/restoration of water bodies to at least Good Ecological Status, and where relevant, with achieving conservation objectives within designated areas.</p> <p>(b) A commitment to restore habitat connectivity in aquatic habitats to include longitudinal connectivity (barrier removal) and lateral connectivity (restoration of wetlands and floodplains).</p>	<p><i>sensitivities, including water quality, biodiversity and European sites.</i></p> <p>9.(d) Noted.</p> <p>9.(e) This is addressed in Section 9.2.10 of the Kilkenny City and County Development Plan 2021-2027, which underpins this Plan.</p> <p>9.(f) The extension of the Pollinator Programme is a matter for the All Ireland Pollinator Programme. Action 3.4 aims to <i>“Deliver a Pollinator Programme to protect and enhance pollinator habitats on Council owned land and in the wider county, whilst taking measures to promote the use of native plant species over non-natives, as appropriate”</i>.</p> <p>9.(g) Action 3.5 addresses herbicides on Council land as follows: <i>“Identify and utilise alternatives to herbicide use on Council land. Identify and utilise environmentally friendly alternatives to herbicide use on Council land.”</i> More extensive bans are a matter for the River Basin Management Plan.</p> <p>9.(h) Noted.</p> <p>9.(i) Noted, including references.</p> <p>9.(j) The Plan targets biodiversity enhancement. A variety of Biodiversity related Strategic Environmental Objectives which measure potential positive biodiversity effects of Plan implemented have been defined for the Plan. The Kilkenny City and County Development Plan 2021-2027 prescribes</p>
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(c) New water crossings or alterations to existing water-crossings, whether on public roads or in private developments, should be compatible with the upstream and downstream migration of native fish species, and adhere to IFI's *Guidelines on Protection of Fisheries during Construction Works*.

(d) The Local Authority should seek to identify missed connections in housing developments and restore connectivity to the mains sewerage network where necessary.

(e) Include a commitment to protect the spawning habitat of fish and prohibit the removal of gravel from rivers and streams.

(f) Enforce the Good Agricultural Practice (GAP) regulations, particularly in relation to water quality.

11. The Climate Action Plan is an essential step in addressing the Climate and Biodiversity Emergencies, and it can also contribute to the restoration of water bodies to Good Ecological Status as required by the WFD.

12. Recommends that due recognition be given to the value of watercourses as amenity areas.

13. Recommends that the local authority consider introducing river corridor management plans and provide a mechanism for the strategic integration of rivers and wetlands into development plans.

development management standards to promote biodiversity enhancement.

9.(k) Abstraction licences and Section 4 Discharge Licences are a matter for the River Basin Management Plan. A risk assessment and review of Section 4 Discharge Licences issued by Kilkenny County Council is currently being undertaken by the Environment Section of the Council, as part of the Recommended Minimum Criteria for Environmental Inspections (RMCEI) under the EPA's Local Authority Performance Framework.

9.(l) As for 9(k) and 9(c) above.

9.(m) This is a matter for the River Basin Management Plan.

10. Actions delivered through the Plan will be subject to all relevant national statutory polices and guidance. They are underpinned by the policies in the Kilkenny City and County Development Plan 2021-2027. In addition, many of these issues are a matter for the River Basin Management Plan.

The Plan has been shaped by SEA and AA processes to ensure all actions will be undertaken in accordance with water quality and conservation objectives, and having due regard to water quality, hydrological and biodiversity related sensitivities. A strong plan-level commitment to restoring habitat connectivity has been made in the Plan. The implementation of the Plan will promote water quality and biodiversity co-benefits insofar as the Council's remit extends.

11. Noted.

12. This issue is already addressed in the Kilkenny City & County Development Plan 2021-2027.

13. This is a matter for the River Basin Management Plan.

General comment

It is acknowledged that the impacts of climate change can cause/exacerbate impacts on aquatic habitats and species. However, there is an existing strong framework of legislation, policy and guidance in place for water protection and restoration of water quality, including the Water Framework Directive, River Basin Management Plans, and also the City and County Development Plan. These are the appropriate vehicles for addressing many of the issues raised, and the responses to this submission refer to these where appropriate. The scope of the Plan relates to delivering actions in line with its Mission Statement, and underpinned by the Kilkenny City and County Development Plan 2021-2027, as the supporting spatial planning framework for the county.

All relevant submissions were issued to Fehily Timoney for review and consideration. Please refer to the SEA Environmental report that accompanies the Draft Plan and the Strategic Environmental Assessment Screening report of modifications proposed. It is concluded that the proposed modifications to the Draft Plan will not result in the occurrence of any additional environmental impacts not previously considered or mitigated against in the Draft Plan.

CE Recommendation:

		Minor modifications to the wording of three of the ten Environmental Governance Principles (EGP's) (Section 1.8), which underpin and frame the actions in the Plan - namely EGP8, EGP9, EGP10.
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Submission Number.	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-25	Uisce Eireann	<p>1. The submission refers to sustainability plans that Uisce Eireann are producing, and outlines some of the consequences of climate change on water resources and infrastructure thus requiring more investment to ensure climate resilient water services, and adoption of blue-green infrastructure.</p> <p>2. To maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted by UE. The removal of stormwater from combined sewers using Sustainable Urban Drainage Systems and Green-Blue Infrastructure in new developments, and retrofitted in existing developed areas, is strongly encouraged. It welcomes the Council's commitment to <i>"Identify and implement actions to improve drainage on the Regional and local road network, and identify infrastructure at risk from climate event, having due regard to the need to promote nature based solutions and Sustainable Drainage Systems, and environmental sensitivities,</i></p>	<p>Response:</p> <p>Kilkenny County Council welcomes the submission from Uisce Eireann.</p> <ol style="list-style-type: none"> 1. Noted 2. Noted 3. Noted 4. Noted 5. This is addressed through the Kilkenny City and County Development Plan 2021-2027, which is the spatial planning framework for the county and which underpins this Plan. 6. Noted and welcomed. <p>This supports Action 2.26 in the Plan "Investigate the feasibility of local authority led/supported alternative heating systems and fuels including District Heating and Geothermal"</p>

	<p><i>including water Quality, biodiversity and European sites”.</i></p> <p>3. Suggests that the following guidance be considered in relation to nature-based solutions and sustainable urban drainage:</p> <p>(i) Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document</p> <p>(ii) National (Infrastructure) Guidelines and Standards Group recent NGS Circular 1 of 2023,</p> <p>(iii) DMURS Advice Note 5 Road and Street Drainage using Nature Based Solutions Design</p> <p>(iv) Greening and Nature-based SuDS for Active Travel Schemes - National Transport</p> <p>(v) Guidance for Urban watercourses by Inland Fisheries Ireland.</p> <p>4. Refers to the proposed Urban Wastewater Treatment Directive (URWTD) which if adopted will require collaboration between Uisce Eireann and the Local Authority on integrated drainage planning.</p> <p>5. The submission refers to the National Water Resource Plan (NWRP), and the work that Uisce Eireann is undertaking to assess the risks from climate change on water infrastructure and demand. It recommends that water efficiency be included as an objective/action in</p>	<p>7. Noted and welcomed.</p> <p>8. The potential effects on material assets of actions from the Plan have already been considered and mitigated against under the SEA process. Environmental Governance Principle 3, for example, provides for the protection of the environment, including the material asset environment, during the planning and carrying out of all development supported by defined climate action.</p> <p>These issues will also be dealt with through the Planning process as appropriate, as supported by the Kilkenny City and County Development Plan 2021-2027.</p> <p>The Kilkenny City and County Development Plan 2021-2027, which underpins this Plan, address the protection of water sources and water infrastructure (Section 10).</p> <p>CE Recommendation:</p> <p>No Change to the Draft Plan.</p>
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		<p>the Plan to help reduce emissions and protect natural resources.</p> <p>6. Uisce Eireann would welcome the opportunity to explore potential collaboration in relation to district heating where heat recovery from the wastewater network and wastewater treatment plants could be a source of heat. 7. The submission refers to circularity and bio-economy initiatives that Uisce Eireann is undertaking in relation to sludge management, e.g. Anaerobic Digestion, and is keen to collaborate with others re same.</p> <p>8. Uisce Eireann requests that any new developments associated with the Plan have due regard for, and not adversely impact existing, planned or reasonably foreseeable water sources or Uisce Eireann infrastructure.</p>	
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Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-26	Local Authorities Water Programme (LAWPRO)	<p>1. The submission recommends that a protocol that sets a standard for climate proofing, to include “water sensitive urban design” be developed for local authority led capital plans, purchases and investment.</p> <p>2. The submission recommends that a tree cover survey be carried out, and policy developed, for lands owned by the local authority to identify sites for native tree planting. Also, that tree pits to be integrated into surface water drainage where possible.</p>	<p>Response: Kilkenny County Council welcomes the submission from LAWPRO.</p> <p>1. This is addressed in Action 3.7 of the Plan as follows: <i>“Implement Nature-based Solutions and biodiversity enhancement in new Kilkenny County Council developments”</i>. This action includes a KPI to develop guidance.</p> <p>2. This is addressed in the following three actions in the Plan: Action 3.1: <i>“Prepare a Tree Strategy and Policy for Kilkenny City to provide a long-term vision for the management of public</i></p>

3. Recommends a programme of measures for Council buildings and facilities to reduce emissions by 51% by 2030, including rainwater collection/water conservation and nature-based solutions.

4. Recommends to develop and implement a nature-based solutions (NBS) and integrated rainwater management protocol for both Council and private sector projects, and prioritise NBS over conventional systems in line with national guidance parameters.

5. Carry out a review of Section 4 Discharge to Water Licences to determine if they are fit for purpose to meet projected climate change related risks such as hydrological changes and water temperature increases.

6. Prepare a guidance document and deliver training on the importance of quality rating and sustainable management of hedgerows and riparian areas, for Council staff and external stakeholders including farmers/landowners.

7. Support existing citizen science initiatives including those focusing on water quality through the National Biodiversity Data Centre's biodiversity recording portal through training of stakeholders and publicising schemes and resources.

8. Building on the County Kilkenny Wetland Field Survey, develop a Wetland Restoration Plan, to identify priority areas for habitat restoration, carbon capture, water and biodiversity benefits, along with phased restoration.

trees 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”.

Action 3.2: *Promote and facilitate tree, woodland and hedgerow protection, planting and management on public and private land 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.*

Action 3.6: *Identify, map and utilise local authority owned land for habitat enhancement/restoration and nature-based solutions, whilst taking measures to promote the use of native plant/animal species over non-natives, as appropriate.*

3. This is addressed in the following two actions in the Plan:

Action 2.25: *Undertake a programme of energy reduction, retrofitting, and onsite renewable measures on Local Authority buildings, facilities and social housing, having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity, and the need to appropriately protect and conserve protected structures.*

Action 3.7: *Implement Nature-based Solutions and biodiversity enhancement in new Kilkenny County Council developments.*

4. This is addressed in the following four actions in the Plan:

Action 2.17: *Identify and implement actions to improve drainage on the Regional and local road network, and identify infrastructure at risk from climate events, having due regard to the need to promote nature-based solutions and Sustainable*

9. Identify ways to provide training, information and supports for community groups / community event organisers to deliver climate action measures, for example, those relating to: water conservation/ rainwater harvesting, nature-based solutions.

10. Identify ways to support grant administrators in their role as influencers of climate action /sustainability and protecting water resources through administration of grants across Council services’.

11. Encourage a community response to enable biodiversity and water conservation in the community, in association with groups such as the Tidy Towns, through innovative measures, events and training.

12. Recommend the identification of a sub-catchment where water quality objectives are not being met, and where there is an established flood risk and undertake a study on same.

13. LAWPRO looks forward to working with all stakeholders over the course of the plan and assisting where possible in the delivery of climate action and water quality improvements in County Kilkenny.

Drainage Systems, and environmental sensitivities, including water quality, biodiversity and European sites.

Action 3.6: *Identify, map and utilise local authority owned land for habitat enhancement/restoration and nature-based solutions, whilst taking measures to promote the use of native plant/animal species over non-natives, as appropriate.*

Action 3.7: *Implement Nature-based Solutions and biodiversity enhancement in new Kilkenny County Council developments.*

Action 3.8: *Implement Nature-based Solutions and biodiversity enhancement through the planning process*

5. This is a matter for the River Basin Management Plan, under the Water Framework Directive. A risk assessment and review of Section 4 Discharge Licences issued by Kilkenny County Council is currently being undertaken by the Environment Section of the Council, under the Recommended Minimum Criteria for Environmental Inspections (RMCEI) under the EPA’s Local Authority Performance Framework.

6. This action will be addressed in the Kilkenny County Council Biodiversity Action Plan, to be prepared in 2024.

7. This is addressed in three actions in the Plan as follows:

Action 4.1: *Deliver the Community Climate Action Fund. Ensure projects supported by this action are delivered in a manner that has due regard to: All relevant environmental sensitivities (e.g., heritage, biodiversity, European site related sensitivities), and Opportunities to promote climate action co-benefits, where possible (e.g., through the use of nature-based solutions or sustainable drainage systems).*

Action 4.2: *Support communities to deliver local climate and sustainability actions, through programmes such as Sustainable*

Energy Communities, Tidy Towns, GAA Green Clubs, Green Schools and Heritage in Schools, Heritage Week, National Biodiversity Week, Creative Ireland and Cruinnui na nOg.

Action 4.8: *Deliver an educational and awareness programme, through the Library Service, on climate action, sustainability, biodiversity and the circular economy, by providing workshops, information clinics, citizen science kits, home energy kits, books, digital resources, educational programmes, and events for festivals/themes (e.g. Science Week, Sustainable Development Goals Week etc).*

8. Kilkenny County Council has completed a county wide audit of wetland sites. The recommendations of this audit will be addressed in the Kilkenny County Council Biodiversity Action Plan, to be prepared by the Biodiversity Office in 2024.

9. This is addressed in Actions 4.2 and 4.8 of the Plan. See item 8 above.

10. This is addressed in the following two actions in the Plan:

Action 1.2: *Provide climate action training, capacity building and knowledge sharing to Council staff and Elected Representatives.*

Action 1.7: *Climate proof Kilkenny County Council grants programmes.*

11. This is addressed in Actions 4.1, 4.2, and 4.8 of the Plan. See item 7 above.

12. This will be addressed and delivered in partnership with LAWPRO, in Action 3.10 in the Plan as follows:

Action 3.10: *Assess feasibility of identifying waterbodies that are both particularly vulnerable to extreme climate events, and*

			<p><i>at risk of not meeting the requirements of the EU Water Framework Directive.</i></p> <p>13. Noted and welcomed.</p> <p>CE Recommendation: No Change to the Draft Plan.</p>
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Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-28	Failte Ireland	<p>1. The submission welcomes the Plan, the opportunity to assist and build on the long-established relationship with Kilkenny County Council, and to ensure the enhancement of tourism in the county, in the context of Sustainable Development Goal No. 13, Climate Action. It recognises the complex range of issues addressed in the Plan.</p> <p>2. It provides a summary of Failte Ireland’s role, its approach to sustainable tourism, and to addressing the national public sector greenhouse gas emissions targets. It states that “Driving Climate Action” is a key Strategic Priority for Failte Ireland, and encourages tourism businesses in the county to engage with supports under this programme.</p> <p>3. It mentions that Failte Ireland was appointed as a Sustainable Development Goal (SDG) Champion by the Department of Environment, Climate and Communications and is working internally and externally to bring awareness of the SDG’s in their activities. They welcome the opportunity to continue consulting with the Tourism and Enterprise sections of Kilkenny County Council.</p>	<p>Response: Kilkenny County Council welcomes the submission from Failte Ireland.</p> <ol style="list-style-type: none"> Noted. Noted. Noted. Noted and welcomed. <p>CE Recommendation: No Change to the Draft Plan.</p>

	4. Commends Kilkenny County Council on the Plan and is committed to working with the Council on achieving the Plan objectives.	
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Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-24	Health Service Executive (HSE)	<p>1. The submission prepared by the National Office of Environmental Health Services section of the HSE is in support of Kilkenny County Councils delivery of a Climate Action Plan for the county of Kilkenny that protects and promotes population health.</p> <p>2. The submission recommends that the Plan is inclusive for all and leaves no one behind, and that it is age-friendly, and delivers for genders, ages, and disadvantaged and marginalised groups.</p> <p>3. The submission suggests that the Plan's Vision is re-worded to address health and well-being.</p>	<p>Response: Kilkenny County Council welcomes the submission from the Health Service Executive.</p> <p>1. Noted. For clarity, the scope of the Plan (as prescribed by the Local Authority Climate Action Plan Guidelines, DECC, 2023) is on actions that the Council will take across its own governance, services and operations to reduce energy use and carbon emissions, and adapt to the changing climate. (Section 1.4 "Scope of the Plan").</p> <p>2. Noted. The Plan is underpinned by the Kilkenny City and County Development Plan 2021-2027, and the Kilkenny County Council Local Economic and Community Plan 2023-2028, and their Objectives and policies in relation to social inclusion. <u>It is proposed to insert a new sub-section in Section 2 of the Plan to clarify the roles of the County Development Plan and the Local Economic and Community Plan, in relation to and underpinning the Climate Action Plan.</u></p> <p>In addition, a Just Transition approach to climate action underpins the Plan. Objective 4.1 of the Plan addresses this as follows: <i>"Support and empower communities to adapt to the impacts of climate change and facilitate local climate action through education and awareness initiatives, well-being, cultural and creative programmes and grants"</i>.</p>

4. The submission suggests that climate literacy is addressed in the Plan.

5. The submission suggests that the Council works in partnership with the HSE and service providers within the HSE who have a health protection function.

3. It is considered that the Vision statement is most appropriate to the scope and aims of the Plan (see item 1 above). It is also closely aligned with the wording of the National Climate Objective. The vision reads: *“A climate resilient organisation that inspires and supports the County’s transition to a climate resilient, biodiversity rich, sustainable and carbon neutral economy by 2050”*.

4. Climate literacy is already addressed in the Plan in the following two actions:

Action 4.6: *“Design and deliver an arts programme which supports young people, communities and artists to creatively and positively respond to climate change”*

Action 4.8: *“Deliver an educational and awareness programme, through the Library Service, on climate action, sustainability, biodiversity and the circular economy, by providing workshops, information clinics, citizen science kits, home energy kits, books, digital resources, educational programmes, and events for festivals/themes (e.g. Science Week, Sustainable Development Goals Week etc)”*

5. Kilkenny County Council welcomes the opportunity to work in partnership with the HSE and service providers on delivery of the actions in the Plan. This may be achieved through existing partnerships such as the Local Community Development Committee (LCDC), Healthy Ireland Programme etc, or through new arrangements as appropriate. The following actions in the Plan refer to working in partnership:

Action 1.8: Collaborate with national, regional and local stakeholders and partners on climate action delivery.

Action 4.4: Support climate awareness and resilience through the Healthy Ireland Programme.

6. The submission suggests that Health Impact Assessments are included as part of the evidence base, and for measuring progress and impacts.

7. It suggests the development of partnerships with health-oriented organisations, and queries how stakeholders such as the HSE were consulted as part of the Plan development process.

8. The submission recommends an expanded Climate Change Risk Assessment to address issues other than severe weather e.g. air quality and alien invasive species.

It is proposed to amend the wording of Action 4.4 as follows: “Support climate awareness and resilience through the Healthy Ireland Programmes, **and other relevant health programmes**”, and to add the **HSE as a Partner** in the delivery of the action.

6. The scope and methodology of the Evidence Base undertaken to inform the Plan was in accordance with that prescribed by the “Local Authority Climate Action Plan Guidelines” (2023), developed by the Department of Climate, Environment and Communications. Health and well-being were addressed in the Climate Risk Assessment (see item 8 below). The evidence base is considered appropriate and robust.

7. See item 7 above re partnerships. Regarding consultation with stakeholders, the public and all interested stakeholders were invited to take part in the Pre-Draft Consultation Stage of the Plan held from April to June 2023 and widely promoted. Section 1.6 (Step 4) of the Plan outlines further details.

8. “Health and wellbeing” was one of seven categories of risk addressed in the Climate Risk Assessment. The Climate Change Risk Assessment undertaken for the Plan is considered to be robust and appropriate. It’s scope and methodology were prescribed by the Local Authority Climate Action Plan Guidelines (2023) produced by Department of Climate, Environment and Communications. A copy of the full Climate Change Risk Assessment is published with the Draft Climate Action Plan [here](#).

In relation to air quality, the Plan recognises the importance of air quality for public health, and its links to climate change. This is addressed in the following action in the Plan:

9. The submission notes that great detail is provided in the table of Actions, but recommends a more extensive list of SMART Objectives, along with a Monitoring and Evaluation Framework, and a Health Impact Assessment.

10. The submission recommends a “comply or explain” approach to reporting on the Plan.

11. The submission states that a reference to Emergency Management could not be found in the Plan.

5.11: Monitor and report on air quality.

In relation to invasive species, the Plan recognises the potential for increased spread of invasive and non-native biological species due to climate change. It includes actions in relation to its’ land and staff, as follows: **Action 3.3: Develop an Invasive Species Register and Treatment Strategy for Council land. This programme shall be developed by a competent ecology team, and shall have due regard to the need to appropriately manage and prevent the spread of invasive species.**

Action 1.13: Review the Council's Health & Safety Policies and Procedures to take account of the impact of climate change on the welfare of staff.

9. The Monitoring and Evaluation Framework used in the Plan is considered robust and appropriate. It is in accordance with that prescribed by the “Local Authority Climate Action Plan Guidelines” (2023) developed by the Department of Climate, Environment and Communications. Health and well-being were addressed in the Climate Risk Assessment (see item 8 above).

10. A robust reporting and monitoring framework as prescribed by the Department of Climate, Environment and Communications, and CARO will be implemented. Details of a full suite of existing mechanisms for monitoring and reporting are provided in Section 7.3 of the Plan. In addition, the Plan includes a number of actions which address this as follows: **Action 1.5: Internal Audit monitoring of the management, reporting and delivery of statutory targets related to climate change /climate action within all relevant Service Areas in the Council.**

Action 1.6: Monitor, Report and Communicate on delivery of Kilkenny County Council climate actions and targets.

12. The submission recommends that Kilkenny County Council adopt Disaster Risk Reduction/Disaster Risk Management approach utilising the Sendai Framework 2015 – 2030, and that it includes all parts of the Emergency Management Framework including Early Warning Systems.

13. The plan to decarbonise Kilkenny City is welcomed. It recommends that the DZ should address issues including health, climate literacy, climate change risk assessment, monitoring and evaluation, avoiding maladaptation.

14. The submission provides a general comment on Climate Change, Health and the Sustainable Development Goals including the following:

- (a) Climate change is the greatest threat to global health this century and climate action is greatest opportunity for delivering health gain.
- (b) The Plan should support the National Climate Objective and National Climate Action Plan
- (c) The Plan should include actions on citizen engagement, just transition, zero emission building standard, retrofitting, healthier housing, workplaces and communities, a shift-avoid-improve transport approach, renewable energy and climate resilience.

11. Emergency Management is comprehensively addressed in the Plan. It was a key component of the Climate Change Risk Assessment and is also addressed in the following actions in the Plan:

Action 1.10: Develop and implement an enhanced Flood Forecasting and Monitoring System.

Action 1.11: Annual review of Kilkenny County Council's Emergency Response Protocol for severe weather events, and Kilkenny County Councils Risk Register.

12. The Sendai Framework for Disaster Risk Reduction 2015 – 2030 is addressed at a national level in the National Adaptation Framework, which underpins local government adaptation planning and this Plan.

The Plan recognises the importance of emergency management, emergency responses and flood forecasting as key tools in disaster risk reduction and includes the following actions in relation to these: **Action 1.10:** *Develop and implement an enhanced Flood Forecasting and Monitoring System.*

Action 1.11: *Annual review of Kilkenny County Council's Emergency Response Protocol for severe weather events, and Kilkenny County Council's Risk Register.*

Action 1.12: *Review and update flood baseline data to inform Flood Relief Project Design.*

13. Noted. See responses to all items above.

14. (a) Noted.

		<p>15. The Plan should address the United Nations Sustainable Development Goals (SDG's) in particular SDG 13 ("to ensure healthy lives and promote well-being for all at all ages").</p>	<p>(b) The Plan supports the National Climate Objective and National Climate Action Plan. See Sections 5.1 and 1.2 of the Plan.</p> <p>(c) The Plan addresses all of these issues in so far as it's remit and functions provides. See all items above, and Section 5.5 of the Plan (Climate Actions).</p> <p>15. Agree. The Plan supports the SDG's and for clarity these will be added to the table of Climate actions (Section 5.5) in the Plan.</p> <p><u>It is proposed to incorporate a modification to the Table of Actions (Section 5.6) to include a new column identifying the relevant Sustainable Development Goals (SDG's) addressed by each action.</u></p> <p>CE Recommendation: Two minor amendments to the Plan. See Items 5 and 16 above.</p>
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Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
Comment, not formal submission	Department of Transport (DoT)	<p>1. The submission states that local authorities have significant potential to directly support national climate action in the transport sector by taking both an inward (organisational) and an outward (community) focus.</p> <p>2. It highlights ways in which the Plan can support climate action by decarbonising local authority fleet, support development of EV charging infrastructure, delivery of active travel networks, integration of alternatives to the private car and active travel, support and advocating for behaviour change.</p>	<p>Response: Kilkenny County Council welcomes the submission from the Department of Transport. (Note: All actions relating to the issues raised have been detailed at the end of this response to avoid repetition).</p> <p>1. Noted.</p> <p>2. Noted. All of these issues are addressed in the Plan. See actions listed under Strategic Goal 3: Built and Transport in the Climate Actions Table (Section 5.6), specifically Actions 2.1-2.11 at the end of this response.</p>

3. The submission references the National Climate Action Plan 2023 (CAP23), supporting/informing reports and KPI's/targets from same. It recommends that local authorities identify additional measures to deliver action including road space reallocation, pedestrian and cycling enhancement plans, and demand management measures. It recommends that key policies, CAP23 metrics and relevant support provided centrally to support actions should be included in the Plan.

4. The Plan should address "Public Engagement and Project Acceptance Communications" to include awareness and understanding of the Avoid-Shift-Improve approach, and the benefits modal shift towards sustainable mobility.

5. Recommends that the local authority engages with and learns from the Smart and Sustainable Mobility Workshops / SMP "Accelerator" Workshop programme.

6. Consider measures to reduce the number and length of journeys taken in their areas (Demand Management), review parking policy, support the Clean Air Strategy by reducing emissions, and align the Plan with the national Sustainable Mobility Policy (SMP).

7. It references the National Cycle Network Plan and the CycleConnects Plans which local authorities will support delivery of.

8. It references road space reallocation and states that Design Manual for Urban Roads and Streets (DMURS) is the principal design standard for all Urban Roads and is to be used in all cases except where a formal derogation has been granted by an oversight body such as TII, NTA or

3. The Plan has considered the policy documents as outlined, and will seek through the delivery of actions set out in this Plan, and through the service delivery of the Roads and Transport Section of the Council, that the actions, plans and programmes are cognisant and aligned with them in terms of overall targets/KPI's.

The measures proposed are addressed in **Actions 2.1-2.11**.

4. Public engagement and communications is key to the success of the Avoid-Shift-Improve approach, and is specifically addressed in **Action 2.14** of the Plan.

5. Noted. This will be addressed in the Kilkenny City Sustainable Urban Mobility Plan (SUMP) and Mobility Management Plans for other towns in the county. See **Action 2.5**.

6. Parking demand and policy is addressed in **Action 2.11**. Reducing emissions from transport is a core priority of the Plan and is addressed in multiple actions in the Plan e.g. **Actions 2.2, 2.4, 2.15, 2.16, 5.11** (Monitor and report on air quality).

7. Noted. **Action 2.12** supports the development of cycle networks in Kilkenny City and larger urban areas.

8. Noted. The Council will seek through the delivery of actions set out in this Plan and through the service delivery of the Roads and Transport Section of the Council, that the actions, plans and programmes are cognisant and aligned with all relevant national guidelines and tools.

Road space reallocation towards the sustainable movement of people, and placemaking is addressed in **Action 2.7** of the Plan.

	<p>DoT. Guidelines are in development re rural roads, and the tools in the TII Standards are to be considered. It notes the legal requirement that all road related infrastructure should be fully accessible to all users.</p> <p>9. It recommends that the importance and role of integrated land use and transport planning in meeting our climate commitments should be addressed in the Plan. The preparation of local transport plans should set mode share targets in order to support a significant shift to active and sustainable modes and the reduction in private car trips in the short to medium-term.</p> <p>10. It requests that local authorities in metropolitan areas including Waterford/Kilkenny engage with the Transport Orientated Development working group to identify potential TOD opportunities in urban centres, and to reflect these in the Plan.</p> <p>11. It recommends that local authorities consider and implement Transport infrastructure adaptation, as addressed in the Transport Sectoral Adaptation Plan (2019). This includes alignment with national Climate Action Plan adaptation actions and Sectoral Adaptation Plans, identification of climate risks to transport infrastructure, adaptation of critical transport infrastructure, wider environmental co-benefits, ensuring that climate mitigation actions do not give rise to maladaptation. It references strategies which the local authority should take account of in relation to investment, spatial planning and assessment for roads.</p>	<p>9. Noted. The integration of land use and transport planning is vital and is addressed in Actions 2.6 and 2.11. Specific targets have been identified for all transport related actions in this Plan.</p> <p>10. Noted and agreed. This will be addressed through the Kilkenny City Sustainable Urban Mobility Plan (SUMP). See Action 2.5.</p> <p>11. Noted. The Council will seek through the delivery of actions set out in this Plan and through the service delivery of the Roads and Transport Section of the Council, that the actions, plans and programmes are cognisant and aligned with all relevant national Sectoral Adaptation Plans.</p> <p>12. Kilkenny County Council is, in partnership with neighbouring local authorities, developing a Regional EV Infrastructure Strategy, in accordance with ZEV guidance. Action 2.3 refers.</p> <p>13. Noted and agreed.</p> <p>General Comments: The Council recognises the importance of the policies detailed above in supporting the achievement of Irelands transport emissions, and the role of the local authority in the delivery and implementation of same. The Plan includes a large number of actions which address the submission from the DoT. These should be considered in conjunction with the provisions of the County Development Plan, Local Area Plans, Local Transport Study, Mobility Plans, the Kilkenny City Sustainable Urban Mobility Plan, and the Active Travel and Towns First Programmes.</p>
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12. In relation to the development of EV Infrastructure Strategies the submission lists the strategies to be considered, and requests that the Plan reflects national EV policy and targets.

13. Local Authorities are requested to recognise the importance of the policies detailed above in supporting the achievement of Ireland's transport emissions targets, as well as the key role of Local Authorities in the delivery and implementation of those policies.

Actions in the Draft Plan Relating to Above:

Action 2.1: Smarter Travel Programme.

Action 2.2: Local Authority business, travel and working arrangements.

Action 2.3: Regional EV Infrastructure Strategy.

Action 2.4: Fleet Decarbonisation Strategy.

Action 2.5: Kilkenny City SUMP and Mobility Management Plans.

Action 2.6: Integrate transport and land-use planning.

Action 2.7: Sustainable movement of people and placemaking.

Action 2.8: Independent journeys for all.

Action 2.9: Enhance Permeability for active travel.

Action 2.10: Public transport and connectivity.

Action 2.11: Integrate transport modes.

Action 2.12: Cycle network.

Action 2.13: Safe routes to school programme.

Action 2.14: Communication, awareness, participation.

Action 2.15: Park & Ride.

			<p>Action 2.16: Low carbon & low waste road construction.</p> <p>Action 2.17: Improve drainage and identify risks.</p> <p>Action 2.18: Reduce energy in lighting pedestrian crossings.</p> <p>CE Recommendation: No Change to the Draft Plan.</p>
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Submission Number	Submission Name	Comment Summary	CE Response and Recommendation
n/a Comment, not formal submission	Climate Action Regional Office (CARO) Eastern and Midlands	<p>1. Use an updated version of Figure 2.1, which mentions City and County Development Plans, to be provided by CARO</p> <p>2. Recommends providing more information on the current impacts of Climate Change in Section 4.2 (Climate Change Risk Assessment).</p> <p>3. Recommends that the Strategic Themes in Section 5 of the Plan should be Strategic Goals.</p> <p>4. Noted a difference between the number of actions stated in Section 5.4 of the Plan and the number of actions in Table 5.5. Also, recommended that the actions relating to the Decarbonising Zone (DZ) should be kept separate from the other actions for the Climate Action Plan.</p> <p>5. Recommends that additional reference to the United Nations Sustainable Development Goals (SDG's) be added to the report to better illustrate alignment between the actions in the Plan and the SDG's.</p>	<p>Kilkenny County Council welcomes the comments from CARO. It is noted that they are comments and not a formal submission.</p> <p>1. Agreed. It is proposed that Figure 2.1 will be replaced with an updated version provided by CARO.</p> <p>2. Agreed. It is proposed that additional graphics illustrating current climate hazards in Co. Kilkenny will be included in Section 4.2 of the Plan for the purposes of clarity.</p> <p>3. Agreed. It is proposed that the Strategic Themes, will be re-named Strategic Goals, and an explanation provided for each, to align with the Local Authority Climate Action Plan Guidelines.</p> <p>4. Agreed. Section 5.4 of the Plan states that there are 96 actions in the Plan, plus four actions specific to the DZ. However, Table 5.5 lists 89 actions, plus 4 DZ actions. There are a few modifications proposed to explain and correct these discrepancies as follows:</p> <p>(i) The correct total number of actions in the Plan is 95, not 96. It is proposed to amend this error in the text in Section 5.4 as follows: "A total of 96 <u>95</u> actions were identified in the Plan</p>

(plus an additional four actions specific to the Kilkenny City DZ).”

(ii) Six actions (Action No.’s 1.14 to 1.19 in Strategic Theme 1 Governance and Leadership) were inadvertently omitted from the Draft Plan produced for public consultation was uploaded to the consult.kilkenny portal. This happened when the excel sheets were merged with the text and saved as a pdf. The missing actions relate to the final 6 lines on the first excel worksheet.

It is proposed to include the actions (1.14-1.19) which were inadvertently omitted from the Draft Plan produced for public consultation, as modifications in the Chief Executive’s Report on Submissions. They will be presented in the same format as the Table of Action 5.5 in the Plan.

N.B: All 99 actions were sent to the Environmental Consultants and the Statutory Environmental Consultants, as required under the SEA Regulations (SEA Directive 20002/42/EC) and EU Habitats Directive (Directive 92/43/EEC) and have been reviewed for SEA and AA in accordance with these statutory requirements.

The six actions which were omitted from the Draft Plan are actions which are being/will be delivered through existing work programmes and plans irrespective of the Climate Action Plan. The Climate Action Plan re-enforces them. This, coupled with the fact that they have been reviewed for SEA and AA in accordance with statutory requirements, means that their addition to this Report is considered a modification and is not material.

		<p>(iii) It is proposed that the actions which relate specifically to the DZ will be omitted from Section 5.5. They will remain in Section 6.6 as they are.</p> <p>5. Agreed. It is proposed that a modification will be made to the List of Actions 5.5 to include a new column identifying the relevant United Nations Sustainable Development Goals (SDG's) addressed by each action.</p> <p>It is further proposed that the SDG's will be referenced in Section 5.3 of the Plan to clarify how the SDG's relate to the Strategic Goals in the Plan.</p> <p>CE Recommendation</p> <p>It is proposed that modifications be made to the Plan as outlined in responses 1-5 above.</p>
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Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-30	The Department of Agriculture, Environment and Rural Affairs (DAERA) - Northern Ireland Environment Agency (NIEA)	<p>1. The submission is in relation to the SEA Environmental Report of the Plan. It is broadly content with the findings of the Report but requests an assessment of transboundary issues in relation to Northern Ireland whilst noting that transboundary impacts are unlikely due to the distance.</p> <p>2.The NIEA Natural Environment Division (NED) also requests that the transboundary impacts on Northern Ireland are assessed.</p>	<p>Kilkenny County Council welcomes the submission from The Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency.</p> <p>1. All effects of the Plan have been evaluated, including transboundary effects. Mitigation measures have been adopted to ensure that the environmental effects of Plan Action are controlled at the source. The SEA ER will be updated to include a clear statement on transboundary effects, explaining how they are considered and mitigated.</p> <p>2. Noted. See item 1 above.</p>

	<p>3. NED requests including of a number of reports, strategies, policies and regulations relating to natural heritage in Northern Ireland.</p> <p>4.The submission requests the inclusion of reports relating to Northern Irish data sources, indicators and targets to ensure that the environment within Northern Ireland is protected.</p> <p>5. The Air Quality Biodiversity Unit acknowledges the objectives of the Plan to reduce air pollution in County Kilkenny. It suggests that consideration be given to the potential impact of the Plan on air pollutants such as agricultural ammonia, nitrogen oxides and resulting nitrogen deposition at both sites in the Republic of Ireland and NI (transboundary impacts), and also the co-benefits of restoring peatlands which can support the habitat to deal with air pollution. It notes the Air Pollution Information System (APIS) which provides impacts of air pollutants on sensitive habitats and species.</p>	<p>3. Noted. See item 1 above.</p> <p>4.The distance and lack of environmental pathways between Co. Kilkenny and Northern Ireland is noted. Northern Irish reports, strategies, policies and regulations will be consulted and included in the Environmental Report and in the Environmental Report and Natura Impact Report.</p> <p>5. Noted. The SEA found the Plan does not support any development or activities that may generate air/gaseous agricultural ammonia or nitrogen oxides.</p> <p>Recommendation:</p> <p>No Change to the Draft Plan.</p> <p>The SEA ER and NIR will be modified on the basis of the submission for the reasons set out in item 1 above.</p>
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Submissions from Voluntary, Representative and Development Organisations

Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-33	(IrBEA)	1. The submission outlines the role of IrBEA as a representative body for the bioenergy sector covering solid biomass, biogas/biomethane, biofuels, biochar, wood fuels and energy crops, and states that the bioenergy sector can play an important role in local	<p>Response:</p> <p>Kilkenny County Council welcomes the submission from the Irish Bioenergy Association.</p> <p>1. Noted.</p>

	<p>Climate Action Plans, in the bioeconomy and in decarbonising heating and transport.</p> <p>2. The submission welcomes the inclusion of biomethane in the Plan as part of climate action on farms, and states that there is potential for the development of additional biogas/ biomethane plants across Kilkenny which could assist in farm diversification and in capturing and utilising methane produced from agriculture. IrBEA could assist in the delivery of same. It states that there is a need to address issues within the planning system including to distinguish between small and large-scale industrial systems.</p> <p>3. The submission recommends that use of wood chip, pellet and logs should be encouraged and that opportunities under the SEAI administered Support Scheme for Renewable Heat (SSRH) should be mentioned in the Plan.</p> <p>4. The submission outlines the benefits of biochar in carbon capture and storage, heating and carbon offsetting, and recommends that future iterations of the Plan reflect this.</p> <p>5. It welcomes the inclusion of staff training in the Plan and suggests that IrBEA could assist with this. They would welcome the opportunity to assist in the development of any climate action where bioenergy can play a role.</p>	<p>2. Noted. Action 4.12 in the Plan aims to support climate action on farms, as follows: Action 4.12: Support climate action on farms through local authority policy and programmes. The action references the National Biomethane as a key dependency.</p> <p>A review of national planning policy is a matter for the Government. The Kilkenny City and County Development Plan 2021-2027 contains policies in relation to Bioenergy (Section 11.7). In addition, it is an aim of this Plan to review Kilkenny County Council planning policy to ensure that policies support best practice in Climate Action as follows: Action 1.14: Peer review planning policies regarding climate action.</p> <p>3. It is proposed that Action 2.26 will be amended to include reference to bioenergy, as follows: “Investigate the feasibility of local authority led/supported alternative heating systems and fuels including District Heating, and Geothermal, <u>and bioenergy</u>”.</p> <p>4. Noted.</p> <p>5. Noted and welcomed.</p> <p>CE Recommendation: A minor modification to the text of Action 2.26 as per item 3 above.</p>
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Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
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<p>KK235-LACAP-2</p>	<p>National Federation of Group Water Schemes</p>	<p>1. The submission urges local authorities to be cognisant of the community-owned and community-operated group water scheme sector, and also issues related to drinking water provision, in the Plan.</p> <p>2. It outlines measures which Group Water Schemes are currently undertaking in terms of provision of potable drinking water, and co-benefits for waterbodies and the wider environment through source protection efforts. It refers to the potential impact of climate change on water availability, and the potential contribution that the group water scheme sector can make to climate action at a local level.</p>	<p>Response: Kilkenny County Council welcomes the submission from the National Federation of Group Water Schemes.</p> <p>1. Noted. The Council acknowledges the role and value of Group Water Schemes. Policies relating to drinking water provision are addressed in the Kilkenny City and County Development Plan 2021-2027, which underpins this Plan. Actions 3.10 and 3.11 of the Plan address protection of water quality and water provision as follows: Action 3.10: <i>Assess feasibility of identifying waterbodies that are both particularly vulnerable to extreme climate events, and at risk of not meeting the requirements of the EU Water Framework Directive.</i> Action 3.11: <i>Assess the need for guidance/ planning policy, regarding the impact of new development proposed for areas determined to have a water supply and quality constraint (i.e., from climate related drought, extreme rainfall events).</i></p> <p>2. Noted and welcomed.</p> <p>CE Recommendation: No Change to the Draft Plan.</p>
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Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
<p>KK235-LACAP-27</p>	<p>An Taisce, Kilkenny Association</p>	<p>1. The submission recommends changing the Kilkenny City bus from diesel to electric to demonstrate leadership on moving from fossil fuels.</p>	<p>Response: Kilkenny County Council welcomes the submission from An Taisce, Kilkenny Association.</p> <p>1. The City Bus Service is administered by the National Transport Authority (NTA). The use of electrically powered</p>

	<p>2. Recommends that Kilkenny City bus should run more frequently, especially at busy times; be smaller in size, and be free for users.</p> <p>3. Recommends that solutions are provided for EV charging for people living in urban terraced houses.</p> <p>4. Recommends that developers and Management Committees of apartment blocks should be required to apply of SEAI grants to install EV chargers in car parking area.</p> <p>5. Recommends an online system for booking fast EV chargers to avoid delays and conflicts.</p> <p>6. Suggests that targets are needed for cutting the use of raw materials and encouraging re-use, especially clothing.</p> <p>7. Recommends that Bring Centres be provided within or very close to towns, and drop-off collection points for later transfer to recycling centres.</p> <p>8. Recommends that a covered building be provided at Dunmore Recycling Centre or elsewhere to facilitate recycling of furniture, and workers upskilled to restore items.</p> <p>9. Encourage native tree planting and distribute base-root species to residents associations, and to publicly owned/managed sites e.g. rail station, hospital, health centre, churches.</p>	<p>buses is being continually reviewed by the NTA. Kilkenny County Council liaises regularly with the NTA and are currently preparing a report, as part of the Sustainable Urban Mobility Plan (SUMP) process, that will be presented to the NTA for their views. Action 2.10 in the Plan addresses this as follows: <i>Work with the NTA to enhance public transport options and connectivity to the surrounding area and regions.</i></p> <p>2. See item 1 above.</p> <p>3. The development of EV infrastructure will be guided by a Regional Infrastructure Strategy, in preparation. This is addressed through Action 2.3 in the Plan <i>“Develop and implement a Regional EV Infrastructure Strategy in collaboration with neighbouring local authorities. Advocate and exert influence and control, as appropriate, to ensure such development promotes climate action co-benefits and does not contravene relevant environmental protection criteria or cause significant negative environmental effects.”</i></p> <p>4. As for item 3 above.</p> <p>5. As for item 3 above.</p> <p>6. This is a matter for national waste policy.</p> <p>7. The issue of recycling and waste disposal receptacles will be addressed in the new Kilkenny County Council Litter Management Plan 2024-2026 currently in preparation, under Objective 1 to Promote Recycling and Recovery.</p>
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		<p>10. Recommends the provision of public transport and off-road cycle paths in the county, and promotion of car sharing.</p> <p>11. Recommends an acceleration of the move to renewable energy and promotion of PV panels at a national level.</p>	<p>8. This is addressed in Action No. 5.16 of the Plan: <i>“Explore the potential to repurpose, upcycle and/or to use waste collected at Dunmore Civic Amenity Site to generate new products and enterprises, having due regard to the need to comply with relevant provisions of the Waste Management Act”</i>.</p> <p>9. This is addressed in Action 3.2: <i>“Promote and facilitate tree, woodland and hedgerow protection, planting and management on public and private land 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”</i>.</p> <p>10. These items are addressed through a number of actions in the Plan, as follows: Action 2.9: <i>Enhance permeability to support active travel having due regard to environmental sensitivities such as traffic and transport constraints and aspects, the receiving water environment, local air quality, biodiversity, and European sites.</i> Action 2.10: <i>Work with the NTA to enhance public transport options and connectivity to the surrounding area and regions.</i> Action 2.11: <i>Integrate transport modes and enable a shift to sustainable modes through the effective management of parking demand and development of park and ride/stride and multi-modal hubs. Ensure such development promotes climate action co-benefits, including SuDS and nature-based solutions, and does not contravene relevant environmental protection criteria or cause significant negative environmental effects.</i> Action 2.12: <i>Develop a cycle network for Kilkenny City and larger urban areas. Ensure the cycle network is planned in a manner that has due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites and cultural heritage.</i></p>
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			<p>Action 2.13: <i>Implement the "Safe Routes to School Programme", having due regard to environmental sensitivities such as traffic and transport constraints and aspects, the receiving water environment, local air quality, biodiversity, and European sites.</i></p> <p>Action 2.14: <i>Communicate, raise awareness and encourage participation in sustainable and active travel</i></p> <p>Action 2.15: <i>Explore feasibility of new Park and Ride locations on Regional and National Roads linked to Motorways & public transport.</i></p> <p>11. Noted. This is a matter for national policy.</p> <p>CE Recommendation: No Change to the Draft Plan.</p>
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Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-23	Kilkenny LEADER Partnership (KLP)	<p>1. The submission proposes that the Plan has a specific focus on encouraging and supporting the growth of public transport modes. It proposes that Kilkenny County Council continues to work with KLP on the Kilkenny Integrated Transport Evolution (KITE) and European Union's SMARTA-NET initiative.</p> <p>2. The submission proposes that communities and landowners be encouraged to investigate and develop technical and appropriately assessed plans for the use of 'natural flood defences' in the county, assisted by KLP.</p> <p>3. The submission proposes that <i>The Nore River Catchment Trust</i> (NCRT) and other river trust bodies in the county be formally recognised and supported in their</p>	<p>Response: Kilkenny County Council welcomes the submission from Kilkenny LEADER Partnership.</p> <p>1. Noted. The Plan has a number of actions which specifically address support for public transport as follows: Action 2.10: <i>"Work with the NTA to enhance public transport options and connectivity to the surrounding area and regions."</i></p> <p>Action 2.11: <i>Integrate transport modes and enable a shift to sustainable modes through the effective management of parking demand and development of park and ride/stride and multi-modal hubs. Ensure such development promotes climate action co-benefits, including SuDS and nature-based solutions,</i></p>

work to engage with communities, businesses and agencies towards a sustainable strategy for the county's waterways.

4. The submission outlines details of the Social Inclusion Community Activation Programme (SICAP) 2024 – 2028 Framework in relation to climate action. It identifies Local Priority Groups (LPG's) in the county, and refers to the Smart Villages programme, International Protection Applicants and Urlingford Town Team "connection plan" to the Midlands Region Just Transition programme.

and does not contravene relevant environmental protection criteria or cause significant negative environmental effects. Kilkenny County Council will continue to work with KLP on the Kilkenny Integrated Transport Evolution (KITE) and European Union's SMARTA-NET initiative.

2. The Plan has a number of actions which support incorporating nature-based solutions, including in Flood Relief Schemes, as follows:

Action 1.9: *"Deliver Flood Relief Schemes under the Catchment and Flood Risk Assessment Management (CFRAM) Programme, and Minor Flood Mitigation Works, incorporating nature based solutions, where possible, whilst having appropriate regard to environmental protection requirements associated with flood resilience development"*.

Action 3.8: *"Implement Nature-based Solutions and biodiversity enhancement through the planning process"*.

The OPW are the body responsible to manage river flooding through the Catchment Flood Risk Management Programme (CFRAM). The 2018 Programme identified 6 communities in the County, namely: Graiguenamanagh, Ballyhale, Piltown, Freshford, Inistioge and Thomastown, where interventions are required and have committed to progressing these schemes through Kilkenny County Council. Graiguenamanagh and Ballyhale are in progress and KCC are involved in a pilot on Piltown and Freshford. There are other areas for assessment / further consideration – namely Callan and the Breagagh, and these will be considered by the OPW in future CFRAM Reports, the next of which is due in 2025.

			<p>Noting this context, Kilkenny County Council welcomes plans or developments relating to nature-based solutions, and these will be assessed through the planning process.</p> <p>3.The Council acknowledges and supports the work of communities in relation to engagement and participation on river management in the County. Section 8.4.1 of the Kilkenny City & County Development Plan 2021-2027 addresses this, as follows: <i>“The Council will promote the natural amenity potential of the Rivers Nore, Suir and Barrow in order to facilitate the development of amenity, recreational, biodiversity and tourism benefits for the city and county generally, and will work with adjoining local authorities, agencies and communities to improve access and facilities along the rivers in appropriate locations subject to the availability of resources.”</i></p> <p>In addition, Kilkenny County Council will work with LAWPRO and community organisations such as the Nore River Catchment Trust to address the interlinked issues of climate change and water quality in the river catchments.</p> <p>4. Noted and welcomed</p> <p>CE Recommendation: No Change to the Draft Plan.</p>
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Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-19	An Taisce Green Schools	1. The submission welcomes the Draft Plan and outlines details of the Green Schools programme, and in particular the Green-Schools Travel Theme, and Green Schools Travel Officers. Examples of actions undertaken by the	<p>Response: Kilkenny County Council welcomes the submission from the An Taisce Green Schools Programme.</p> <p>1. Noted.</p> <p>2. Noted and welcomed</p>

	<p>Green Schools Travel theme which are relevant to actions in the Plan are provided.</p> <p>2. Green Schools can provide valuable insights on sustainable school travel and would welcome the opportunity to liaise with the Council.</p> <p>3. Green Schools Travel supports the co-benefits of sustainable mobility including travel to school communities.</p> <p>4. The submission seeks clarity on some of the data in Figure 3.1 Profile of County Kilkenny. It highlights inaccuracies in the data regarding the number of schools and the population (i.e. total number of schools is 71 not 61, and the population is 104,160 not 04,160).</p> <p>5. The submission recommends considering non-mainstream educational organisations, and altering schools to “schools and educational facilities”.</p> <p>6. Green Schools Travel funds cycle parking and cycle right training in participating schools at 100%.</p> <p>7. Welcomes the action regarding the Safe Routes to School programme coordinated by An Taisce, and recommends that the Plan specifically mentions engagement with the An Taisce Green Schools Travel programme.</p> <p>8. Recommends that promotion of eco-driving training in the public realm, in addition to training for local authority fleet staff, is included in Plan.</p>	<p>3. Noted.</p> <p>4. Noted, and agreed. It is proposed to make a minor modification to correct the data in Figure 3.1 relating to the number of schools in Kilkenny and the population size.</p> <p>5. KCC supports climate action in both the formal and informal education sectors. Where actions relate to the education sector, such as Action 4.11 this is taken to mean both formal and informal education. Action 4.11: <i>Support and collaborate with the education sector to provide information, training and educational programmes on local climate action, and to undertake research.</i> Other actions that reference schools relate to programmes that are delivered in schools.</p> <p>6. Noted.</p> <p>7. Noted. Action No.2.13 in the Plan refers to the "Safe Routes to School Programme" as follows: “Implement the "Safe Routes to School Programme", having due regard to environmental sensitivities such as traffic and transport constraints and aspects, the receiving water environment, local air quality, biodiversity, and European sites”. An Taisce and the NTA are specifically identified as a Partner in the delivery of this action.</p> <p>8. Action 2.4 in the Plan “<i>Develop a Fleet Decarbonisation Strategy for Kilkenny County Council Fleet. Ensure the strategy aligns with sustainability principles</i>”, includes a measure to training local authority fleet staff in eco-driving, as this is within the remit of the Council. Driving training for the public is not within the remit of the Council.</p> <p>9. Noted and welcomed.</p> <p>10. This will be addressed under Action 2.14: of the Plan: <i>Communicate, raise awareness and encourage participation in</i></p>
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	<p>9. The Green Schools Travel Programme would welcome the opportunity to collaborate with Kilkenny County Council on no-idling campaigns for schools.</p> <p>10. Proposes that a pathway to communicate the results of walkability/cyclability audits conducted in schools be identified.</p> <p>11. Recommends that communities applying to the Community Climate Action Fund consult with local schools in relation to the findings of walkability/cyclability audits.</p> <p>12. Recommends developing “Park & Stride” initiatives.</p> <p>13. Green-Schools would welcome the opportunity to meet with, collaborate and support the delivery of the Plan.</p>	<p><i>sustainable and active travel the Green Schools Travel Programme.</i></p> <p>11. Noted.</p> <p>12. Park & Stride initiatives are addressed in Action 2.12: of the Plan <i>“Integrate transport modes and enable a shift to sustainable modes through the effective management of parking demand and development of park and ride/stride and multi-modal hubs”</i></p> <p>13. Noted and welcomed.</p> <p>CE Recommendation: Minor modification to correct the data in Figure 3.1.</p>
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Submissions from Communities and Individuals

Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-12	Community Gardens Ireland	<p>1. The submission outlines the work of Community Gardens Ireland which supports and promotes community gardens on the island of Ireland. It includes a profile of allotments and community gardens in Ireland and Europe, and their role in climate action.</p> <p>2. The submission recommends that the Plan includes recommendations to increase the number of allotments and community gardens throughout Ireland through the following actions:</p>	<p>Response: Kilkenny County Council welcomes the submission from Community Gardens Ireland.</p> <p>1. Noted.</p> <p>2. Kilkenny County Council recognises the importance of community gardens and allotments. The contributions made by these gardens and allotments are realised by Kilkenny County Council, who will continue to support and facilitate the development of these within the county. Section 8.8 of the</p>

		<p>(a) recognise growing your own food as a climate friendly action for communities.</p> <p>(b) recommend including Community Growing in the Plan</p>	<p>Kilkenny City and County Development Plan 2021-2027, which underpins this Plan, states that “<i>The Council will support and facilitate the development of allotments in the county</i>”.</p> <p>The Plan includes an action to identify and use Council owned land for nature based initiatives, which could also include allotments and community gardens. Action 3.4: <i>Identify, map and utilise local authority owned land for habitat enhancement/restoration and nature based solutions, whilst taking measures to promote the use of native plant/animal species over non-natives, as appropriate.</i></p> <p>In addition, Action 4.1 of the Plan regarding the Community Climate Action Fund, a grant programme to support local communities in taking climate action, welcomes projects such as community gardens and allotments. Action 4.1: <i>Deliver the Community Climate Action Fund. Ensure projects supported by this action are delivered in a manner that has due regard to: All relevant environmental sensitivities (e.g., heritage, biodiversity, European site related sensitivities); and Opportunities to promote climate action co-benefits, where possible (e.g., through the use of nature-based solutions or sustainable drainage systems).</i></p> <p>CE Recommendation: No Change to the Draft Plan.</p>
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Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-15	Global Action Plan	1. The submission congratulates Kilkenny County Council on the quality of the draft Plan, and invites the Council to partner with the organisation to address climate action.	<p>Response: Kilkenny County Council welcomes the submission from Global Action Plan</p> <p>1. Noted.</p>

	<p>2. Recognises the emphasis on local authority training and recommends that the Plan outlines the logic behind the priorities in Strategic Theme 4 and how the actions will empower and activate business and community.</p> <p>3. Recommends that the Plan addresses the barriers people experience in trying to tackle climate change, i.e. not only to funding and knowledge, but also values, emotions and perceptions of disempowerment. It recommends that it includes proposals to help the public re same.</p> <p>4. Recommends further reflection on how the Plan can contribute to Just Transition, Just Resilience and Social Inclusion, and a greater emphasis on inclusion and engagement.</p> <p>5. The submission refers to the Plan being difficult to access for people with a disability or literacy challenges.</p> <p>6. The submission refers to the importance of green spaces in relation to addressing climate change and requests an explicit emphasis on the role of Kilkenny County Council in supporting allotments and community gardens.</p> <p>7. The submission provides an overview of the services and programmes delivered by Global Action Plan, and offers to assist Kilkenny County Council through delivery of same.</p>	<p>2. The rationale underpinning the Strategic Themes is clearly outlined in Sections 5.1 to 5.5 of the Plan. In addition, the table of actions (Section 5.6) includes a clear explanation of the aim of each action.</p> <p>3. This is comprehensively addressed in the Plan. Objective 4.1 of the Plan specifically addresses this issue, as follows: “Support and empower communities to adapt to the impacts of climate change and facilitate local climate action through education and awareness initiatives, cultural and creative programmes and grants”. In addition, Action No’s 4.1 to 4.13 provide clear details of how this Objective will be met.</p> <p>4. These issues are clearly and comprehensively dealt with in the Plan. See item 3 above. The Plan was developed by the Climate Action Steering Committee with representatives from each Service Area in the Council including the Community Section which represents and address a range of social inclusion and engagement programmes including the Social Inclusion Programme, Heathy Ireland Programme, Traveller Community Movement, Older People’s Forum, PPN, Children and Young Persons Forum etc. Kilkenny County Council undertook comprehensive public engagement at both the Pre-Draft and Draft stages of the Plan. The Plan is underpinned by the 17 United Nations Sustainable Development Goals, which aim to “end poverty, protect the planet and improve lives and prospects of everyone, everywhere”. See Section 2.2 and the list of Climate Actions (Section 5.6).</p>
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			<p>5. Kilkenny County Council is working towards making all of our information accessible in line with the recently adopted Kilkenny County Council Disability Inclusion Strategy (2023-2026).</p> <p>6. The Kilkenny City and County Development Plan 2021-2027, which underpins this Plan, includes a specific policy supporting the development of allotments in the county (See Section 8.8). The Community Climate Action Fund is open to applications for community gardens and allotments. Action 4.1 refers: <i>Deliver the Community Climate Action Fund. Ensure projects supported by this action are delivered in a manner that has due regard to: All relevant environmental sensitivities (e.g., heritage, biodiversity, European site related sensitivities), and; Opportunities to promote climate action co-benefits, where possible (e.g., through the use of nature-based solutions or sustainable drainage systems).</i></p> <p>7. Noted.</p> <p>CE Recommendation: No Change to the Draft Plan.</p>
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Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-1	Sinead Marshall	<p>1. The submission questions the expertise of the author of the Plan in relation cultural heritage, and climate and heritage.</p> <p>2. It states that the Heritage Council should be consulted with in relation to the Plan.</p>	<p>Response: Kilkenny County Council welcomes the submission from Sinead Marshall.</p> <p>1. The team who prepared the Draft Climate Action Plan have extensive experience in a range of disciplines, including heritage. The Plan also draws on the expertise of both the</p>

	<p>3. It states that screening and scoping of the heritage section of the Plan should be undertaken by a specialist archaeologist.</p> <p>4. The submission states that there is a gap in the Plan due to the fact that it doesn't mention unrecorded or unknown cultural heritage monuments which may be vulnerable to climate change, including underwater archaeology. It recommends that Plan draws attention to this risk and informs the public what to do if they find heritage sites or materials exposed due to climate change.</p> <p>5. The submission states that the brown sett paving stones used in Kilkenny City in recent years are problematic in terms of accessibility.</p> <p>6. The submission states that the fact that bicycles can't go both ways on some one-way streets in the city should be re-considered.</p> <p>7. The submission states that there are no lamppost-type electric vehicle chargers in the county. It recommends that they are used in the Decarbonising Zone to encourage and facilitate EV charging in the city for residences in the city without driveways.</p>	<p>Heritage Officer and Architectural Conservation Officer, who were both directly involved in the development of the Plan.</p> <p>2. The Heritage Council was consulted on both the pre-Draft and Draft stages of the Plan. This included participation in a "Heritage and Climate Action Workshop" organised by the Climate Action Regional Office and Heritage Council. The actions in the Plan were further informed by a submission from the Heritage Council to Local Authority Climate Action Plans developed as an outcome of this workshop.</p> <p>3. The Plan was subject to a Strategic Environmental Assessment (SEA) process, as part of the preparation process. This included scoping and screening of the Environmental Baseline, which includes Cultural Heritage (Archaeology and Architecture). The SEA was undertaken by Feehily Timoney Environmental Consultants. A copy of the report was published with the Plan and is available here.</p> <p>4. This is a matter for the Kilkenny City and County Development Plan 2021-2027, which underpins the Climate Action Plan, and addresses Kilkenny's recorded and unrecorded archaeological heritage, and includes guidance on what to do if unrecorded archaeology is found. (Section 9.3.1 Archaeological Heritage).</p> <p>Also, guidance on what to do when unrecorded archaeology is found will be reviewed and updated based on new provisions within the <i>Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023</i>, which establishes for the first time a generally applicable system for the protection of newly discovered archaeology. The Act also includes revisions to strengthen the existing protection of underwater archaeology,</p>
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			<p>which will inform the guidance as outlined in The Kilkenny City and County Development Plan 2021-2027.</p> <p>5. The Kilkenny City Sustainable Urban Mobility Plan (SUMP), in preparation, will address issues in relation to active travel in the City. The following actions in the Plan also refer to this: Action 2.5: <i>Adopt and implement the Kilkenny City Sustainable Urban Mobility Plan and Mobility Management Plans for other towns in the county.</i> Action 2.8: <i>Encourage independent journeys for all.</i></p> <p>6. This issue will be addressed through the Kilkenny City Sustainable Urban Mobility Plan (SUMP), currently in preparation. The following actions in the Plan address this: Action 2.5: <i>Adopt and implement the Kilkenny City Sustainable Urban Mobility Plan and Mobility Management Plans for other towns in the county.</i> Action 2.9: <i>Enhance permeability to support active travel having due regard to environmental sensitivities such as traffic and transport constraints and aspects, the receiving water environment, local air quality, biodiversity, and European sites.</i></p> <p>7. The provision of EV charging is addressed in Action 2.3 of the Plan, and appropriate forms of EV chargers will be considered, in accordance with national policy and guidance. Action 2.3: <i>“Develop and implement a Regional EV Infrastructure Strategy in collaboration with neighbouring local authorities. Advocate and exert influence and control, as appropriate, to ensure such development promotes climate action co-benefits and does not contravene relevant environmental protection criteria or cause significant negative environmental effects”.</i></p> <p>CE Recommendation: No Change to the Draft Plan.</p>
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Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-3	Reg Cooper	<ol style="list-style-type: none"> 1. Submission suggests Kilkenny retailers/coffee shops to adopt a voluntary system for use of reusable rather than disposable cups. 2. Suggests provision of recycling bins on the Parade and Canal Square for plastic bottles and other recyclables. 3. Suggests by-law banning disposable vapes. 4. Suggests a motion to ban tractor runs due to the carbon footprint. 	<p>Response: Kilkenny County Council welcomes the submission from Reg Cooper.</p> <ol style="list-style-type: none"> 1. Kilkenny County Council would welcome such an initiative in the Kilkenny City Decarbonisation Zone, and support Kilkenny retailers in developing it. 2. The issue of recycling and waste disposal receptacles will be addressed in the new Kilkenny County Council Litter Management Plan 2024-2026 currently in preparation, under Objective 1 to Promote Recycling and Recovery. <p>In addition, from 1st Feb 2024, all PET plastic bottles and aluminium and steel cans between 150mls and 3litres will be eligible for the Deposit Return Scheme (DRS), via producers and retailers.</p> <ol style="list-style-type: none"> 3. A national review of disposable vapes is currently underway, including provision of new legislation. We await national guidance. 4. Tractor Runs and other charity events are managed/permitted by An Garda Síochána. They are not within the control of Kilkenny County Council. <p>CE Recommendation: No Change to the Draft Plan.</p>

Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-4	Reg Cooper	1. The submission suggests the removal of trees in two locations on the Lacken Walk to improve views across the River Nore.	<p>Response: Kilkenny County Council welcomes the submission from Reg Cooper.</p> <p>1. This is not a matter for the Plan.</p> <p>As per Action No's 3.1 and 3.2, the Plan aims to increase the tree canopy to support urban cooling and carbon storage in the county, whilst protecting and facilitating tree growth which will also improve air quality, give flood relief and enhance biodiversity along the river.</p> <p>CE Recommendation: No Change to the Draft Plan.</p>

Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-5	Reg Cooper	1. Submission refers to the fact that dog litter bags supplied by Kilkenny County Council in public areas are not biodegradable.	<p>Response: Kilkenny County Council welcomes the submission from Reg Cooper.</p> <p>1. The supply of biodegradable dog litter bags is currently being reviewed, and will be addressed in the Kilkenny County Council Litter Management Plan 2024-2026 currently in preparation.</p> <p>CE Recommendation: No Change to the Draft Plan.</p>

Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-6 & KK235-LACAP-7 (duplication)	Reg Cooper	<p>1. The submission suggests the phasing in of dual flush valves on toilets in Kilkenny County Council offices and Local Authority housing to reduce the draw on public water supply, mitigating against the effects of drought.</p> <p>Note: submissions KK235-LACAP-6 and KK235-LACAP-7 were duplicate submissions. For this reason, they have been dealt with here as one submission.</p>	<p>Response: Kilkenny County Council welcomes the submission from Reg Cooper.</p> <p>1. Dual flush push button toilets are generally installed in new build housing developed by Kilkenny County Council, in accordance with the Building Regulations, specifically TGD Part G – G2 (4). With regard to existing housing stock, if the full toilet and cistern need to be replaced, dual flush push button toilets are installed, unless that system doesn't meet the tenants needs.</p> <p>In existing local authority facilities, where toilet facilities are replaced, they will be replaced with dual flush valves.</p> <p>CE Recommendation: No Change to the Draft Plan.</p>

Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-9	Reg Cooper	<p>1. Submission suggests introducing a bye-law to ban election posters to reduce carbon footprint and non-recyclable waste.</p>	<p>Response: Kilkenny County Council welcomes the submission from Reg Cooper.</p> <p>1. The erection of election posters is governed by national legislation (i.e. Litter Pollution Act 1997 and the Electoral (Amendment) (No. 2) Act 2009).</p> <p>The issue of election posters will be addressed in the Litter Management Plan 2024-2026, currently in preparation.</p> <p>CE Recommendation: No Change to the Draft Plan.</p>

Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-14	Candida Frith-Macdonald	<p>1. The submission refers to the Tracking Measures/ Key Performance Indicators for actions in the Plan and suggests that target numbers also be included.</p> <p>2. The submission refers to the % of Elected Representatives who have undertaken climate action training as outlined in the Plan, and suggests that training should be mandatory.</p> <p>3. The submission calls for reporting and monitoring of the actions.</p>	<p>Response: Kilkenny County Council welcomes the submission from Candida Frith-Macdonald.</p> <p>1. All actions in the plan include a Key Performance Indicator (KPI)/ Tracking Measure, and also identify the Lead Department responsible for implementing the action. The template and methodology used is prescribed in the “Local Authority Climate Action Plan Guidelines” (Department of Environment, Climate and Communications. 2023). It is considered comprehensive and robust.</p> <p>The two key targets which underpin the Plan are (i) 51% reduction in emissions, and (ii) 50% energy efficiency, across local authority buildings, facilities, fleet and public lighting – as mandated by the National Climate Act. See section 1.4 of the Plan.</p> <p>2. Climate Action training is provided to Elected Representatives both through the Local Authority National Training Services Group, and also by the Association of Irish Local Government.</p> <p>3. The delivery of actions will be reported on, monitored, and communicated in order to ensure transparency as outlined in the Plan in the following action: Action 1.6: “Monitor, Report and Communicate on delivery of Kilkenny County Council climate actions and targets”</p> <p>CE Recommendation: No Change to the Draft Plan.</p>

Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-16	Matias Poggini	1. The submission proposes that the former train station site at MacDonagh Junction be developed as a Central HUB for Transportation, serving intra-city and national transport connections including the Kilkenny City Bus Service and bike parking facilities.	<p>Response: Kilkenny County Council welcomes the submission from Matias Poggini.</p> <p>1. Noted. The Plan includes actions which address improved public transport, connectivity, and transport hubs, as follows: Action 2.5: <i>Adopt and implement the Kilkenny City Sustainable Urban Mobility Plan and Mobility Management Plans for other towns in the county.</i> Action 2.10: <i>Work with the NTA to enhance public transport options and connectivity to the surrounding area and regions.</i> Action 2.11: <i>“Integrate transport modes and enable a shift to sustainable modes through the effective management of parking demand and development of park and ride/stride and multi-modal hubs. Ensure such development promotes climate action co-benefits, including SuDS and nature-based solutions, and does not contravene relevant environmental protection criteria or cause significant negative environmental effects”.</i></p> <p>CE Recommendation: No Change to the Draft Plan.</p>

Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-17	Matias Poggini	1. The submission proposes that some of the green areas in the city be developed as parks for nature and recreation, to include areas for self-seeding, no-mow areas, and seasonal mowing and community gardens.	<p>Response: Kilkenny County Council welcomes the submission from Matias Poggini.</p>

1. The Plan contains a comprehensive number of actions which support green areas, wildlife friendly management and community gardens, as follows:

Action 3.4: *Deliver a Pollinator Programme to protect and enhance pollinator habitats on Council owned land and in the wider- county, whilst taking measures to promote the use of native plant species over non-natives, as appropriate.*

Kilkenny County Council is a signatory of the All Ireland Pollinator Programme and as such has commenced a programme of pollinator friendly management. See [here](#).

Action 3.6: *Identify, map and utilise local authority owned land for habitat enhancement/restoration and nature-based solutions, whilst taking measures to promote the use of native plant/animal species over non-natives, as appropriate.*

Regarding community gardens, Kilkenny County Council recognises the importance of community gardens and allotments. The contributions made by these gardens and allotments are realised by Kilkenny County Council who will continue to support and facilitate the development of these within the county. Section 8.8 of the [Kilkenny City and County Development Plan 2021-2027](#), which underpins this Plans, states that “*The Council will support and facilitate the development of allotments in the county*”.

In addition, Action 4.1 of the Plan, regarding the Community Climate Action Fund, a grant programme to support local communities in taking climate action, welcomes projects such as community gardens and allotments. **Action 4.1:** *Deliver the Community Climate Action Fund. Ensure projects supported by this action are delivered in a manner that has due regard to: All relevant environmental sensitivities (e.g., heritage, biodiversity,*

		<p>European site related sensitivities); and Opportunities to promote climate action co-benefits, where possible (e.g., through the use of nature-based solutions or sustainable drainage systems).</p> <p>CE Recommendation: No Change to the Draft Plan.</p>
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Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK-C235-LACAP-20	Martin Rochford	<p>1. The submission recommends that there should be more focus on specific measurable actions, including measuring and reporting on actions annually, and identifying the individual(s) responsible for the action.</p> <p>2. The submission recommends amendments to Planning policy in relation to the following:</p> <p>(a) Restrict building demolition to prevent loss of embodied carbon, including favouring renovation over replacement.</p> <p>(b) Incentivise smaller houses by increased planning fees by square meter, including garages</p> <p>(c) Favour timber frame houses over concrete build to reduce carbon</p> <p>(d) Prohibit paving of gardens to reduce water run-off, or allow only where permeable surface is used</p> <p>(e) Restrict car parking in new developments to discourage car usage</p> <p>(f) Favour dense development, and restrict one-off housing outside towns or villages, progressively year-on-year</p>	<p>Response: Kilkenny County Council welcomes the submission from Martin Rochford.</p> <p>All actions in the plan include a Key Performance Indicator (KPI)/ Tracking Measure, and also identify the Lead Department responsible for implementing the action. The template and methodology used is prescribed in the “Local Authority Climate Action Plan Guidelines” (Department of Environment, Climate and Communications. 2023).</p> <p>The monitoring and reporting process as outlined in the Plan is considered robust, and will ensure transparency in reporting on actions. It is addressed in the following action: Action 1.6 in the Plan addresses this as follows: <i>“Monitor, Report and Communicate on delivery of Kilkenny County Council climate actions and targets.”</i></p> <p>2. Many of the issues raised are already dealt with in planning policy in the Kilkenny City and County Development Plan 2021-2027, which underpins the Climate Action Plan – see Sections 2.5; 4.2.1; 10.2.9.1; 9.3.3; 9.3.8; 13.23.2.</p>

(g) Incentivise rainwater harvesting in domestic and commercial buildings to reduce consumption of treated water which has significant carbon footprint

The Climate Action Plan includes an action in relation to review of planning policy to ensure that planning policies support best practice in climate action, as follows: **Action 1.14:** *Peer review planning policies regarding climate action.*

In relation to the specific issues (2a)– (2g):

(2a) The Plan acknowledges the importance and value of retaining embodied carbon and has addressed in the following Actions: **Action 2.28:** *“Prioritise, facilitate and raise awareness about the value of retaining embodied carbon in developments”*

Action 2.31: *“Develop a planning policy which supports the re-use of existing buildings, having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity, and the need to appropriately protect and conserve protected structures”*

Action 2.33: *“Achieve Home Performance Index (HPI) Gold Standard on all new Kilkenny County Council social housing, having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity, and the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations”.*

(2b) This issue is addressed in relation to local authority housing in the following action: **Action 2.34:** *“Right-sizing Programme for tenants of local authority housing.”*

(2c) This is a matter for the City and County Development Plan.

(2d) This is a matter for the City and County Development Plan

(2e) This is a matter for the City and County Development Plan.

			<p>(2f) Compact growth is a Core Strategy of the Kilkenny City and County Development Plan 2021-2027 (Section 2.4.1)</p> <p>(2g) This issue is addressed in Action 3.8 of the Plan: <i>“Implement Nature-based Solutions and biodiversity enhancement through the planning process.”</i></p> <p>CE Recommendation: No Change to the Draft Plan.</p>
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Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-22	Mary Rice	<ol style="list-style-type: none"> 1. The submission recommended that grants to farmers or landowners in relation to water pollution should provide for nature-based solutions only. 2. The submission refers to grants and slurry spreading in relation to increased rainfall with climate change. 3. Recommend that the Kilkenny City Bus service use smaller, electric buses to reduce emissions. 4. Recommends that all actions in the Plan are measurable and that each action should identify only one department as being responsible for delivery of the action. 	<p>Response: Kilkenny County Council welcomes the submission from Mary Rice.</p> <p>1. Kilkenny County Council is committed to using nature-based solutions where possible. As per Section 5.3 Strategic Goals in The Plan, Strategic Theme 3, Objective 3.1, one of Kilkenny County Council’s goals is to protect and manage the natural environment to support biodiversity, water catchments, carbon storage and urban cooling; and to promote nature-based solutions in developments.</p> <p>Many of the actions in the Plan address the use of nature-based solutions, (Actions: 1.9, 2.7, 2.11, 2.17, 3.6, 3.7, 3.8 and 4.1). Actions 1.9, 2.17 and 3.6 relating to flood relief schemes, water, land and drainage solutions.</p> <p>Regarding grants for septic tanks Kilkenny County Council provides grant assistance for the repair or replacement of domestic waste water treatment systems only.</p>

Re grants provided by Kilkenny County Council for farmers or land owners, LAWPRO will administer the Water European Innovation Partnership (EIP) scheme, which provides grant funding for targeted actions to reduce losses of nutrients, sediment and pesticides from agricultural lands. The grant scheme includes nature-based measures, such as enhanced riparian margins, small wetland ponds where these are appropriate. See [here](#) for further information.

2. Slurry spreading, Farmyard Manure, Crop Effluent and Soiled Water Management storage periods and spreading timeframes are set by the Department of Agriculture, Food and the Marine. Kilkenny County Council's role is in enforcement of the Good Agricultural Practise recommendations by carrying out farm inspections in accordance with Department guidelines.

3. The City Bus Service is administered by the National Transport Authority (NTA). The use of electrically powered buses is being continually reviewed by the NTA. Currently the bus service in Kilkenny runs for 15 hours per day so an electric bus would need to operate for that period without the need to be re-charged. The buses used are mid-size buses with a 30-seat capacity that can also cater for wheelchair users and parents with prams. To use smaller buses would reduce their capacity and they may not be able to cater for all users.

The Council supports the introduction of more routes, more direct routes, and more frequent services at peak times. We liaise regularly with the NTA and are currently preparing a report as part of the Sustainable Urban Mobility Plan (SUMP) process that will be presented to the NTA for their views. This is addressed in **Action 2.10** in the Plan as follows: *Work with*

			<p><i>the NTA to enhance public transport options and connectivity to the surrounding area and regions.</i></p> <p>4. The Monitoring and Evaluation Framework used in the Plan is considered robust and appropriate. It is in accordance with that prescribed by the “Local Authority Climate Action Plan Guidelines” (2023) developed by the Department of Climate, Environment and Communications.</p> <p>Many of the actions list several departments in the Local Authority where the responsibility of such an action falls across more than one service area, it is also imperative that there is joined up thinking and all sectors of the Local Authority work together to deliver on our targets and ambitions.</p> <p>CE Recommendation: No Change to the Draft Plan.</p>
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Submission Number	Submission Name	Submission Summary	CE Response and Recommendation
KK235-LACAP-13	Kilkenny Public Participation Network (PPN)	<p>1.The PPN welcomes the Plan and supports the vision for a greener and more sustainable county. The submission is based on the PPN’s Vision for Community Wellbeing Consultations and feedback from PPN membership on the Draft Plan. It includes general observations and detailed observations arranged by theme.</p> <p>2. Transport & Mobility</p>	<p>Kilkenny County Council welcomes the submission from the Kilkenny Public Participation Network.</p> <p>1.Noted.</p> <p>General Note: For the purposes of clarity and to avoid repetition, where actions are referred to more than once in a response, they are listed together at the end of the response.</p> <p>2. Objective 2.2 of the Plan “<i>To provide for and facilitate a shift to active and sustainable travel</i>”, and it’s associated actions deal with the issues raised here.</p>

(a) Liaise with Transport for Ireland and Local Link to expand rural public transport to serve all towns and villages, to reduce car usage and enhance connectivity.

(b) Liaise with Transport for Ireland to extend Kilkenny city bus services with smaller electric buses.

(c) Improve bus stops and routes in rural areas to ensure equitable transportation and reduce isolation.

(d) Raise awareness about the health impacts of car idling, advocating for engine shutdown to save CO2 and curb emissions.

(e) Enforce strict bans on idling near schools and install clear signage re same.

(f) Monitor and report air quality near schools.

(g) Promote 'school trains' to encourage walking groups of students to school, reducing car usage.

(h) Explore 'Go Car' car-sharing options in smaller communities like Graiguenamanagh to reduce reliance on second cars.

(i) Increase the 'Go-Car' fleet in Kilkenny City to provide an alternative to private vehicles.

2(j) Develop a parking app for pre-booking parking spots to reduce driving time spent searching for disabled parking.

2(k) Expand the availability of Bolt Bikes in Kilkenny City.

2(l) Implement two-way cycle lanes on one-way streets and rapid build cycle lanes to enhance cycling infrastructure.

2(m) Advocate for energy efficiency with initiatives like a 'car-free day' campaign and no parking zones in areas like the Brewery Quarter.

2(a) The Council will work to improve public transport and connections to the region, as outlined in **Action 2.10**.

2(b) The City Bus Service is administered by the National Transport Authority (NTA). The use of electrically powered buses is continually reviewed by the NTA. Kilkenny County Council are currently preparing a report as part of the Sustainable Urban Mobility Plan (SUMP) process that will be presented to the NTA for their views. **Action 2.5** in the Plan supports this.

2(c) See item 2(a) above.

2(d) Noted. This is addressed under **Actions 2.13 and 2.14** in the Plan.

2(e): Kilkenny County Council will continue to encourage schools to participate in the Safe Route to School programmes and promote walking, cycling, scooting and wheeling to school the use of park and stride locations
See Item 2(d) above.

2(f): The Council will monitor and report on air quality as outlined in **Action 5.11**.

2(g): As per **Action 2.13** and item 2(e) Kilkenny County Council will continue to encourage schools to participate in the Safe Route to School programmes and promote walking, cycling, scooting and wheeling to school the use of park and stride locations.

2(h) Car sharing is addressed under **Actions 2.11 and 2.15** in the Plan.

2(i) See item 2(h) above.

2(j): Kilkenny County Council in partnership with Park Magic currently operate and will continue to do so a Pay by Phone /

2(n) New cars and vans purchased by Council should be EVs

App parking service available on up to 110 long stay, low tariff parking spaces in the city. As part of the Sustainable Urban Mobility Plan (SUMP) (**Action 2.5**) for Kilkenny City a parking management strategy will be also be developed, also see Kilkenny County Council Disability Strategy 2023-2027.

2(k): Kilkenny County Council will continue to work with shared mobility providers to provide alternative transport options in Kilkenny and monitor usage, as addressed in **Action 2.11**.

2(l): **Actions 2.7 and 2.12** addresses this issue. Options for contra-flow cycle facilities will be incorporated into all future one-way schemes where feasible in line with the National Cycle Manual and the Design Manual for Urban Roads and Streets.

2(m): Kilkenny County Council already actively participates in European Car-Free Day. This is also addressed in **Actions 2.5 and 2.14** in the Plan.

2(n). Reducing emissions in the Council fleet is addressed in **Action 2.4** of the Plan.

Actions relating to the issues raised in “2. Transport and Mobility”

Action 2.4: *Develop a Fleet Decarbonisation Strategy for Kilkenny County Council Fleet. Ensure the strategy aligns with sustainability principles.*

Action 2.5: *Adopt and implement the Kilkenny City Sustainable Urban Mobility Plan and Mobility Management Plans for other towns in the county*

Action 2.7: *Reallocate urban space towards the sustainable movement of people, and placemaking having due regard to opportunities to promote nature-based solutions and*

3. Renewable Energy

3(a) More campaigns highlighting the benefits of solar & wind power on reducing consumer electricity bills, and bolstering Ireland's overall energy independence.

3(b) Ensure clarity in the Climate Action Plan regarding the implementation and measurement of proposed renewable energy measures.

3(c) Encourage homeowners to adopt newer energy sources like heat pumps and explore gas supplies generated by the farming community through biodigesters.

3(d) Investigate reinstating small water wheels for local electricity generation and community-based actions.

environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, and cultural heritage. Prioritise roads and streets currently or likely to be used by public bus services. Work towards ensuring network options are developed between active travel options and public transport routes.

Action 2.10: *Work with the NTA to enhance public transport options and connectivity to the surrounding area and regions.*

Action 2.11: *Integrate transport modes and enable a shift to sustainable modes through the effective management of parking demand and development of park and ride/stride and multi-modal hubs. Ensure such development promotes climate action co-benefits, including SuDS and nature-based solutions, and does not contravene relevant environmental protection criteria or cause significant negative environmental effects.*

Action 2.12: *Develop a cycle network for Kilkenny City and larger urban areas. Ensure the cycle network is planned in a manner that has due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites and cultural heritage*

Action 2.13: *Implement the "Safe Routes to School Programme", having due regard to environmental sensitivities such as traffic and transport constraints and aspects, the receiving water environment, local air quality, biodiversity, and European sites.*

Action 2.14: *Communicate, raise awareness and encourage participation in sustainable and active travel*

Action 2.15: *Explore feasibility of new Park and Ride locations on Regional and National Roads linked to Motorways & public transport.*

3(e) Implement energy-efficient lighting solutions, such as utilizing LED lights to save energy and light pollution, supplemented by motion-sensor-activated public lighting. Implement solar-powered lighting wherever feasible to further enhance energy efficiency.

3(f) Ensure that lighting levels are appropriate to the requirement as LED replacement lights in some areas shine too brightly into homes.

3(g) Provide incentives for community areas to install solar panels.

3(h) Fit all new schools with accessible and affordable solar panels.

Action 5.11: Monitor and report on air quality.

3(a): This issue is addressed at a National level. However, Kilkenny County Council will support and promote national initiatives, as outlined for example in **Actions 4.8 and 4.10** of the Plan.

3(b) The Council will monitor, report and communicate on the delivery of actions in the plan, as outlined in **Action 1.6**.

3(c) Kilkenny County Council will adopt new technologies in new local authority housing developments, and in the delivery of a retrofitting programme for existing local authority homes, as addressed in **Actions 2.33 and 2.35**. The Council will promote the adoption of new energy sources to the public as outlined in **Actions 4.8 and 4.10**. In relation to bio-digestors, this is addressed in **Action 4.12**.

3(d): This is a matter of policy which is addressed in the Kilkenny City and County Development Plan 2021-2027, which underpins this Plan. See Section 11.8.2.

3(e): Kilkenny County Council is the lead authority in the Eastern Region on the Public Lighting and Energy Efficiency Project (PLEEP) to upgrade public lighting to LED. To date over 50% of the public lights in Kilkenny have been converted to LED. See Section 3.3 of the Plan, **and Action 2.2**.

3(f). See item 3(e) above

3(g) **Action 4.1** regarding the Community Climate Action Fund addresses this.

3(h) This is a matter for the Department of Education and is being rolled out through the [Schools Photovoltaic Programme](#).

4. Flood Control & Water

4(a) Prioritize nature-based flood control solutions like wetland restoration and green infrastructure.

Actions relating to issues raised in “3. Renewable Energy”

Action 1.6: *Monitor, Report and Communicate on delivery of Kilkenny County Council climate actions and targets*

Action 2.2 *Continue to deliver the Public Lighting Energy Efficiency Project (PLEEP), whilst continuing to use best available technology to suitably minimise potential environmental effects of lighting.*

Action 2.33: *Achieve Home Performance Index (HPI) Gold Standard on all new Kilkenny County Council social housing, having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity, and the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations.*

Action: 2.35: *Deliver a retrofit programme for Kilkenny County Council Social Housing, having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity, and the need to appropriately protect and conserve protected structures.*

Action 4.1: *Deliver the Community Climate Action Fund. Ensure projects supported by this action are delivered in a manner that has due regard to: All relevant environmental sensitivities (e.g., heritage, biodiversity, European site related sensitivities), and Opportunities to promote climate action co-benefits, where possible (e.g., through the use of nature-based solutions or sustainable drainage systems).*

Action 4.8: *Deliver an educational and awareness programme, through the Library Service, on climate action, sustainability, biodiversity and the circular economy, by providing workshops, information clinics, citizen science kits, home energy kits, books,*

- 4(b) Restore rivers by removing culverts to allow them to spread into flood plains and limit downstream flooding risks.
- 4(c) Climate-proof rezoning plans, avoiding residential development in flood-prone areas, taking into account future increases in rainfall intensity.
- 4(d) Monitor and publicly report river pollution regularly, penalizing incidents.
- 4(e) Prioritize resources for farm and septic tank inspections to improve environmental enforcement.
- 4(f) Create local water reservoirs to conserve water, enhance biodiversity, and mitigate flooding.
- 4(g) Encourage increased water retention in housing estates to slow discharge of rainwater to rivers.
- 4(h) Plant trees along riverbanks to stabilize them.
- 4(i) Halt drainage of bogs to maintain natural water retention.
- 4(j) Ban pesticide use near water sources to protect water quality.
- 4(k) Restrict fertilizer use and prevent dumping by farmers into rivers.
- 4(l) Implement stricter controls and testing of industrial water discharge.
- 4(m) Monitor and regulate unmonitored pipes, such as those discharging untreated wastewater into waterways
- 4(n) Conduct awareness campaigns and education on environmental sustainability, focusing on issues like nitrates in rivers and their causes/effects.

digital resources, educational programmes, and events for festivals/themes (e.g. Science Week, Sustainable Development Goals Week etc).

Action 4.10: *Continue to collaborate with the South East Energy Agency to provide an online home energy information portal/programme*

Action 4.12: *Support climate action on farms through local authority policy and programmes*

4(a) This is comprehensively addressed in the following actions in the Plan: **Actions 1.9, 3.7, 3.8.**

4(b) This is addressed in the Kilkenny City & County Development Plan 2021-2027 (Section 10.2.8).

4(c) This is addressed in the Kilkenny City and County Development Plan 2021-2027 which underpins this Plan. See Sections 2.4.3 and 10.2.6.

4(d) This is a matter for the River Basin Management Plan, under the EU Water Framework Directive.

4(e) This is a matter for the River Basin Management Plan, under the EU Water Framework Directive.

4(f) This is addressed in a number of actions relating to nature-based solutions. See item 4(a) above.

4(g) This is addressed in the Kilkenny City and County Development Plan 2021-2027 which underpins this Plan (see Section 10.2.8)

4(h) This is addressed in **Action 3.2** of the Plan.

		<p>5. Circular Economy and Litter Management</p> <p>5(a) Collaborate with local Social Enterprises to drive circular economy initiatives and generate fresh</p>	<p>4(i) This is addressed in Sections 9.2.7 and 9.2.8 of the Kilkenny City and County Development Plan 2021-2027 which underpins this Plan. In addition, Kilkenny County Council has completed a county wide audit of wetland sites. The recommendations of this audit will be addressed in the Kilkenny County Council Biodiversity Action Plan, to be prepared by the Biodiversity Office in 2024.</p> <p>4(j) This is a matter for the River Basin Management Plan, under the EU Water Framework Directive.</p> <p>4(k) This is a matter for the River Basin Management Plan, under the EU Water Framework Directive.</p> <p>4(l) This is a matter for the River Basin Management Plan, under the EU Water Framework Directive</p> <p>4(n) This is a matter for the River Basin Management Plan, under the EU Water Framework Directive. Action 4.12 in the Plan will also address this issue.</p> <p style="text-align: center;"><u>Actions relating to issues raised in</u> <u>“4. Flood Control and Water”</u></p> <p>Action 1.9: <i>Deliver Flood Relief Schemes under the Catchment and Flood Risk Assessment Management (CFRAM) Programme, and Minor Flood Mitigation Works, incorporating nature-based solutions, where possible, whilst having appropriate regard to environmental protection requirements associated with flood resilience development.</i></p> <p>Action 3.2: <i>Promote and facilitate tree, woodland and hedgerow protection, planting and management on public and private land whilst taking measures to promote the use of native species over non-natives and having due regard for</i></p>
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ideas, such as repurposing waste within the 'waste disposal' infrastructure.

5(b) Expand Civic Amenity sites to accommodate repair activities by entities like Men's Sheds or private businesses, refurbishing furniture and electrical appliances for resale.

5(c) Liaise with coffee shops to ban disposable coffee cups in Kilkenny City.

5(d) Offer Picker Pals courses in schools to promote litter picking.

5(e) Encourage shopping at local markets

5(f) Promote permanent swap schemes for clothes and other items to reduce waste.

5(g) Establish Kilkenny County Council as a sustainability leader by implementing visible changes to combat adverse climate change and reduce carbon footprint.

5(h) Compile a list of food cloud registered companies in the County.

5(i) Strengthen littering and waste bye-laws for better enforcement.

5(j) Provide clearer guidelines on recycling options for the public.

water quality and soil stability issues whilst undertaking the planning process.

Action 3.7: *Implement Nature-based Solutions and biodiversity enhancement in new Kilkenny County Council developments*

Action 3.8: *Implement Nature-based Solutions and biodiversity enhancement through the planning process*

Action 4.12: *Support climate action on farms through local authority policy and programmes*

5(a) It is proposed that **Action 5.5** is amended to include a reference to social enterprises as follows: "Support local businesses **and social enterprises** to optimise opportunities in the green tech and circular/green economy."

5(b) It is proposed to amend **Action 5.16** to include all civic amenity sites as follows: "Explore the potential to repurpose, upcycle and/or to use waste collected at **Dunmore Civic Amenity Sites, and other appropriate locations**, to generate new products and enterprises, having due regard to the need to comply with relevant provisions of the Waste Management Act".

5(c) Kilkenny County Council would welcome such an initiative in the Kilkenny City Decarbonisation Zone, and would support Kilkenny retailers in developing it.

5(d) The Litter Pickers programme, run by The Voice, is already running in schools in County Kilkenny and supported and funded by Kilkenny County Council. **Action 4.2** in the Plan supports this.

5(e) This is not a matter for this Plan.

5(f) **Action 4.9** in the Plan addresses this.

5(g) The Council is committed to demonstrating leadership as outlined Plans' Vision statement "*Our vision is that Kilkenny County Council will be a climate resilient organisation that inspires and supports the county's transition to a biodiversity rich, sustainable and climate neutral economy by 2050*"

5(h) This information is already available from food.cloud.ie.

5(i) This is a matter for the Litter Management Plan (LMP) 2024-2026 currently in preparation.

5(j) This is a matter for the Litter Management Plan (LMP) 2024-2026 currently in preparation.

**Actions relating to issues raised in
"5. Circular Economy and Litter Management"**

Action 4.2: *Support communities to deliver local climate and sustainability actions, through programmes such as Sustainable Energy Communities, Tidy Towns, GAA Green Clubs, Green Schools and Heritage in Schools, Heritage Week, National Biodiversity Week, Creative Ireland and Cruinnui na nOg.*

Action 4.9: *Empower communities, through the Library Service, to reduce consumption and waste by facilitating the borrowing of books, tools and other items; hosting repair and up/recycling*

		<p>6. Climate Justice</p> <p>6(a) Provide support to disproportionately affected vulnerable communities due to climate change.</p> <p>6(b) Implement actions to support individuals in poverty or marginalized groups with insulation, heating, or solar panels.</p>	<p><i>workshops; and providing makerspace technology (3D printers and sewing machines) to reuse and repurpose goods.</i></p> <p>6(a) Climate justice and a just transition approach to climate action underpin the Plan. A number of Objectives and Actions in the Plan address this including the following:</p> <p>Objective 4.1 <i>Support and empower communities to adapt to the impacts of climate change and facilitate local climate action through education and awareness initiatives, well-being, cultural and creative programmes and grants.</i></p> <p>Action 4.4: <i>Support climate awareness and resilience through the Healthy Ireland Programme.</i></p> <p>Action 4.5: <i>Provide a sustainable home energy information and awareness programme for local authority tenants.</i></p> <p>Action 4.13: <i>Provide information and advice to communities, businesses and other stakeholders to support local climate action, via Council networks.</i></p> <p>6(b) See item 6(a) above.</p> <p>7(a) Kilkenny County Council are fully committed to continue to provide services, facilities, buildings and infrastructure that everyone can use and is accessible to all, as outlined in the Kilkenny County Council Disability Inclusion Strategy (2023). This commitment underpins all of the Council’s plans and strategies.</p>
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		<p>7. Social Inclusion</p> <p>7(a) Align SUMP, LACAP, and DZ with the Local Authority Disability Strategy.</p> <p>7(b) Include a disability officer in working groups to ensure inclusive representation.</p> <p>7(c) Emphasize "Universal Design" across all aspects, not just architecture, including training courses, event planning, service provision, etc.</p> <p>7(d) Integrate the Disability Strategy 2023-2027 in the Plan</p> <p>7(e) Recommends that flood warning procedures address people with disabilities.</p> <p>7(f) Apply consistent policies regarding air quality monitoring and incident reporting for the public, not limited to County Council staff.</p> <p>7(g) Support businesses through LEO to implement inclusive measures</p> <p>7(h) Align planning and policy supports with Kilkenny County Council Disability Strategy</p> <p>7(i) Ensure accessibility of bottle banks for wheelchair and height accessibility and avoid the use of curbs</p> <p>7(j) List food cloud-registered companies.</p>	<p>7(b) This is addressed in the Kilkenny County Council Disability Inclusion Strategy (2023) which includes an action to appoint a new Access Officer.</p> <p>7(c) This is addressed in the Kilkenny County Council Disability Inclusion Strategy (2023).</p> <p>7(d) See 7(a) above</p> <p>7(e) Noted. This is addressed Kilkenny County Council Disability Inclusion Strategy (2023).</p> <p>7(f) These policies are in place</p> <p>7(g) The Kilkenny LEO Office continues to promote the national pathway to entrepreneurship for people with disabilities.</p> <p>7(h) Kilkenny County Council are fully committed to continue to provide services, facilities, buildings and infrastructure that everyone can use and is accessible to all, as outlined in the Kilkenny County Council Disability Inclusion Strategy (2023). This commitment underpins all of the Council's plans and strategies.</p> <p>7(i) Noted.</p> <p>7(j) Companies registered with Food Cloud are listed on the website food.cloud.ie</p> <p>8(a) This is a matter for Planning policy which is dealt with in the County Development Plan.</p> <p>8(b) This is a matter for the Kilkenny City and County Development Plan 2021-2027 which underpins this Plan. It is supported by the following actions in the Climate Action Plan:</p>
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8. Land Use and Planning

8(a) Consider allowing private individuals to build small, affordable dwellings, exploring the potential of 'Tiny Houses' as an alternative housing solution.

8(b) Encourage diverse community land uses, integrating housing with shops, post offices, banking, recycling centres, green spaces, walking/cycling paths, retirement communities, and healthcare centres to minimize driving and promote diversity.

8(c) Favour denser housing development to mitigate increased car use, delayed emergency responses, elderly isolation, and biodiversity loss

8(d) Retrofit existing buildings including schools and other essential services

Action 2.6: *Integrate transport and land-use planning to facilitate a reduction in transport demand.*

Action 2.7 *Reallocate urban space towards the sustainable movement of people, and placemaking having due regard to opportunities to promote nature-based solutions and environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, and cultural heritage. Prioritise roads and streets currently or likely to be used by public bus services. Work towards ensuring network options are developed between active travel options and public transport routes.*

8(c) Compact and sustainable development is a key priority of the Kilkenny City and County Development Plan 2021-207 which underpins this plan. It is supported by **Action 2.30** of this Plan as follows: *Deliver sustainable and compact development, having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity.*

8(d) The Council is responsible for retrofitting its' own buildings and facilities, and for supporting others to do the same. A number of actions in the Plan address this as follows: **Action 2.25:** *Undertake a programme of energy reduction, retrofitting, and onsite renewable measures on Local Authority buildings, facilities and social housing, having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity, and the need to appropriately protect and conserve protected structures.*

Action 2.35 *Deliver a retrofit programme for Kilkenny County Council Social Housing, having due regard to environmental sensitivities such as local human receptors, protected species,*

		<p>9. Biodiversity</p> <p>9(a) Implement measures to protect hedgerows and trees, recognizing agriculture's significant emissions contribution.</p> <p>9(b) Enforce strict penalties for unauthorized tree felling.</p> <p>9(c) Limit tree felling and maintain a record.</p> <p>9(d) Increase tree planting in urban areas to mitigate urban heat island effects.</p> <p>9(e) The Council to lead by example by managing public and residential green spaces in line with the All Ireland Pollinator Plan.</p> <p>9(f) Manage hedgerows as ecological corridors to preserve biodiversity and carbon storage.</p> <p>9(g) Ensure Council-led hedgerow trimming adheres strictly to Teagasc recommendations and report trimmed lengths annually.</p>	<p><i>European sites and biodiversity, and the need to appropriately protect and conserve protected structures.</i></p> <p>Action 4.10: Continue to collaborate with the South East Energy Agency to provide an online home energy information portal/programme.</p> <p>9. General comment. Many of the policy issues raised here are addressed in the Heritage Chapter (9) of the Kilkenny City and County Development Plan 2021-2027 which underpins this Plan.</p> <p>9(a) This is addressed in the Kilkenny City and County Development Plan 2021-2027 (See Section 9). It is supported by Action 3.2 of the Plan.</p> <p>9(b) This is addressed in Kilkenny City and County Development Plan 2021-2027 (See Section 9.2.5)</p> <p>9(c) This is a matter for the Department of Agriculture, Food and the Marine.</p> <p>9(d) This is addressed by Actions 3.1 and 3.2 in the Plan</p> <p>9(e) Kilkenny County Council is a signatory to the All-Ireland Pollinator Programme and is committed to undertaking pollinator measures in its service delivery. This is addressed in Action 3.4</p> <p>9(f) This is addressed in the Development Plan and in Action 3.2 of this Plan.</p> <p>9(g) see 9(f) above.</p>
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9(h) Report illegal hedgerow destruction to the NPWS and enforce corrective actions promptly.

9(i) Work with Government to introduce a licensing scheme for hedge trimming contractors, requiring completion of a trimming course for eligibility.

9(j) Create informational leaflets on hedgerow management for landowners and contractors.

9(k) Educate schools on hedge maintenance.

9(l) Encourage Tidy Towns committees to promote biodiversity e.g. pond development, wildflower gardens, and 'let the long-grass grow' projects.

9(m) Provide biodiversity training through ETB's.

9(n) Stop cutting rough areas used by wildlife and eliminate the use of weed killers by councils.

9(o) Encourage wild areas in gardens, vertical walls of plants, and utilize flat roofs for urban gardens

9(p) Promote wildflower mixes with native plants and encourage leaving more areas to go to seed, advocating for the acceptance of "messy gardens."

9(h) The Council will continue to liaise with NPWS in their responsibilities re same as provided for under the Wildlife (Amendment) Act 2000.

9(i). This is not a matter for this Plan.

9(j) This is a matter for the Kilkenny Biodiversity Plan to be prepared in 2024. Kilkenny County Council Biodiversity Office is currently creating guidance on this topic.

9(k) This is a matter for the Kilkenny Biodiversity Plan to be prepared in 2024. It is addressed through the Heritage in Schools Programme, and various educational programmes.

9(l) This is in hand through the Kilkenny Tidy Towns Forum, coordinated by the Kilkenny County Council Environmental Awareness Officer.

9(m) This is not the remit of Kilkenny County Council.

9(n) This is addressed in 9(e) above and Action 3.5.

9(o) This is addressed in **Action 3.6** of the Plan. It will also be addressed in the Kilkenny County Council Biodiversity Plan, which will be in development in 2024.

9(p) Kilkenny County Council follows advice from the All Ireland Pollinator Plan which discourages the use of wildflower seed mixes as they often contain non-native species. See <https://pollinators.ie/wildflower-seed/> for information. See also item 9(e) above.

Actions relating to issues raised in "9. Biodiversity"

Action 3.1: *Prepare a Tree Strategy and Policy for Kilkenny City to provide a long term vision for the management of public trees whilst taking measures to promote the use of native*

		<p>10. Heritage</p> <p>10(a) Utilize historical societies' knowledge of past changes and social impacts to facilitate focused talks in libraries.</p> <p>10(b) Prioritise renewing heritage sites over demolition to preserve cultural and historical significance.</p>	<p><i>species over non-natives and having due regard for water quality and soil stability issues whilst undertaking the planning process.</i></p> <p>Action 3.2: <i>“Promote and facilitate tree, woodland and hedgerow protection, planting and management on public and private land 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.”</i></p> <p>Action 3.4: <i>Deliver a Pollinator Programme to protect and enhance pollinator habitats on Council owned land and in the wider county, whilst taking measures to promote the use of native plant species over non-natives, as appropriate.</i></p> <p>Action 3.5: <i>Identify and utilise alternatives to herbicide use on Council land. Identify and utilise environmentally friendly alternatives to herbicide use on Council land.</i></p> <p>Action 3.6: <i>Identify, map and utilise local authority owned land for habitat enhancement/restoration and nature-based solutions, whilst taking measures to promote the use of native plant/animal species over non-natives, as appropriate.</i></p> <p>10(a) This is addressed in Action 4.3: <i>Work with communities to identify, map and record local cultural heritage sites / areas/ traditions/ practises where loss due to climate change is likely /inevitable.</i></p> <p>10(b) This is addressed in the Kilkenny City and County Development Plan 2021-2027 (See Section 9); and in the following actions in the Plan: Action 2.29: <i>Ensure best practise in energy efficiency retrofitting of traditional/heritage</i></p>
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10(c) Implement improved planning regulations and cohesive strategies to preserve Kilkenny's aesthetic and facilitate entry into UNESCO, ensuring medieval architectural preservation.

buildings.

Action 2.31: *Develop a planning policy which supports the re-use of existing buildings, having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity, and the need to appropriately protect and conserve protected structures.*

10(c) This is not a matter for the Plan. Policies for the protection of heritage are addressed in the Kilkenny City and County Development Plan 2021-2027 (See Section 9).

Recommendation

No Change to the Draft Plan.

4.0

Proposed Modifications to the Draft Plan

Proposed modifications to the text of the Draft Plan are identified by their location within the Draft Plan, i.e. Chapter 1 Introduction, Section 1.1.

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

Modifications may only be made where they are minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site.

For clarity, any minor modifications must not relate to, or constitute, new or additional actions or additional elements to any action of the Plan that would give rise to the need for further assessment of the significant effects on the environment or the integrity of a European site.

Furthermore, given the statutory timeframe of twelve (12) months within which the Plan had to be prepared, as set out in Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021, a material amendment public consultation phase is not provided for under the legislation.

A list of proposed modifications to the Draft Plan are set out in Appendix 4 of this report. The proposed modifications are non-material modifications arising from consideration of the submissions received during the statutory consultation period. The modifications are displayed as follows:

How the modifications is displayed	What this means
Crossed out	Text to be deleted
Normal text	Text to remain as it is
<u>Text in bold and underlined and in red</u>	<u>Text to be added to the Draft Plan</u>

4.1 Summary of the Chief Executive’s Recommendations for Proposed Modifications

Appendix 4 of this Report provides a list of the non-material modifications which have been proposed by the Chief Executive on foot of public consultation on the Draft Plan. The proposed modifications are listed under the relevant Chapter and Section of the Final Plan. The list should be read in conjunction with the full Chief Executive’s Report.

All proposed modifications have been subject to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) screening.

5.0 Conclusion

This Chief Executive's Report on the submissions received on the Draft Plan during public consultation, is hereby submitted to the Elected Members of Kilkenny County Council for their consideration.

As per Section 16(6) of the Climate Action and Low Carbon Development (Amendment) Act 2021, 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 Elected Members shall give approval for the Climate Action Plan, only after having determined that the Plan shall not adversely affect the integrity of a European Site(s) in line with SI477 (EU Birds and Natural Habitats) Regulations 2011, as amended.

In making the resolution, the Elected Members have been provided with the following for consideration:

- i. Chief Executive's Report on Submissions
- ii. Draft Climate Action Plan
- iii. Supporting documents including
 - Kilkenny Climate Change Risk Assessment
 - County Kilkenny Baseline Emissions Inventory
 - Kilkenny City Decarbonisation Zone Baseline Emissions Inventory
 - Kilkenny City Decarbonisation Zone Plan
- iv. SEA Determination
- v. AA Determination

5.1 Recommendation

Considering the Kilkenny County Council Draft Climate Action Plan 2024-2029, this Chief Executive's Report on Submissions, the Strategic Environmental Assessment and Appropriate Assessment Screening of the Chief Executive's recommendations, it is proposed that the Draft Action Plan be approved by the Elected Members in accordance with the recommendations of this Report.

Within 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.



Lar Power

Chief Executive, Kilkenny County Council

2nd Feb 2024

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

Submission No.	No. submissions	Name of Organisation/Person
Statutory Environmental Consultees		
KK-C235-LACAP-18	1	Department of Housing, Local Government and Heritage
KK-C235-LACAP-8	1	Environmental Protection Agency
KK-C235-LACAP-10	1	Department of Agriculture, Food and the Marine
KK-C235-LACAP-29	1	Department of Environment, Climate and Communications
Adjoining Local Authority		
KK-C235-LACAP-11	1	Waterford City and County Council
Government Departments and National Organisations		
KK-C235-LACAP-21	1	Inland Fisheries Ireland
KK-C235-LACAP-25	1	Uisce Eireann
KK-C235-LACAP-26	1	Local Authorities Water Programme (LAWPRO)
KK-C235-LACAP-28	1	Failte Ireland
KK-C235-LACAP-24	1	Health Service Executive (HSE)
-	1	Department of Transport
-	1	Climate Action Regional Office (CARO)
KK-C235-LACAP-30	1	Northern Ireland Environment Agency
Voluntary, Representative and Development Organisations		
KK-C235-LACAP-13	1	Kilkenny Public Participation Network (PPN)
KK-C325-LACAP-33	1	Irish Bioenergy Association
KK-C235-LACAP-2	1	National Federation of Group Water Schemes
KK-C235-LACAP-27	1	An Taisce, Kilkenny Association
KK-C235-LACAP-23	1	Kilkenny LEADER Partnership (KLP)
KK-C235-LACAP-19	1	An Taisce, Green Schools Travel
Community Groups and Individuals		
KK-C235-LACAP-12	1	Community Gardens Ireland
KK-C235-LACAP-15	1	Global Action Plan
KK-C235-LACAP-1	1	Sinead Marshall
KK-C235-LACAP-3 to KKC235-LACAP-7 & KK-C235-LACAP-9	5	Reg Cooper
KK-C235-LACAP-14	1	Candida Frith-Macdonald
KK-C235-LACAP-16 KK-C235-LACAP-17	2	Matias Poggini
KK-C235-LACAP-20	1	Martin Rochford
KK-C235-LACAP-22	1	Mary Rice
Total	32	

Appendix 2: Public Notice



DRAFT LOCAL AUTHORITY CLIMATE ACTION PLAN 2024 – 2029

Section 5 of the Climate Action and Low Carbon Development (Amendment) Act 2021

Kilkenny County Council has put its Draft Climate Action Plan out for public consultation. The Draft Kilkenny 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.

Public Consultation

A copy of the Draft Climate Action Plan and associated documents are available to view online at: <https://consult.kilkenny.ie/en/consultation/draft-kilkenny-county-council-climate-action-plan>

The Draft LACAP may be inspected during public opening hours from **Thursday 16th November 2023 until Wednesday 20th December 2023** inclusive, at the following locations:

- Environment Section, County Hall, Johns Street, Kilkenny, Co. Kilkenny Eircode R95 A39T
- Callan Library, Clonmel Road, Callan, Co. Kilkenny, R95 TW10

- Castlecomer Library, Kilkenny Street, Castlecomer, Co. Kilkenny, R95 AH33
- Kilkenny City Library, John's Quay, Co. Kilkenny, R95 YX65
- Ferrybank Library, Ferrybank Shopping Centre, Ferry Bank, Waterford, X91 D211
- Graiguenamanagh Library, Convent Road, Graiguenamanagh, Co. Kilkenny R95 V342
- Loughboy Library, Loughboy Shopping Centre Waterford Road, Co. Kilkenny, R95 TD71
- Thomastown Library, Marsh's Street Thomastown, Co. Kilkenny, R95 HP26
- Urlingford Library, The Courthouse, Urlingford, Co. Kilkenny, E41 A2X4

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 two ways:

1. Online via Kilkenny County Councils Consultation Portal at:
<https://consult.kilkenny.ie/en/consultation/draft-kilkenny-county-council-climate-action-plan>
- Or
2. In writing (marked "Draft Local Authority Climate Action Plan") to: Climate Action Coordinator, Kilkenny County Council, County Hall, John Street, Co. Kilkenny, R95 A39T

Submissions or observations must be made in writing no later than **16:00 on Wednesday 20th December 2023**. Late submissions will not be accepted.

Please consider the following when making your submission:

1. Submissions should be in **one** medium only i.e. online **or** hard copy
2. Submissions or observations should include your name and email address and, where relevant, details of any organisation, community group or company etc. you represent.
3. Children, or groups or associations representing the interests of children, are particularly encouraged to make submissions or observations.
4. 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 Plan.
5. Please ensure that no vexatious, libellous 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.
6. All submissions / observations will be subject to the Data Protection Act 1988 – 2018 and the Freedom of Information Act 2014
7. Submissions will be made available for public viewing on Kilkenny County Council's consultation website during the plan-making period. We will retain your data for no longer than is necessary for the purpose of this Plan and in accordance with Kilkenny County Council's Retention Policy and the relevant Data Protection legislation.

Public Information Drop-in Events

Council staff will be available during the hours of **10:30 to 13:00** to provide guidance on the Draft Climate Action Plan and on the consultation process, at the following locations. All are welcome to come along to:

Ferrybank Library Ferrybank Shopping Centre, Ferry Bank, Waterford, X91 D211	Tuesday, 21 st November
Castlecomer Library Kilkenny Street, Castlecomer, Co. Kilkenny, R95 AH33	Wednesday, 22 nd November
Kilkenny City Library John's Quay, Co. Kilkenny, R95 YX65	Thursday 23 rd November

A public webinar, hosted by Kilkenny Public Participation Network, will also be held on Wednesday, 22nd November at 19:00, [link here](#), please use the following Passcode: 432011

If you require more details, please contact the Environment and Climate Action Section at (056-7794350) or email climate@kilkennycoco.ie. You may also visit the Council Climate Action webpage at: <https://www.kilkennycoco.ie/eng/services/environment/climate-action/>

Signed: Sean McKeown, Director of Services, Environment and Climate Action

Date: 15/11/2023



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

Modifications to the Draft Local Authority Climate Action Plan 2024 – 2029 for the Kilkenny 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

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

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

The Modifications to the Draft LACAP have been made following a review of the issues raised during the prescribed public consultation period for the Draft LACAP from 16th November, 2023 to 20th December, 2023, and subsequent consideration by Kilkenny County Council.

The Draft LACAP has been informed by 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, Kilkenny County Council has concluded that the Modifications to the Draft LACAP will not give rise to likely significant effects on the environment.

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

- The modifications are only intended to provide clarification on existing Climate Actions defined in the Draft LACAP and make the LACAP more operative and focussed.
- The modifications 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 an Environmental Report 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.

Signed by:



Sean McKeown,

Director of Services

Date: 16th February 2024

**Modifications to the Draft Local Authority Climate Action Plan 2024 – 2029 for the
Kilkenny 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**

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

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

The Modifications to the Draft LACAP have been made following a review of the issues raised during the prescribed public consultation period for the Draft LACAP from 16th November, 2023 to 20th December, 2023 and subsequent consideration by Kilkenny County Council.

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

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

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

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

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

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

Signed by:



Sean McKeown

Director of Services

Date: 16th Feb 2024

Appendix 4:

Proposed Modifications to the Draft Kilkenny County Council Climate Action Plan 2024-2029				
No.	Section of Draft Plan	Page No.	Description of Proposed Modification	Reason
1	Section 1.8 Environmental Assessment	26	<p>Environmental Governance Principles (EGP's):</p> <p>EGP8 ‘Support opportunities to improve and restore ecological connectivity of non-designated habitats and sites (including watercourse connectivity) to improve overall ecosystem resilience and functioning while supporting climate action within the county.’</p> <p>EGP9 <i>‘Ensure local authority projects supported by plan actions have taken the necessary precautions to identify and manage invasive species, particularly with regard to Schedule III species. No local authority climate action related development project that is likely to cause the spread of invasive species listed in Schedule III shall be supported. All supported projects shall align with the goal of appropriately protecting, restoring and enhancing terrestrial and aquatic habitat and conditions to support the promotion of native species.’</i></p> <p>EGP10 <i>“Support opportunities to promote peatland restoration, rehabilitation and maintenance inclusive of biodiversity enhancement, while achieving climate targets through the implementation of the climate actions within the plan”.</i></p>	<p>To include specific references to the protection of fisheries and aquatic habitats in the Environmental Governance Principles which underpin and frame the actions in the Plan</p> <p>As per submission from Inland Fisheries Ireland (KK-235-LACAP-21)</p>
2	Section 2 Climate Policy	31	<p>Insert new Sub-Section:</p> <p><u>2.4 Local Policy</u> <u>The Kilkenny City and County Development Plan 2021–2027 sets out the spatial planning framework for County Kilkenny for a period of 6 years, with a framework and vision for how new development will occur across the county in both urban and rural areas. Key components of the County Development Plan are the settlement strategy, housing strategy and renewable energy strategy for the county.</u></p>	<p>To clarify the roles of the County Development Plan, and the Local Economic and Community Plan,</p> <p>And</p>

			<p><u>The Climate Action and Low Carbon Development (Amendment) Act 2021, includes a new provision in Section 10 of the Planning and Development Act 2000 (as amended) that stipulates that the Development Plan shall include provisions to “(ii) reduce anthropogenic greenhouse gas emissions and address the necessity of adaptation to climate change, taking account of the local authority climate action plan (within the meaning of section 14B of the Climate Action and Low Carbon Development Act 2015), where such a plan has been made for the area in question;”. In this respect, the County Development Plan and the Local Authority Climate Action Plan are consistent with each other and should be considered as part of the overall sustainable development framework for the county.</u></p> <p><u>The Kilkenny Local Economic and Community Plan 2023 – 2028 (LECP) sets out, for a six-year period, the objectives and actions needed to promote and support the economic development and the local and community development of County Kilkenny, both by itself directly and in partnership with other economic and community development stakeholders. The LECP ensures that Government and other stakeholders can work together to ensure that their initiatives, programmes and projects support an improved quality of life for people living and working in the county. The LECP and the Kilkenny County Council Climate Action Plan have been prepared with close consideration to each other, and the economic and community/social objectives of the LECP will be supported by the outward facing actions of the Kilkenny County Council Climate Action Plan as delivered through the Council services.</u></p>	<p>to note the alignment between them and the Local Authority Climate Action Plan</p> <p>As per submission from the HSE (KK-235-LACAP-24)</p>
3	Section 2.1 Climate Policy Context	28	<p>Figure 2.1: -Replace Figure 2.1 (Legislation and Policy Context for the Climate Action Plan) with an updated version of same, provided by CARO</p> <p>To be inserted at final publication stage.</p>	<p>Use updated version of Figure as provided by CARO.</p> <p>As per comments from CARO.</p>
4	Section 2.3 Climate Change Policy in Ireland	31	<p>Insert a new paragraph to Section 2.3: <u>“The Plan will remain aligned with high level plans and programmes, Guidelines, and legislation over its lifetime. Kilkenny County Council will consider any relevant updated actions, measures or recommendations that may arise in updates to the</u></p>	<p>To ensure alignment of Plan with new and emerging Plans and policies.</p>

			<u>National Climate Action Plan (or the National Planning Framework) over the lifetime of the Plan”.</u>	As per submission from the Environmental Protection Agency (KK-235-LACAP-8).
5	Section 3	35	<p>Figure 3.1 Profile of County Kilkenny: Correct data relating to the number of schools and population of the County</p> <p>-Schools 61<u>71</u> -Population 04,160 <u>104,160</u></p>	<p>To correct data.</p> <p>As per submission from An Taisce Green Schools Travel (KK-235-LACAP-19).</p>
6	Section 4.2 Climate Change Risk Assessment	46	<p>Current Climate Impacts: Additional graphics illustrating frequency of climate hazards in Co. Kilkenny over 30 years will be included in Section 4.2 of the Plan.</p> <p>To be inserted at final publication stage.</p>	<p>For the purposes of clarity.</p> <p>As per comments from CARO.</p>
7	Section 5.3	57	<p>Strategic Goals Strategic Themes will be re-named Strategic Goals.</p> <p>To be inserted at final publication stage.</p>	<p>To align with the Local Authority Climate Action Plan Guidelines (DECC, 2023)</p> <p>As per comments from CARO</p>
8	Section 5.4	58	<p>It is proposed to amend an error in the text as follows: “A total of 96 <u>95</u> actions were identified in the Plan (plus an additional four actions specific to the Kilkenny City DZ).”</p>	<p>To amend an error in the text.</p> <p>As per comments from CARO</p>
9	Section 5.5 Climate Actions	59	<p>Action No’s 1.14-1.19 Include Actions 1.14 to 1.19 in Table of Action 5.5.</p> <p><u>Action 1.14: Peer review planning policies regarding climate action.</u></p> <p><u>Action 1.15: Incorporate climate and sustainability best practise in Kilkenny County Council developments.</u></p> <p><u>Action 1.16: Review the Kilkenny County Council Development Contribution Scheme to assess the feasibility of incentivising low carbon development.</u></p> <p><u>Action 1.17: Develop and promote a Kilkenny Civil Defence Climate and Sustainability Policy.</u></p> <p><u>Action 1.18: Implement and promote a Kilkenny Fire and Rescue Service Climate and Sustainability Programme.</u></p>	<p>To amend the omission in the text.</p> <p>As per comments from CARO</p>

			<u>Action 1.19: Respond to new priorities and programmes that emerge over the lifetime of the Local Authority Climate Action Plan, having due regard to environmental sensitivities, biodiversity, European sites, human receptors, and the need to promote sustainable practices.</u>	
10	Section 5.5 Climate Actions	61	Action 2.26: <i>-Investigate the feasibility of local authority led/supported alternative heating systems and fuels including District Heating, and Geothermal, and Bioenergy".</i>	To include Bioenergy as potential alternative heating systems and fuel. As per submission from the Irish Bioenergy Association (KK-235-LACAP-33).
11	Section 5.5 Climate Actions	61	Action 2.27 <i>-<u>"To develop a policy on Disaster Risk Management and to undertake Climate Risk Assessments of Local Authority owned heritage assets"</u>.</i>	To address disaster risk management As per submission from Department of Housing, Local Government and Heritage (KK-235-LACAP-18).
12	Section 5.5 Climate Actions	63	Action 4.1: <i>-Support communities to deliver local climate and sustainability actions, through grant schemes and programmes such as Sustainable Energy Communities, Tidy Towns, GAA Green Clubs, Green Schools and Heritage in Schools, Heritage Week, Heritage Grants, National Biodiversity Week, Creative Ireland and Cruinnui na nOg."</i> <i>-Add an additional KPI to this action as follows: <u>"Number and value of heritage grants provided to support climate resilience and adaptation under the Community Monuments Fund, Built Heritage Investment Scheme, and Structures at Risk Scheme etc."</u></i>	To address resilience and adaptation of the built and archaeological heritage. As per submission from Department of Housing, Local Government and Heritage (KK-235-LACAP-18).
13	Section 5.5 Climate Actions	63	Action 4.4: <i>-"Support climate awareness and resilience through the Healthy Ireland Programmes, and other relevant health programmes".</i>	As per submission from the HSE (KK-235-LACAP-24)

			- Add the HSE as a Partner in the delivery of the action.	
14	Section 5.5 Climate Actions	64	Action 5.5: “Support local businesses and social enterprises to optimise opportunities in the green tech and circular/green economy.”	To recognise the potential contribution of social enterprises to the circular economy. As per submission from the PPN (KK235-LACAP-13).
15	Section 5.5 Climate Actions	64	Action 5.16: ““Explore the potential to repurpose, upcycle and/or to use waste collected at Dunmore Civic Amenity Sites, and other appropriate locations , to generate new products and enterprises, having due regard to the need to comply with relevant provisions of the Waste Management Act”.	To include additional potential locations as venues for repurposing, upcycling re-using waste. As per submission from the PPN (KK235-LACAP-13).
16	Section 5.5 Developing Actions	62	DZ Actions Actions DZ1-DZ4 will be omitted from the Table of Action Section 5.5. in the Final Plan, and remain only in Section 6.6.	To avoid duplication As per comments from CARO.
17	Section 5.5 Table of Actions	59- 64	Sustainable Development Goals (SDG’s): -Incorporate a modification to the Table of Actions to include a new column identifying the relevant United Nations Sustainable Development Goals (SDG’s) addressed by each action. To be inserted at final publication stage.	To clarify alignment of actions with the UN Sustainable Development Goals. As per comments from CARO, and submission from the HSE KK-235-LACAP-24.