



Comhairle Contae
Ros Comáin
Roscommon
County Council



Gníomhaíthe ar Son
na hAeráide Ros Comáin
Climate Action
Roscommon



Rialtas na hÉireann
Government of Ireland

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1. Introduction

The Climate (Amendment) Act 2021 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 Climate Action Plan, adopted for consultation by Roscommon County Council on 23rd October 2023, demonstrates a coherent approach to climate action across the administrative and political structure of the local authority.

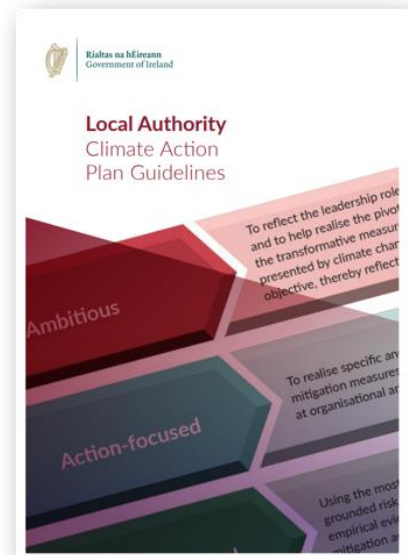
The Draft Climate Action Plan sets a clear pathway for Roscommon County Council to:

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

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

The Draft Plan sets out how Roscommon County Council will be responsible for enhancing climate resilience, increasing energy efficiency and reducing greenhouse gas emissions, across its own assets, services and infrastructure, to which it is 'fully accountable' for, whilst also demonstrating a broader role of 'influencing', 'coordinating and facilitating' and 'advocating' for other sectors, to meet their own climate targets and ambitions.

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



1.1 Context and Terms of Reference

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

The Draft Plan includes a range of actions across five thematic areas:

- Governance and Leadership
- Built Environment and Transport
- Natural Environment and Green Infrastructure
- Communities, Resilience and Transition
- Sustainability and Resource Management

Pursuant to Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021, notice of the preparation of the Roscommon County Draft Climate Action Plan 2024-2029, was given on 27th October 2023. Submissions or observations with regard to the Draft Plan and Environmental Reports (Strategic Environmental Assessment and Appropriate Assessment) were invited for a period of just over 6 weeks, from 27th October 2023 to 13th December 2023, inclusive.

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

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

This Chief Executive's Report on Submissions Received is hereby submitted to the Elected Members of the Local Authority, for their consideration. The Elected Members have up to 6 weeks to consider this Chief Executive's Report, in accordance with the requirements of the Climate (Amendment) Act 2021. Elected Members will be briefed in January 2024 to provide an overview of the Chief Executive's Report and Roscommon County Council 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 local authority Climate Action Plan by the Elected Members, the Council will publish the final plan. The Climate Action Plan shall have effect for a period of five years from the date on which it is approved by the Elected Members.

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

An Environmental Report accompanies the Draft Climate Action Plan. The Environmental Report contains a detailed analysis of the Draft Climate Action Plan and how the implementation of the Plan would impact on its receiving environment. The Chief Executive's recommendations as set out in this report (including recommendations on the Environmental Authorities submissions detailed in **Section 3.1.1**), have been assessed to determine whether they would have any significant impact on the environment.

Taking into account the mitigation measures 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 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.

Conclusions and determinations with regard to SEA/AA processes are contained at **Appendix C**.

2. Consultation and Engagement

2.1 Outline of the Consultation Process

In accordance with the provisions of Section 16 of the Climate (Amendment) Act 2021, the Draft Climate Action Plan underwent statutory public consultation, from 27th October to December 13th 2023, inclusive. In accordance with the statutory notice (**Appendix 1**), stakeholders were invited to make submissions during this period on the Draft LACAP and associated Strategic Environmental Assessment and Appropriate Assessment Report. Copies of this notice and means of access to documentation were issued to the Environmental Authorities, prescribed Authorities and adjoining Local Authorities as per the requirements of the Act.

Copies of the documents were provided to all council libraries and area offices in the county so that they could be accessed and read by members of the public and any other stakeholders. All documents were also made available online.

Advertisements, including the statutory notice, including access to relevant information on GDPR were placed in both local newspapers - The Roscommon People on October 27th and The Roscommon Herald on October 31st - in addition to the utilization of social media, internally on the council Intranet and on the Council's website which gave relevant details about the Draft CAP consultation.

A total of 23 submissions, including acknowledgements, were received during the consultation period, 18 of which constituted valid submissions and are included in this report for analysis, review and recommendation.

2.1.1 Key Elements of the Public Consultation Process

A series of public events were held during November and December to support the statutory consultation phase of the draft Plan, where the Climate Action Unit were available and at which copies of the Draft Action plan and associated documents were on view for attendees to review and where submissions and/or observations could be made.

Dedicated public consultation events were held at these locations:

- King House, Boyle on Tuesday 21st November.
- Monksland Community Centre, Monksland on Thursday 23rd November. This was a joint event with Roscommon LEADER and which also promoted energy awareness.
- Áras an Chontae, Roscommon on Friday 24th November.
- Trinity Arts Centre, Castlerea on Tuesday 28th November.

In addition to the public consultation events, the Climate Action Unit also attended the Comhairle Na nOg Annual Conference to promote the consultation and give general information on climate action. Climate Action Unit Officers also held a stand at the PPN

Plenary Session on November 29th at The Abbey Hotel to highlight the consultation phase and encourage submissions.

The Climate Action Unit were also present at Kilbride Community Centre on October 31st at The National Federation of Group Water Schemes conference where they promoted the Draft CAP public consultation and answered questions on climate related issues.

2.2 Engagement with Key Stakeholders and Young People

In addition to the attendance by the Climate Action Unit at the Comhairle Na nÓg Annual Conference, Roscommon County Council's Environmental and Awareness Officer made contact with local schools that were circulated with full details of how to access the Draft LACAP and invited to make submissions.

Climate Action Unit Officers also presented details of the Draft LACAP at the October meeting of the Economic Development SPC and the Local Community Development Committee meeting of 22nd November.

Also on November 29th, Officers from the Climate Action Unit hosted a meeting organized by CARO to present and discuss our Draft CAP with neighbouring County Council Climate Action Units and during which the neighbouring councils were able to present their own Draft LACAPs, which were discussed by those present.

Meetings were also held with the representatives from the following organisations over the consultation period:

- Sustainable Energy Authority of Ireland representatives,
- Teagasc,
- The Irish Farmers Association
- Roscommon Women's Network
- Rooskey and Roscommon Sustainable Energy Communities/Roscommon Transition Town,
- County Roscommon Men's Sheds,
- GAA Green Clubs
- Think-tank for Action on Social Change (TASC)
- Western Development Commission
- Irish bioenergy association

In addition to the joint consultation event held in Monksland Community Centre 23rd November, the Climate Action unit remained in contact throughout the process with Roscommon LEADER Partnership.

3. Summary of Submissions, Responses and Recommendations

During the consultation period, 18 valid submissions were received which are analysed in the following sections. The report takes the following format to address issues raised in each submission:

- Outline/summary of submission received
- CE response to Submission and Recommendation
- Proposed Amendments to Draft Plan

All proposed amendments are then outlined by the relevant section in the Draft Climate Action Plan table at **Section 3.4**.

3.1 Submissions from Prescribed Environmental Authorities

3.1.1 Environmental Protection Agency

Submission received 27/10/23

Submission Summary

- The submission, acknowledges notice received and outlines the statutory role of the EPA with regard to the LACAP and links the submission to the previous correspondence with regard to SEA scoping stage. The submission acknowledges the alignment of the LACAP with national policy objectives.
- The submission sets out the need for adequate monitoring and reporting networks and that these are maintained fit for purpose to facilitate future forecasting at local and national levels and provide a robust adaptation response.
- The report on "climate change in the Irish Mind" should be considered.
- Implementation monitoring should be included as a specific action
- The SEA should help identify potential co-benefits for quality of life and environmental integrity
- With regard to the Environmental Report, the non-technical summary should include the relevant information required under Sch.2 of S.I. no. 434 of 2004 as amended
- The plan should include a commitment to remain aligned with high-level plans, programmes, guidelines and legislation over its lifetime, in particular with the national climate action plan, national planning framework, RSES's.
- Strategic Environmental Objectives should be specific to facilitate targeted monitoring and mitigation
- Mitigation for potential significant environmental effects should include clear commitments for implementation
- The monitoring programme should be flexible to allow for unforeseen adverse impacts, address cumulative effects and address both positive and negative impacts.
- Monitoring should set out data sources, timelines and responsibilities.
- Where adverse effects are identified during implementation, suitable remedial action should be taken.
- Required contents of the SEA statement shall be outlined on adoption of the plan
- Screening of future amendments to the Draft LACAP should take place for likely significant environmental effects

CE Response and Recommendations

- The report "Climate change in the Irish Mind" has been addressed at Section 2 of the Draft LACAP

- Implementation monitoring is included in **Action GL5** and will incorporate specific KPIs as agreed with DECC and CARO
- Incorporate alignment with high-level plans into **Action GL1**
- Future amendments to the LACAP will be subject to the requirements of SEA/AA legislation.

Proposed Amendment to Draft

No.	Action	Objectives	Lead	Partners	Timeframe
GL I	Prepare and adopt Roscommon County Climate Action Plan in accordance with obligations and to highlight organisational commitment to carbon neutral transition, to periodically review actions <u>to ensure alignment with higher order plans</u> , in line with emerging findings on future climate impacts and new technologies and ensure that relevant findings at local level are fed upwards into national level policy and decision-making	GL (i), (ii) & (viii)	Climate Action Unit	All govt. departments, Sectors, elected members, community, CARO	Q1 2024, Q1 2026, as required

3.1.2 Department of the Environment, Climate and Communications

The submission was received 13/11/23-

Submission Summary

The submission acknowledges the receipt of the Draft LACAP and sets out the requirements in relation to same, including compliance with the relevant legislation, higher-order plans and guidelines.

The Service level agreement between the department and the LA is outlined including financial support to develop climate action teams, training Programme and the relationship with the CARO's.

CE Response and Recommendation

The submission is welcomed and acknowledged. No amendments to the Draft are proposed as a result.

3.1.3 Department of Housing, Local Government and Heritage

Three submissions were received from this department, 27/10/23, 02/11/23 and 12/12/23 which are the same in content

Submission Summary

- Refers to the adaptation strategy as opposed to the Draft LACAP.
- It outlines that the climate change sectoral adaptation plan for built and archaeological heritage and identifies priority impacts based on current climate change projections.
- It further outlines initiatives to ensure alignment across local regional and national levels.
- It sets out a number of risk reduction strategies that should be included in an adaptation document and guidance to be published on energy efficiency in public buildings.
- It further sets out that heritage related roles should be included as part of Climate Action Steering groups.

CE Response and Recommendation

The submission is welcomed and acknowledged.

- Skills Capacity within the Council to address climate related issues are addressed at **Actions GL4, GL 6-8, BET 7, BET9, NEGI 4, NEGI 7-8, NEGI 10, CRT 2 and DZ3**

- Sensitive retrofitting of heritage structures is addressed at **Actions NEGI 2, NEGI 4 and NEGI 7.**
- Relevant officers, including Heritage, form part of the Climate Action Team that will oversee plan implementation.

No amendments to the Draft are proposed arising from this submission.

3.1.4 Department of Agriculture, Food and the Marine

Submission received 12/12/23

Submission Summary

- Refers to SEA Scoping Report
- Deals with Marine area and Seafood Fisheries.

CE Response and Recommendation

The DAFM submission is acknowledged. County Roscommon does not have a coastline and as such, no amendments are proposed to the Draft LACAP.

3.2 Submissions from Adjoining Local Authorities

No submissions were received from Adjoining Local Authorities

3.3 Submissions from other Government Departments and Semi-State bodies

3.3.1 Department of Transport

Submission received 13/12/23

Submission Summary

- Outlines the role of appropriate spatial and land-use planning considerations and the delivery of infrastructure in promoting modal shift in the following ways:
 - Decarbonisation of LA fleet
 - Development of EV charging infrastructure
 - Co-location of shared mobility services
 - Delivery of active travel programmes, enhancing public realm and ensuring new developments are designed to facilitate sustainable travel modes
 - Support and advocate behavioural change
- Outlines analyses and reports to achieve CAP transport related actions
- Identification and implementation of road space reallocation opportunities, pedestrian and cycling enhancement plan and demand management measures
- Reference should be made to centrally provided supports
- Refers to Local Authority responsibilities outlined in department guidelines on the preparation of LACAP with regard to Public Engagement and smart and sustainable mobility workshops
- Outlines five priority areas in relation to demand Management, Parking policy, air quality and sustainable mobility – 15 minute neighbourhoods, enhanced delivery of National Planning Framework, Healthy Streets Assessments, on-street parking controls and pricing/mileage-based vehicle taxation
- Active Travel infrastructure – refers to forthcoming strategies on cycling
- Reference to road space reallocation, DMURS, accessibility and Public realm
- Integrated Land-Use and Transport Planning
- Climate Adaptation measures and the sectoral adaptation plan

CE Response and Recommendation

The Department of transport submission is welcomed. The recommendations contained within the submission are incorporated within the Actions outlined in the plan.

3.4 Other Submissions

3.4.1 Cllr Orla Leyden

Submission received 11/12/23

Submission Summary

- Under nature based actions – ban pesticides other than targeted use on invasive species in the absence of alternatives similar to other Local Authorities
- Planting of native trees and food forests on public lands, supporting communities to grow food
- Support development of sustainable community based food production and seed-sharing communities
- Under resource management – develop a regional circular economy and community garden co-located with community space and national tapestry centre at Edenville house and Roscommon military barracks to build on links made with rediscovery centre, promoting community engagement and education to promote local transition from a consumer to circular economy and enhance visitor experience – heritage building/climate action initiatives close to public transport. Progress this project with a range of Local groups and the community, secure lease.
- Other Measures – Greater use of Solar in public Buildings and social Housing, geothermal energy and Hydro, rainwater harvesting
- Appointment of Biodiversity Officer
- Embed Just Transition principles in the plan.

CE Response and Recommendation

- RCC, in conjunction with Waterways Ireland, Kildare, Westmeath, Fingal, Kilkenny, Meath, Offaly, South Dublin and Tipperary County, and Cork and Galway City Councils, commissioned a set of guidelines for increasing biodiversity and alternatives to herbicides in public open spaces, prepared by Maynooth University and Trinity College Dublin in association with Teagasc and the national biodiversity centre. These guidelines outline standards, best practice and necessary training in the use of herbicides and pesticides. **Action NEGI 10** states that these guidelines will be implemented in local authority operations and be disseminated to the public and local community, including training to prevent adverse environmental effects, and that this will be developed and delivered by a competent ecological team. This will include aiming to eliminate and avoid the use of glyphosate based products.
- **Actions NEGI 8** and **DZ 6** relate to the implementation of a tree management strategy to increase appropriate canopy cover within the county, including training and education on biodiversity enhancement and training for council staff, contractors and communities in support of this aim.
- **Action CRT 5** supports communities in the development of nature-based solutions in line with a green infrastructure strategy. It is recommended **Section 2.4** of the plan includes reference to community work to date in the area of seed-saving and community gardens and that **Action CRT 5** is amended to include provision for locally grown food to enhance food security and strengthen the just transition process.
- **Actions SRM 1, DZ 1** and **DZ 2** support the development of circular economic activities within the County and Roscommon Town area. In the absence of a detailed appraisal, costings and a definitive funding source, along with the required permits and assessments associated with the redevelopment of a heritage building, it is not possible for RCC to commit to the specific use of Edenville house for this purpose within the constraints of a five-year statutory plan. RCC are committed to supporting the circular economy and, in particular, community based initiatives of significant socio-economic as well as environmental benefit. It is therefore recommended that **Actions SRM 1** and **DZ 2** are strengthened to provide support to communities as appropriate, to progress, develop and/or expand circular economic activities.

- **Actions BET 1, 2, 6, CRT 2, DZ 8, 9, 10 & 16** address application of sustainable and renewable technologies throughout RCC building stock and the wider County area.
- The process of engaging a Biodiversity Officer for RCC is underway
- The principles of Just Transition are reflected throughout the plan and specifically in **Actions CRT 7 & 8**

Proposed Amendments to Draft

- Include paragraph on Strokestown seed savers and food hub/gardening club at **Section 2.4**

No.	Action	Objectives	Lead	Partners	Timeframe
CRT 5	Support communities in the development of nature-based solutions in line with green infrastructure strategy and source protection guidance in place. <u>RCC will collaborate with communities to strengthen local food security and promote equity and well-being through support for community gardens allotments as appropriate.</u>	CRT (iii) & (v)	Roads and Transportation	LAWPRO, EPA, NPWS, OPW, 3rd level institutions, community groups, town teams, SECs	Q4 2025
SRM 1	Establish links between community organisations at a local level to develop opportunities in the area of waste reduction, reuse and recycling, <u>provide support as appropriate, to progress, develop and/or expand circular economic activities</u>	SRM (i), (ii) & (iii)	Environment	Community, RLP, EPA DECC	Q4 2024
DZ 2	RCC will embrace its lead role in minimising waste and embracing circular economy principles and to leverage influence over resident's behaviours and attitude towards waste and to build capacity in the local and business community to support waste minimisation and the circular economy in Roscommon town <u>and provide support as appropriate, to progress, develop and/or expand circular economic activities</u>		Climate Action Unit	Roscommon Transition Town, Chamber of Commerce, Roscommon Women's Network, SEAI, REPAK, LEADER, 3rd Level, Rediscovery centre, community	Q4 2024
NEGI 10	Implement the <i>sustainable management practices for public open spaces report and guidelines</i> with the aim of advocating for the elimination and avoidance of glyphosate-based products in local authority operations and promote education and awareness on the use of herbicides and pesticides to the public and local communities to protect biodiversity and water quality. Training regarding herbicides and pesticides promotes use that does not cause significant effects on the receiving water environment, biodiversity or European sites Highlight danger of invasive species and develop internal and external educational resources on prevention and biodiversity-aware eradication. Ensure that the invasive species educational resource is developed by a competent ecology team.	NEGI (i), (v), (vi), (vii) & (viii)	Climate Action Unit	Maynooth University, DECC, DAFM, IFA, community, Uisce Eireann, NPWS, LAWPRO, National federation of group water schemes	Q2 2024

3.4.2 Community Gardens Ireland

Submission received 10/12/23

Submission Summary

- Voluntary organisation to promote environmental awareness, supporting communities in gardening and food growing
- Advocating for improvement in national policy and legislation on community gardens and allotments – presenting to oireachtas committee, citizens assembly on biodiversity loss and climate action plan on need to provide for encouragement of public to grow more food and green spaces in cities and urban areas
- Draft LACAP makes no reference to allotments or community gardens
- Recommends that –
 - RCC should commit to supporting Allotments and community gardens
 - Review underused land within the county that could be used for growing purposes
 - Survey local residents for interest in allotments and community gardens
 - Commit to opening and supporting a seed library
 - Recognise and celebrate role of community growing for national allotments and community gardens week.
- Attached to submission – references to Scottish government publications on reductions in GHG emission from community gardening, IPCC reports on community growing spaces, WHO recommendations for public green spaces and the Community Gardens Ireland Submission to the 2023 CAP.

CE Response and Recommendation

RCC supports sustainable, community-based food growing in appropriate areas and recommends the following amendment to **Action CRT 5**

Proposed modification of **Action CRT 5**

CRT 5	Support communities in the development of nature-based solutions in line with green infrastructure strategy and source protection guidance in place. <u>RCC will collaborate with communities to strengthen local food security and promote equity and well-being through support for community gardens allotments as appropriate.</u>	CRT (iii) & (v)	Roads and Transportation	LAWPRO, EPA, NPWS, OPW, 3rd level institutions, community groups, town teams, SECs	Q4 2025
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3.4.3 Renewable Gas Forum Ireland

Submission received 21/11/23

Submission Summary

- Outlines requirement for LAs to accommodate agri-based biomethane production to support national CAP decarbonisation targets through LACAP and other functions including County Development Plans.
- Recommendations include:
- Potential contribution to Environmental governance principles –
- EG1, EG2 & EG6 – digestate biofertiliser from agri-based biomethane can replace artificial fertilisers, improve soil structure, sequester carbon and reduce run-off, protecting water quality
- Potential contribution to other actions –
- CRT 1 – CRT4 & CRT & - development of Biomethane production and green biorefineries supports communities to achieve climate action in terms of renewable energy development, waste management and the circular economy, opportunities for innovation, research and capacity building, supports a range of businesses, should be included in grant opportunities and can form part of the Just transition process.
- Addresses Objectives SRM (i) & (iii) and supports actions SRM 2 & SRM 3, DZ 18.
- Recommends:
 - That the role of agri-based biomethane is understood and embedded across RCC functions, in particular larger scale, on-farm, agri-feedstock based systems.
 - County level plans should provide for a range of projects at different scales and ownership models
 - Should be listed amongst renewable energy, rural enterprise/job creation opportunities, and should be supported
 - Communities should be empowered through local carbon planning and local energy production in collaboration with RGFI and Community power
 - Investigation and application of biomethane for district heating
 - GNI should be included as key infrastructural stakeholder – potential for use of grid for renewable gas
 - Biomethane potential to address local energy security, storage and price stability
 - RGFI welcomes further engagement and collaboration with RCC
 - Lists benefits of Agri-based biomethane sector and relevance to RCC functions

CE Response and Recommendation

The potential for the sustainable development of agri-based biomethane is acknowledged and supported in **Actions NEGI 6, CRT 1 – 3, CRT 7-8, SRM 2**. No further amendments are proposed to the Draft in this regard.

3.4.4 Cllr Pascal Fitzmaurice

Submission received 11/12/23

Submission Summary

- This submission calls on RCC to study the feasibility of geothermal energy district heating systems throughout county Roscommon. Opportunities exist in Roscommon Town linking government buildings, schools, housing and the swimming pool. A smaller system could be investigated to other towns to reduce costs and use of fossil fuels to combat climate change.

Information attached on GSI studies in relation to geothermal energy

CE Response and Recommendation

Potential to investigate alternative sustainable heating sources including district heating is included in **Actions GL 1, BET 1, BET 4, NEGI 6, CRT 2, CRT 8, DZ 8 – 10** and **DZ 16**. It is recommended that **Action DZ 16** is amended to include reference to geothermal potential.

Proposed Amendment to draft

16	Initiate a study on the potential for alternative heat sources, including Geothermal potential , within the Roscommon Town DZ area for residential, commercial, community and public sector/institutional application	Climate Action Unit	Completion of study and implementation of recommendations	Housing, ESB, GNI, DECC	Q4 2025
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3.4.5 Anonymous Submission I

Submission received 04/12/23

Summary of Submission

Outlines the importance of hedgerows in cultural heritage and as carbon sinks, wildlife corridors and biodiversity reservoirs, and that a significant portion of these are being destroyed annually. Public and private landowners should adhere to restrictions on cutting and burning as set out in the Wildlife Act 1076.

Hedgerows removed as part of planning approvals should be replaced with native species.

CE Response and Recommendation

The issues raised in this submission will be addressed through the implementation of **Actions GL 4, BET 5, NEGI 1-2, NEGI 4, NEGI 9-10** and **CRT 5** that deal with tree management, promotion of nature based solutions and the development and implementation of a green infrastructure strategy.

No further amendments are proposed to the draft LACAP in this regard.

3.4.6 Anonymous Submission 2

Submission received 20/11/23

Submission Summary

- Raises issues in relation to the accuracy of baseline calculations on rainfall in summer at Chapter 3
- GHG emissions caused by building (disturbance of soil, removal of trees, manufacture of concrete and use of diesel machinery) are not incorporated into baseline – should be recalculated
- Heavier rainfall will require maintenance of drains – chemicals and machinery should not be used to prevent environmental damage
- Source protection – should include the banning of pesticides and herbicides and slurry spreading and replacement with organic solutions and manual labour to protect water quality.
- Fly tipping and roadside litter need to be managed more effectively – mown verges with debris contribute to micro-plastic pollution that infiltrates water systems.
- Climate action videos are of no practical use and are a waste of time and money
- RCC s needs to commit to retrofitting all its buildings to a high standard with suitable, sustainable materials
- Offices should be arranged to make best use of daylight and staff trained to be energy efficient in use of heating and lighting and to promote health
- Car and travel allowances should be cancelled and use of sustainable transport modes rewarded. Work journeys on public transport should be free and facilitated through more frequent buses with more destinations and more stops
- With reference to 3.2.2. – forestry does not cause emissions
- BET (iv) Tourism emissions should not be encouraged – local goods and services for local communities should be prioritised and subsidised instead. Regulatory provisions for governing companies should be tailored to scale (international, local)
- BET 3A Energy use –retrofit existing buildings, promote behavioural change (warmer clothes, turn heating down etc.) a greenhouse should be installed on the roof of the greenhouse to capture energy and use as a municipal food centre – capture heat loss from the offices below and provide insulation
- BET 7&8 - Electric vehicles emit carbon in materials, manufacture and distribution. Renewable energy is not yet sufficient to address national needs therefore EVs cause carbon emissions and as such is better to service and repair exiting vehicles in RCC fleet and maintain as long as possible.
- BET 12 – old mental hospital in Ballinasloe should be renovated or sold to make apartments if carefully renovated and insulated.
- NEGI 8 – relevant training should be provided to those cutting hedges in best practice to protect wildlife and promote biodiversity
- Decarbonisation zone – Active travel (including cycle lanes) should be tailored to needs, connecting people with work, school, childcare, healthcare etc.
- A commercial composter should be provided in the amenity area (misleading term – should be waste management) to take suitable compostable plastic wastes.
- Agricultural practices should not use chemical fertilizers, herbicides or pesticides.
- The use of biodigesters should be investigated to address waste and generate energy at individual, commercial or municipal level
- Travel – walking/cycling should be first choice for travel within Roscommon town once it is made safe. Buses should be provided from country areas into the town. Local link does not run in the evenings or stop on request, no taxi-bus available. Legislation should be altered to allow Uber style car-sharing

- The GSI should be involved in finding the solution to Lough Funshinagh
- Solid commitments should be made in the final plan – outline what the council will do and the steps needed to achieve it. Plan is too long, repetitive and not commitments made.

CE Response and Recommendation

- Baseline emissions inventories for the County and DZ area have been prepared in accordance with the Local Authority Climate Action Plan Guidelines, Technical Annex C – Climate Mitigation Assessment: Baseline Energy Inventory issued by the Department of Environment, Climate and Communications.
- Sustainable flood resilience/maintenance has been addressed at **Actions BET 5, NEGI 1- 2, NEGI 4 & 10**
- Source protection and the use of chemicals are addressed at **Actions NEGI 9 & 10**
- Raising awareness of the importance of Climate issues is essential to promote behavioural change and affect buy-in for sustainable future practices in support of Climate Action and biodiversity enhancement. Community videos produced clearly illustrated the high level of concern on environmental issues at a local level and a willingness to act to arrest climate and biodiversity breakdown. This shows that positive climate action is possible and achievable at community level and considered an important and worthwhile component of Climate Action in County Roscommon and is further supported by **Action GL 6**.
- RCC commits to energy efficiency measures and retrofitting its building stock at **Actions BET 1 & 2 and DZ 10**.
- Car and travel allowances are set at a national rather than local level. The development of a Staff Mobility Strategy in support of sustainable travel is set out at **Action BET 9**.
- LULUCF (land use, land use change and forestry) emissions calculation methodology is set out in accordance with national and international guidance.
- The potential for sustainable tourism to re-energise rural communities, particularly those affected by the just transition process, is recognised at an international level. The EU Just transition Fund has a specific strand relating to the development regenerative tourism in association with Fáilte Ireland that is currently being rolled out in the JTF area, of which County Roscommon forms part.
- Fleet management and composition will be aligned with national policy as per **Action BET 7**.
- **Action BET 12** the building referenced is not located in County Roscommon, however, this action will include the investigation of the sustainable development potential of derelict/underused sites
- **Action NEGI 8** will incorporate management and maintenance training to preserve and enhance biodiversity and wildlife
- **Action DZ 12 and 13** addresses initiatives to promote a pedestrian focussed town centre in association with public and private transport providers
- **Action DZ 15** will take a holistic view of waste management in the DZ area
- Geological Survey Ireland are engaged with RCC in addressing issues at Lough Funshinagh
- The LACAP is a statutory document that will remain in place for a five-year period. In this regard, RCC have been mindful in the development of specific actions to ensure that these are achievable within this time period and are broad enough to cater for potential opportunities, new technologies and associated funding streams that may arise over this timeframe. Implementation and monitoring provisions, including specific KPIs being developed in association with DECC and the CAROs, will ensure that progress is recorded and measured for each action and publicly available as part of the tracking mechanism to be developed under **Action GL 5**.

No further amendments are proposed to the draft in this regard.

3.4.7 Sean Butler, Hillside Holistic Farm

Submission Summary

- Roscommon – rural County – climate action plan should be working with farmers to reduce emissions

- Misleading information on farmers – demonised for biodiversity loss, air and water quality damage etc – linked to modern industrial/chemical operations and not regenerative/Organic. Problem is not with farmers but with what some elements are doing.
- Farmers manage most of the land in the county – can significantly contribute to reversing problems that exist with appropriate land management. Targets cannot be reached if farming practices are not changed rapidly
- Working with nature, farmers and scientists have explore and developed new farming methods to reduce and reverse environmental damage and enhance and regenerate ecosystems etc – regenerative agriculture/farming.
- RCC should get involved in educating on regenerative farming methods

CE Response and Recommendation

The position of farmers as custodians of the landscape and the potential to collaborate in mobilising climate action initiatives is recognised throughout this LACAP and, in particular at **Actions NEGI 6-7, NEGI 9, CRT 1, CRT 8, SRM 2** and **DZ 18**. RCC, in association with the National Federation of Group Water Schemes will continue to work with the agricultural community in areas such as the source protection scheme that promotes biodiversity in agriculture and has resulted in an associated international award-winning project in relation to beekeeping.

Proposed Amendment to draft

It is recommended that Section 2.4 Climate action in the Community is amended to recognise the contribution of the agricultural community to climate action efforts and the potential to continue this into the future

3.4.8 Roscommon Transition Towns Group

Submission received 13/12/23

Submission Summary

- Roscommon Transition towns welcome the opportunity to contribute to the LACAP process
- General comments – high level nature of document makes feedback difficult, refers to compliance with existing plans and lacks detail on how this will be done – don't allow for clear measurable impacts at local level.
- Lack of actions linked to agriculture – engaging with and promoting insufficient given the climate impact of agriculture – should have more specific details on carbon reduction, biodiversity enhancement, local supply chains and links with existing schemes.
- The concept of justice should be embedded throughout the plan in the context of transition to a carbon neutral economy
- Poor community engagement and insufficient participation processes in the development of the draft, not in line with DRCD guidelines.
- Community level actions focus on volunteers with limited capacity – this is unsustainable and requires administrative support/access to funding
- Introduction does not explain alignment of local and national attitudes and emphasises individual responsibilities rather than supports
- Plan does not respond to potential population growth and diversity and the supports necessary to sustain this
- "considerable challenges in the mobilisation and delivery of climate action" should be further defined
- Critical to find a way to engage with marginalised and vulnerable communities – not clear how the consultation process has engaged these sectors to date
- Governance and leadership – "Community" lead, training timescale, specific examples of green procurement
- Built Environment and transport – funding should be flexible to allow for groups to hire required administration and capacity building
 - BET 2 – vital services back-ups required –off grid facilities for each village/area
 - BET 4 – Volunteer based community groups need range of supports to deliver projects over and above "promotion"
 - BET 5 – Clarity need on nature based solutions and biodiversity enhancement measures and their purpose
- Green infrastructure strategy – who will design, deliver, monitor and provide training on this?
- How will this impact on the current regime of road works and what will be priority areas /actions within specific projects?
 - BET 6 – Will rainwater harvesting be utilised within public buildings – these should be able to function in times of emergency in time of climate crisis
 - BET 11 - Need for public transport to align locally and make logical and effective connections with rural areas. Walking and cycle routes should connect to demand areas and make sustainable modes realistic alternatives to the private car.
 - BET 12 – Nature based solutions/SUDs should be utilised in public realm improvements
 - BET 13 – support required beyond showcasing and encouraging
- Natural Environment and Green Infrastructure
 - Habitat restoration should be prioritised
 - NEGI iii – funding required for conservation and restoration of historic buildings
 - NEGI v - a system should be put in place to allow appropriate utilisation of heritage resources by the public
 - NEGI vi – green infrastructure necessary along with maintenance/enhancement/augmentation of existing

- Community resilience and transition
 - CRT 2 – could be clearer - identify stakeholders and partnerships and metrics around effectiveness
 - CRT 3 - clarify the nature of business initiatives proposed, how these are identified
 - CRT 4 – all grant funding should have climate action criteria attached- “promoting” projects not measurable
 - CRT 7 – affected communities should be listed here – how will these be identified/engaged? Process needs realistic timeframe and evaluation of effectiveness and impact
- Sustainable resource management
 - SRM 2 Range of organisations and schemes supporting farming communities to reduce emissions – what is role of RCC in this and how can they add value?
 - SRM 3 – Campaigns highlight supports available to facilitate behavioural change
 - SRM 4 – Welcomes EV charging facilities – additional options should be considered such as electric car sharing and electric bikes available to the community at affordable rates
- Decarbonisation zone
 - Needs to specify cycle network in Roscommon town – specific need to emphasise reduction in car traffic
 - Specific need to accommodate existing circular economic activity in Athleague – utilisation of Edenville House as a multi-purpose venue for Roscommon Women's Network and an education centre, presentation demo space for sustainable activities.
 - RCC should invest in charging infrastructure to make it more competitive with fossil fuel stations
 - Questions engagement with RePak as a lobby group and generator of packaging
 - Welcomes register of homeowners for retrofit projects

CE Response and Recommendation

RCC welcomes this detailed submission and appreciates the time and care taken in its preparation.

- With regard to the high level nature of the document, the LACAP is a statutory document that will remain in place for a five-year period. In this regard, RCC have been mindful in the development of specific actions to ensure that these are achievable within this time period and are broad enough to cater for potential opportunities, new technologies and associated funding streams that may arise over this timeframe. Implementation and monitoring provisions, including specific KPIs being developed in association with DECC and the CAROs, will ensure that progress is recorded and measured for each action and publicly available as part of the tracking mechanism to be developed under **Action GL 5**.
- The position of farmers as custodians of the landscape and the potential to collaborate in mobilising climate action initiatives is recognised throughout this LACAP and, in particular at **Actions NEGI 6-7, NEGI 9, CRT 1, CRT 8, SRM 2** and **DZ 18**. Forthcoming national strategies, such as that relating to biomethane, may provide opportunities for collaboration on specific project development in the agri-area. The relationship with existing agri-environmental schemes should be recognised and **Action SRM 2** amended accordingly.
- The concepts of Just Transition / climate justice are embedded throughout the plan and in particular at **Actions CRT 7-8**.
- RCC set out a detailed programme of consultation at the pre-draft and draft phases of the LACAP (as set out in **Section 2**), where it endeavoured to work through existing established networks including the PPN, Comhairle na nÓg, Roscommon Leader partnership and Women's network and the Local Community and Development Committee to reach the widest possible audience within the statutorily restricted timeframe.
- RCC acknowledges the time and effort expended by local volunteers and community committees in support of targeted local actions. In order to secure funding, these groups must be able to

illustrate a basic level of governance at a minimum, which, it is acknowledged, may be difficult for volunteer organisations. RCC recommends that those intending to constitute a local group for the purpose of accessing supports on climate action, contact RCC for advice on constitution and governance in advance.

- Decarbonisation is one element of the overall response proposed as part of the Draft Plan – Actions have been developed to provide a holistic response to the climate and biodiversity crisis through a mix of adaptation and mitigation measures. Mitigation in the form of decarbonisation is addressed as required as per national binding targets, however, the plan also incorporates carbon sequestration in the form of tree canopy cover enhancement and with reference to agricultural and land management practices. Adaptation measures in the form of biodiversity enhancement through the application of nature-based solutions are also included, as are measures to focus on those most vulnerable to the transition process.
- **Introduction –**
 - the information provided on opinions at **section 2** is actually local, rather than national Data. This will be clarified in the final document.
 - The climate action plan is one of a number of statutory plans prepared by Local Authorities to address their operational and functional areas. The scope of the Climate action plan (See **figure 2.4**) is one of alignment with these plans rather than to overwrite or amend existing adopted policy, which must also be in accordance with the principles of sustainable development. **Action GL 5** aims to monitor and strengthen this alignment through the development of an integrated tracking system for all statutory plans under RCC remit, measuring progress in project and action delivery.
 - The profile as described – eg. predominantly rural, older age profile, agricultural base and closure of peat related industry and resultant unemployment – is the basis for the statement that there are considerable challenges in mobilising climate action. The reasons for this assumption will be clarified and expanded in the final text.
 - Consultation measures as part of the restricted timeframe for the plan are outlined at **Sevcton 2**. The delivery of most of the actions will require focussed consultation with representative groups, communities and individuals over the five-year plan timeframe.
- **Thematic Sections –**
 - **Action GL 2** - The term “community” in this action delivery context refers to the department within RCC rather than the community at large.
 - **Action GL 4** – A significant amount of training has been carried out to date within RCC for staff and elected members on Climate action and behavioural change, feedback on which has informed the preparation of the draft plan to date. Further training will be developed and effectiveness monitored under the provisions of **Action GL 5**.
 - **Action GL 8** – Green procurement will be embedded in the process through policy to be applied at the request for tender stage. In this way, it will be possible to apply climate action criteria for each project, forming part of the evaluation process from inception. Resources will be managed as part of the assessment process under the public spending code.
 - **Objective BET (iii) & BET 4** – depending on the funding stream, national and EU guidance requires community groups, as part of the application process, to demonstrate a sufficient level of governance in order to ensure that funds can be appropriately administered within each project. Groups are advised to contact RCC should they require assistance with the development of governance structures. Community Capacity building is to be addressed under **Action GL 2**.
 - **Action BET 2** – The potential to address emergency service requirements can be explored as part of the provisions under **Actions BET 4-6**.
 - **Action BET 5** – the development of nature based solutions and biodiversity enhancement measures will be guided by the development of a comprehensive green infrastructure strategy. Outlining specific measures at this stage would curtail the potential range of

solutions and projects that can be applied, including the use of innovative and emerging technologies in the sector. The imminent appointment of a biodiversity officer will also progress developments in this area. Operational training will be developed and provided for under **Action GL 4** and progress monitored under **Action GL 5**. Priority areas/actions within roads projects will be identified as part of the roads programme and tracking progressed under **Action GL 5**.

- **Action BET 6** – Pathfinder planning identified under **Action BET 2** will explore the detail of rainwater harvesting technologies and their application within public buildings.
- **Action BET 11 & 12**– The remit for public transport planning, routes etc. lies with the National Transport Authority and Transport Infrastructure Ireland. RCC engage with these agencies in the alignment of public realm (eg. URDF) and active travel projects to ensure connectivity, maximise effectiveness and climate action potential.
- **Action BET 13** – Showcasing of community projects is essential in raising awareness of the importance of Climate issues to promote behavioural change and affect buy-in for sustainable future practices in support of Climate Action and biodiversity enhancement, further supported by **Action GL 6**.
- **NEGI objective (iii)** - Limited funding is made available nationally on an annual basis for heritage buildings, administered by the heritage office. RCC will investigate potential under additional funding streams under **Action NEGI 4**.
- **NEGI Objective (v) – Actions NEGI 2 & NEGI 4** seek to identify heritage resources and appropriate protection measures, including appropriate public access.
- **Action CRT 2** – Further definition of innovation, research and capacity building in this action could restrict potential opportunities across a broad range of areas.
- **Action CRT 3** – A wide range of supports exist through the Local Enterprise Office and SEAI to promote energy efficiency, also the business community are engaged with RCC in the delivery of project such as those in the public realm.
- **Action CRT 4** – in tandem with **Action GL 8** and specific criteria required under all funding streams, all proposals will be subject to Climate Action proofing. It is recommended that the word “promoting” is replaced with “prioritising” to clarify the purpose of the Action.
- **Action CRT 7**- There are a wide range of communities at risk as part of the transition process and this is likely to change over time. This action has been developed to ensure that none are excluded and a range of measures can be developed to accommodate for changing circumstances and priorities over the plan period. Tracking measures to be developed under **Action GL 5** will ensure the alignment of actions within County level plans across sectors and measure progress.
- **Actions SRM 2 & 3** – This action has been developed to ensure that the remit of RCC as an advocate under the plan scope (**figure 2.4**) defined by national guidelines is realised. This will provide for alignment across RCC departments eg. Environment, Waste, Roads and other agencies such as LAWPRO, SEAI, Roscommon Leader Partnership etc. can be leveraged to work together to maximise climate action potential. A good example of this is the source protection scheme outlined at **section 2.4**.
- **Action SRM 4** –proposals for a pilot mobility hub under **Actions BET 9 & Action DZ 13** may investigate the initiatives proposed, such as EV sharing and electric bikes over the plan period.
- **Decarbonisation zone**
- **Actions DZ 12 & 13, BET 9, 11 & 12** address the potential for active travel, in conjunction with other RCC functions and operations, to contribute to modal shift in support of sustainable travel
- **Action DZ 2 - Actions SRM 1, DZ 1 and DZ 2, RoO 2 & 7** support the development of circular economic activities within the County and Roscommon Town area. In the absence of a detailed appraisal, costings and a definitive funding source, along with the required permits and assessments associated with the redevelopment of a heritage building, it is not possible for RCC

to commit to the specific use of Edenville house for this purpose within the constraints of a five-year statutory plan. RCC are committed to supporting the circular economy and, in particular, community based initiatives of significant socio-economic as well as environmental benefit. It is therefore recommended that **Actions SRM 1** and **DZ 2** are strengthened to provide support to communities as appropriate, to progress, develop and/or expand circular economic activities.

- **Charging infrastructure** – RCC has engaged with ZEVI and Pobal under the JTF for the provision of EV charging infrastructure and is awaiting decisions on a number of proposed points submitted on behalf of local Communities. RCC will continue to engage with the relevant national agencies as opportunities arise.
- **Action DZ 1 & RoO 13** – It is considered that consultation at the waste source and engagement with all sectors is important in the potential reduction of waste, including the potential development of new technologies that can create opportunities across the waste hierarchy. RePAK is therefore a relevant consultee in this regard.

CE Response and Recommendation

This comprehensive submission is welcome, and RCC recognises the time and effort taken to compile this detailed observation. The following amendments to the Draft plan are proposed as a result.

Proposed Amendments to draft

Section 2 – Introduction

- Clarify Local EPA Data
- Specifically relate County Profile to climate challenges

No.	Action	Objectives	Lead	Partners	Timeframe
CRT 4	Climate action proof community grants administered by Roscommon County Council, prioritising projects that can demonstrate improvements in waste minimization, circular economy, energy savings, renewables and behavioural change.	CRT (i),(iii) & (iv)	Climate Action Unit	All grant administering Sections	Q4 2024
SRM 1	Establish links between community organisations at a local level to develop opportunities in the area of waste reduction, reuse and recycling, provide support as appropriate, to progress, develop and/or expand circular economic activities	SRM (i), (ii) & (iii)	Environment	Community, RLP, EPA DECC	Q4 2024
SRM 2	Engage with Teagasc and the agricultural community on the potential for emissions reduction, biodiversity enhancement and environmental pollution prevention in conjunction with existing agri-environmental schemes and through the application of innovative technologies in waste	SRM (i)	Climate Action Unit	RLP, community, Teagasc, DAFM, Farming organisations	Q4 2024

	management and renewable energy generation				
DZ 2	RCC will embrace its lead role in minimising waste and embracing circular economy principles and to leverage influence over resident's behaviours and attitude towards waste and to build capacity in the local and business community to support waste minimisation and the circular economy in Roscommon town <u>and provide support as appropriate, to progress, develop and/or expand circular economic activities</u>		Climate Action Unit	Roscommon Transition Town, Chamber of Commerce, Roscommon Women's Network, SEAI, REPAK, LEADER, 3rd Level, Rediscovery centre, community	Q4 2024

3.4.9 Nephin Renewable Gas

Submission received 13/12/23

Submission Summary

- Outlines company operations and the potential for decarbonisation and other environmental advantages for biomethane and associated industries. Sets out community and farming benefits and interactions with national organisations, agencies, policies and how the industry can contribute socially, economically and environmentally.
- Specifies how the industry can help RCC achieve its targets under natural environment and green infrastructure.
- Suggests that RCC adopt a policy on the purchase of renewable gas, investigate CNG vehicles for fleet, treating grass cuttings through AD, support biomethane awareness to enhance public profile and work with GNI to facilitate network connections to increase the proportion of renewable gas in the grid.

CE Response and Recommendation

The issues outlined in the submission are addressed under **Actions GL 7, BET 4 & 8, NEGI 6 & 7, CRT 1 & 2, 7 & 8, SRM 2, DZ 8 and DZ 16.**

No further amendments are proposed to the Draft plan as a result.

3.4.10 Cloontuskert Development and Tidy Towns Association CLG

Submission received 13/12/23

Submission Summary

- Invasive species within the County should be examined, catalogued and mapped (available for public viewing) in advance of the preparation of a treatment and management plan guided by ecological best practice
- Herbicide use by RCC or their contractors should be regulated by an ecological report
- Progress on achievement of RCC LACAP should be clearly measured and quantified. Burden on voluntary groups should be minimised and appropriate professional and public sector services utilised. Progress should be tracked and information made publicly available and provision made for public feedback.
- Plan delivery should be overseen by responsible local and national departments and agencies to ensure that they are being conducted in line with best environmental practice

CE Response and Recommendation

- **Action NEGI 10** addresses the use of herbicides, operational training and management of invasive species in a climate action context.
- **Action GL 5** addresses tracking measures to be implemented across the range of statutory plans within RCC
- In addition to the tracking and oversight measures proposed under **Action GL 5**, all approved projects will be climate proofed under **Action CRT 4** and will require oversight and monitoring in line with grant agreements

No further amendments are proposed to the Draft plan as a result.

3.4.11 Fáilte Ireland

Submission received 13/12/23

Submission Summary

FI seeks to enhance tourism in the county and the wider region in the context of SDG 13 – Climate Action. The role of FI is defined as supporting the long-term sustainable growth of the economic, social, cultural and environmental contribution of tourism and sets out its legally binding targets to be achieved for the sector up to 2030 and towards carbon neutrality by 2050.

Tourism spans a number of sectors including the built environment, transport and business and enterprise.

FI is supportive of LACAPs and strives to address climate action through supports for tourism businesses, including guidance, training and best practice bespoke advisory at the individual business level and encourages tourism businesses within Roscommon to avail of these.

FI cooperates with other state agencies and representative bodies to implement practical strategies to progress climate action in the sector as an SDG champion, and encourages tourism and enterprise sections of County Councils to collaborate on initiatives that align with FI focus areas

CE Response and Recommendation

The climate action issues raised by Fáilte Ireland are addressed under **Actions NEGI 6, 7, CRT 1 - 3, 7, and DZ 1**.

No further amendments are proposed to the Draft plan as a result.

3.4.12 Irish Bioenergy Association (Irbea)

Submission received 13/12/23

Submission Summary

- Irbea represents the Irish bioenergy sector across solid biomass, biogas/biomethane, biofuels, biochar, wood fuels and energy crops.
- Advocates that the further development and mobilisation of biomass feedstocks and supply chains will provide employment and allow revenue to remain within the local economy and provide lower cost decarbonisation opportunities in the heating and transport areas, as supported by commissioned reports.
- Notes that the draft report does not make specific reference to biogas or biomethane
- Outlines the circular nature of the sector and its potential role in reducing on-farm energy requirements, reduction in emissions to air, soil and water, reduction in need for chemical fertiliser, potential generation of heat and electricity and use as a transport fuel and ultimately in farm diversification.
- SEAI support scheme for renewable heat – undersubscribed.
- Potential for District heating
- Biochar and potential for carbon sequestration

CE Response and Recommendation

The issues outlined in the submission are addressed under **Actions GI 7, BET 4 & 8, NEGI 6 & 7, CRT 1 & 2, 7 & 8, SRM 2, DZ 8 and DZ 16.**

No further amendments are proposed to the Draft plan as a result.

3.4.13 3.4.13 Irish Farmers Association

Submission prepared following meeting with Climate Action Unit, 07/12/23

Submission Summary

- The perception of many farmers in these marginal areas is one of public misrepresentation in terms of environmental impact (quantification of emissions) and sustainability concerns (stability of herd numbers and the carbon cycle – land-use efficiency) and a lack of support and incentives at national level, putting their “freedom to farm” in jeopardy.
- Animal Protein, with appropriate management, is the most efficient and sustainable output on marginal grasslands.
- The national climate action plan requires the construction and operation of some 200 Anaerobic Digestion plants for the generation of renewable gas up to 2030. These will require input and cooperation with the agricultural community. The lack of supports and incentives, including the continued delay of the publication of the national biomethane strategy are a significant barrier to the development of this technology at farm level.
- Code of Practice for Greenways agreed with TII and farming organisations in December 2021 -Should be used as standard by Local Authorities in the planning, design, implementation and operation of greenways
- Farming in the region and its contribution to climate action to date is poorly represented. No Teagasc signpost demonstration farms/research into soil carbon sequestration along the drumlin belt to the north of the county. ECO and ACRES scheme measures are not quantified or credited in terms of biodiversity, water quality and climate action improvements and are therefore not recognized in the public eye. Private CO₂/GHG testing could address this issue while providing a more accurate public picture of the contribution of these farms to sustainable development and climate action.
- There are a number of EIPs operating in the area that illustrate the strong commitment of the agricultural community to environmental action and custodianship. These should be marketed, expanded and extended and promoted publicly to showcase socio-economic and environmental achievements.

- The system of forestry grants and licensing is inconsistent, eg. Grant support for 20 years, conifer plantation matures at 35 years and felling license is not guaranteed at this time. Broadleaf plantation – grant for 20 years, however this land is essentially “set aside”.
- Scheme measures not always well thought out or preparations made, eg. Saplings not available to implement hedgerow measures in ACRES schemes
- Farming, particularly in marginal areas, plays an essential social inclusion role. The age and gender profile of many farmers in this region means that farming events such as marts are important social opportunities for people to connect and engage with other services such as health and welfare. The process of just transition is interlinked with the farming community, who in some cases, have lost employment in the peat industry that supplemented a subsistence agricultural income.
- Indiscriminate use of pesticides and herbicides by the public is a serious issue. Use of these chemicals is regulated in the agricultural industry and training provided in their use, however, unrestricted amounts can be purchased over the counter for private use without training or supervision. This is a serious risk to water quality, biodiversity and public health and should be addressed.
- TAMs and Micro-generation schemes are over-subscribed. Further incentives are needed to encourage decarbonisation of energy and transport in the Agri-sector.
- Submission includes detailed statistics on farming and the agri-based economy in County Roscommon and the IFA Thomond Park declaration on climate Action (April 2023)

Overall there needs to be a recognition that farmers are and have been environmental custodians of the landscape for millennia. The misrepresentation of agriculture, particularly extensive farming in marginal areas is unhelpful in moving towards a carbon neutral society. Local Authorities and national departments, organisations and agencies need to work with farmers to address this and mobilise meaningful climate action.

CE Response and Recommendation

Engagement with the agricultural community is welcomed as outlined throughout the Actions contained within the Plan.

Proposed Amendment to draft

It is recommended that Section 2.4 Climate action in the Community is amended to recognise the contribution of the agricultural community to climate action efforts and the potential to continue this into the future

3.4.14 St. Nathy's Green Schools Committee

Submission received 12/12/2023

Submission Summary

- Students reviewed and compiled responses to the plan
- Further scope for working with schools and making them more sustainable – lack of appropriate funding – Roscommon County Council should become more involved as partners in relevant initiatives
- Further training required for green schools committees and education programs, workshops, tidy schools award, Roscommon clean-up day etc. to embed sustainability concepts and habits in younger generation as future leaders, members of society
- Funding better bin facilities, awareness of food waste, waste segregation – costly for individual schools, should be centrally funded to embed positive habits to filter out to homes and communities
- Successful water bottle refill facility operational in school saving 20000 plastic bottles to date. This should be rolled out to all schools in the County. Biodegradable food packaging should also be promoted.
- EV charging facilities should be located in schools to encourage change to Electric Vehicles.
- Education and funding are essential to create responsible sustainable citizens into the future.

CE Response and Recommendation

This well considered and insightful submission from the students of St. Nathy's is welcomed.

Provisions have been made throughout the draft to facilitate the development of actions such as those outlined above, particularly at the following Actions:

- **Action GL 2** (in relation to potential future funding streams and training),
- **Actions BET 10 & 11** (in relation to charging infrastructure)
- **Actions NEGI 7 & CRT 2** (In relation to potential future climate action initiatives) and;
- **Actions SRM 1 & 3** (Waste management and behavioural Change).

Proposed Amendment to draft

It is considered that the issues raised in the submission can be addressed within the scope of the Actions as outlined in the Draft Plan. No amendments are therefore proposed.

3.5 Additional Recommendations

The following recommendations are proposed for the purpose of legibility and to recognise existing and ongoing climate initiatives.

- That additional highlights are included on the Climate Change Risk assessment at section 2.3
- That **Action GL 8** is moved to **SRM 1** and all other Actions renumbered accordingly
- The following amendments are made to **Action CRT 2**:

No.	Action	Objectives	Lead	Partners	Timeframe
CRT 2	Promote innovation, research and capacity building in the climate action area in conjunction with the local authority departments, communities and external agencies, including 3rd level institutions <u>and sporting organisations, including engagement with the Green Club Programme, working with the CARO and GAA, in the promotion and support of projects by participating clubs to meet the objectives, and during key phases of the programme to 2029</u>	CRT (i),(ii) & (iii)	Climate Action Unit	Community, Economic Development, NTA, Western Development Commission, NWRA, Teagasc, government departments and agencies, GRETB, 3rd level institutions, RLP, PPN, CARO, GAA, CCMA	Q4 2025

3.6 Summary of Chief Executive's recommended Modifications to Draft Climate Action Plan

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

Draft CAP Section and Page	Proposed Modifications						SEA & AA Assessments										
2. Introduction	<ul style="list-style-type: none">Clarify Local nature of analysis in introductionExpand on assumptions relating to County profile in text						Applies to narrative only										
2.4 Climate Action in the Community p. 20	<ul style="list-style-type: none">Include reference to community work to date in seed-saving and community gardensInclude text recognising the contribution of the agricultural community to climate action efforts and the potential to continue this into the future						Applies to narrative only										
3.1 Climate Change Risk Assessment	<ul style="list-style-type: none">Further details on Climate Change Risk assessment to be included in Final Plan						Applies to narrative only and summary of existing appendix										
4.4.1 Governance and Leadership	Action GL8 to be moved to Action SRM 1 and Actions renumbered accordingly						This amendment is intended to ensure plan organisation. The amendment does not result in the introduction of additional environmental effects not already considered under the SEA/AA process to date. This amended action provides clarification to the text previously considered. It clarifies the Plan will be aligned with high order plans. This amendment is not likely to have any significant environmental effects not already considered in the SEA and AA process.										
	Proposed modification of Action GL1																
	<table><tr><th>No.</th><th>Action</th><th>Objectives</th><th>Lead</th><th>Partners</th><th>Timeframe</th></tr><tr><td>GL I</td><td>Prepare and adopt Roscommon County Climate Action Plan in accordance with obligations and to highlight organisational commitment to carbon neutral transition, to periodically review actions to ensure alignment with higher order plans, in line with emerging findings on future climate impacts and new technologies and ensure that relevant findings at local level are fed upwards into national level policy and decision-making</td><td>GL (i), (ii) & (viii)</td><td>Climate Action Unit</td><td>All govt. departments, Sectors, elected members, community, CARO</td><td>Q1 2024, Q1 2026, as required</td></tr></table>	No.	Action	Objectives	Lead	Partners		Timeframe	GL I	Prepare and adopt Roscommon County Climate Action Plan in accordance with obligations and to highlight organisational commitment to carbon neutral transition, to periodically review actions to ensure alignment with higher order plans , in line with emerging findings on future climate impacts and new technologies and ensure that relevant findings at local level are fed upwards into national level policy and decision-making	GL (i), (ii) & (viii)	Climate Action Unit	All govt. departments, Sectors, elected members, community, CARO	Q1 2024, Q1 2026, as required			
No.	Action	Objectives	Lead	Partners	Timeframe												
GL I	Prepare and adopt Roscommon County Climate Action Plan in accordance with obligations and to highlight organisational commitment to carbon neutral transition, to periodically review actions to ensure alignment with higher order plans , in line with emerging findings on future climate impacts and new technologies and ensure that relevant findings at local level are fed upwards into national level policy and decision-making	GL (i), (ii) & (viii)	Climate Action Unit	All govt. departments, Sectors, elected members, community, CARO	Q1 2024, Q1 2026, as required												

4.4.3 Natural Environment and Green Infrastructure	NEGI 10	Implement the <i>sustainable management practices for public open spaces report and guidelines</i> with the aim of advocating for the elimination and avoidance of glyphosate-based products in local authority operations and promote education and awareness on the use of herbicides and pesticides to the public and local communities to protect biodiversity and water quality. Training regarding herbicides and pesticides promotes use that does not cause significant effects on the receiving water environment, biodiversity or European sites Highlight danger of invasive species and develop internal and external educational resources on prevention and biodiversity-aware eradication. Ensure that the invasive species educational resource is developed by a competent ecology team.	NEGI (i), (v), (vi), (vii) & (viii)	Climate Action Unit	Maynooth University, DECC, DAFM, IFA, community, Uisce Eireann, NPWS, LAWPRO, National federation of group water schemes	Q2 2024	This amendment is not likely to have any significant environmental effects not already considered in the SEA and AA process.
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4.4.4 Community resilience and Transition

Proposed modification of Action CRT 2							
No.	Action	Objectives	Lead	Partners	Timeframe		
CRT 2	Promote innovation, research and capacity building in the climate action area in conjunction with the local authority departments, communities and external agencies, including 3rd level <u>and sporting organisations, including engagement with the Green Club Programme, working with the CARO and GAA, in the promotion and support of projects by participating clubs, to meet the objectives, and during key phases of the programme to 2029</u>	CRT (i),(ii) & (iii)	Climate Action Unit	Community, Economic Development, NTA, Western Development Commission, NWRA, Teagasc, government departments and agencies, GRETB, 3rd level institutions, RLP, PPN, CARO, GAA, CCMA	Q4 2025	This amended action provides clarification to the text previously considered. It adds stakeholders and actions that are considered in this action.	
Proposed modification of Action CRT 4							
CRT 4	Climate action proof community grants administered by Roscommon County Council, <u>prioritising</u> projects that can demonstrate improvements in waste minimization, circular economy, energy savings, renewables and behavioural change.	CRT (i),(iii) & (iv)	Climate Action Unit	All grant administering Sections	Q4 2024		This amendment is not likely to have any significant environmental effects not already considered in the SEA and AA process.
Proposed modification of Action CRT 5							
CRT 5	Support communities in the development of nature-based solutions in line with green infrastructure strategy and source protection guidance in place. <u>RCC will collaborate with communities to strengthen local food security and promote equity and well-being through support for community gardens allotments as appropriate.</u>	CRT (iii) & (v)	Roads and Transportation	LAWPRO, EPA, NPWS, OPW, 3rd level institutions, community groups, town teams, SECs	Q4 2025	This amended action provides clarification to the text previously considered. This amendment is not likely to have any significant environmental effects not already considered in the SEA and AA process.	

4.4.5 Sustainable Resource Management	Proposed modification of Action SRM 1						This amended action provides clarification to the text previously considered. It clarifies the County collaboration towards circular economy activities.
	SRM 1	Establish links between community organisations at a local level to develop opportunities in the area of waste reduction, reuse and recycling, <u>provide support as appropriate, to progress, develop and/or expand circular economic activities</u>	SRM (i), (ii) &(iii)	Environment	Community, RLP, EPA DECC	Q4 2024	
	Proposed modification of Action SRM 2						This amended action provides clarification to the text previously considered. This amendment is not likely to have any significant environmental effects not already considered in the SEA and AA process.
	SRM 2	Engage with Teagasc and the agricultural community on the potential for emissions reduction, biodiversity enhancement and environmental pollution prevention <u>in conjunction with existing agri-environmental schemes and</u> through the application of innovative technologies in waste management and renewable energy generation	SRM (i)	Climate Action Unit	RLP, community, Teagasc, DAFM, Farming organisations	Q4 2024	
5.4 Decarbonisation Zone Actions	Proposed modification of Action DZ 2						This amendment is not likely to have any significant environmental effects not already considered in the SEA and AA process, and mitigated against under the Environmental Governance Principles defined
	DZ 2	RCC will embrace its lead role in minimising waste and embracing circular economy principles and to leverage influence over resident's behaviours and attitude towards waste and to build capacity in the local and business community to support waste minimisation and the circular economy in Roscommon town <u>and provide support as appropriate, to progress, develop and/or expand circular economic activities</u>		Climate Action Unit	Roscommon Transition Town, Chamber of Commerce, Roscommon Women's Network, SEAI, REPAK, LEADER, 3rd Level, Rediscovery centre, community	Q4 2024	

	Proposed modification of Action DZ 16						
	16	Initiate a study on the potential for alternative heat sources, including Geothermal potential , within the Roscommon Town DZ area for residential, commercial, community and public sector/institutional application	Climate Action Unit	Completion of study and implementation of recommendations	Housing, ESB, GNI, DECC	Q4 2025	

4. Conclusion and Recommendation

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

The Elected Members have up to 6 weeks to consider this Chief Executive's Report, in accordance with the requirements of the Climate (Amendment) Act 2021 and decide by resolution, whether to:

- approve, or
- approve, subject to such modifications as they consider appropriate, the local authority climate action plan.

Taking into account the:

- Draft Roscommon County Climate Action Plan 2024-2029, Including SEA and AA reports
- this Chief Executive's Report on Draft Plan Public Consultation,
- Strategic Environmental Assessment and Appropriate Assessment Screening of Chief Executive's Recommendations,

it is proposed that the Draft Climate Action Plan be approved by the Elected Members, in accordance with the recommendations of this report.

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

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

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

No.	Plan Reference	Name
1	3.1.1	Environmental Protection Agency
2	3.1.2	Department of Environment, Communication and Climate
3	3.1.3	Department of Housing, Local Government and Heritage
4	3.3.1	Department of Transport
5	3.4.1	Cllr. Orla Leyden
6	3.4.2	Community Gardens Ireland
7	3.4.3	Renewable Gas Forum Ireland
8	3.4.4	Cllr. Pascal Fitzmaurice
9	3.4.5	Anonymous Submission 1
10	3.4.6	Anonymous Submission 1
11	3.4.7	Sean Butler Hillside Holistic farm
12	3.4.8	Roscommon Transition Town
13	3.4.9	Nephin renewable Gas
14	3.4.10	Cloontuskert Development and Tidy Towns Association CLG
15	3.4.11	Fáilte Ireland
16	3.4.12	Irish bioenergy Association (Irbea)
17	3.4.13	Irish Farmers Association
18	3.4.14	St. Nathy's Green Schools Committee

Acknowledgements were received from ESB and Comhairle na nÓg

Appendix B: Public Notice of Draft Plan Public Consultation



Climate Action and Low Carbon Development (Amendment) Act 2021 Section 16

NOTICE OF THE PREPARATION OF THE ROSCOMMON COUNTY COUNCIL DRAFT CLIMATE ACTION PLAN 2024-2029

Notice is hereby given that Roscommon County Council has, pursuant to Section 16 of the Climate Action and Low Carbon Development (Amendment) Act 2021, prepared a Draft Climate Action Plan 2024-2029. The draft Plan sets out how the local authority can promote a range of mitigation, adaptation and other climate action measures, to help deliver on the national climate obligations and 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 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)
- An Appropriate Assessment (AA) Natura Impact Report, pursuant to Article 6 of the Habitats Directive 92/43/EEC.

Submissions are invited on the Roscommon County Council Draft Climate Action Plan 2024-2029, and the accompanying reports outlined above, **from Friday 27th October to Wednesday 13th December 2023**. The Plan and accompanying reports will be on display during this period at the following locations:

- online at www.roscommoncoco.ie
- at Roscommon County Council, Monday to Friday (excluding Bank Holidays) between the hours of 9.30 am to 1.00 pm and 2.00 pm to 3.30 pm.
- Boyle and Athlone Area Offices
- All branches of Roscommon Libraries during Library opening hours.

Public Information Sessions

A series of public information sessions in respect of the Draft Climate Action Plan are planned as set out below:

- 21st November King House, Boyle
- 24th November Roscommon County Council
- 28th November Trinity Arts Centre, Castlereagh.

Any further public consultation events will be advertised during the consultation period on www.roscommoncoco.ie.

Written submissions or observations regarding the Draft Climate Action Plan, Strategic Environmental Assessment Environmental Report and Appropriate Assessment Report, are invited from members of the public and other interested parties.

You can make a submission or observation **between Friday October 27th and Wednesday 13th December 2023 inclusive**, by the following means:

A written submission can be made:

- Electronically: by email to climate@roscommoncoco.ie;
- By post to the following address:
Draft Roscommon County Climate Action Plan,
Climate Action Unit,
Áras an Chontae,
Roscommon,
Co. Roscommon
F42 VR98
- By hand: Entitled 'Draft Roscommon County Climate Action Plan', Áras an Chontae, Roscommon, Co. Roscommon F42 VR98

Please make your submission or observations by **one medium only** i.e., via email or in hard copy.

Submissions or observations should include your name and address and, where relevant, details of any organisation, community group or company etc. which you represent. Children, or groups or associations representing the interests of children, are particularly encouraged to make submissions or observations regarding the foregoing. Written submissions or observations with respect to the draft Plan that are made within the period stated, will be taken into consideration before the making of the Plan. Please note LATE submissions or observations will not be considered. You are strongly advised to make your submission or observation as early as possible.

Data Protection Following the consultation stage, a report summarising the issues raised and the Chief Executive's recommendation will then be presented to the Elected Members for their consideration in February 2024. All submissions received **that provide consent**, will be published on the website of the Council accompanied by their name or the organisation's name they submitted on behalf of. Their name will be listed in the Chief Executive's report which will be published on the website of the Council. Where consent has not been provided, the name of individuals will not be published on the website of the Council, however the content of their submission will be published on the website of the Council. The full privacy statement associated with the processing of your data for the submission on the Draft Climate Action Plan 2024 -2029 is available on Council's website at www.roscommoncoco.ie.

Caitlín Conneely

Director of Services Climate Action, Environment, Rural Water, Water Services, Laboratory, Information Systems, Corporate Services, Assets & Energy Management, Health & Safety and Human Resources

Dated: Thursday 26th October 2023

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

SEA Screening Conclusion and Determination

AA Screening Conclusion and Determination

To be completed following SPC approval to proceed