

**Local
Authority
Climate
Action Plan
2024 -2029**

**Chief Executive's
Report of
Submissions to the
Draft Plan**

 Comhairle Cathrach
& Coriáil Luimnigh
Limerick City
& County Council

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PART A

INTRODUCTION, PURPOSE AND CONSULTATION

1. Introduction

Limerick City and County Council has prepared a Draft Local Authority Climate Action Plan, which will be the first Local Authority Climate Action Plan since the enactment of the Climate Act 2015 - 2021.

The preparation of the Local Authority Climate Action Plan 2024-2029 (hereafter referred to as the Draft LACAP) is one of the most important functions of the Council. The Draft Plan will act as a blueprint for the transition of Limerick to becoming a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy by 2050. The actions outlined in the plan not only look at how Limerick City and County Council can transform its own operations and services, but also addresses what other organisations the Council can collaborate with and what supports it can give to local communities and individuals in addressing the climate change challenge.

A total of 12 submissions have been received. A further late submission was received after the closing date. However, given that the closing date was a bank holiday it will be taken into account in the drafting of this report.

Limerick City and County Council wish to take the opportunity to sincerely thank all those who made submissions, all those who gave their time to attend meetings, and engaged with officials and also the Elected Members.

1.1 Format of the Report

This Chief Executive's Report is set out as follows:

- Part A sets out the introduction, purpose and legislative requirements of this report and outlines the public consultation process;
- Part B summarises the submissions received from adjoining authorities and statutory bodies, followed by submissions by members of the public and sets out the Chief Executive's opinion and recommendations on the issues raised. The submissions are set out in the order they were received;
- Part C contains a detailed response to the Draft SEA Environmental Report and Draft NIR
- Part D sets out the proposed Material Alterations arising from the Chief Executive's recommendations set out in Part B;
- Appendix 1 contains a copy of the public notice.

1.2 Legislative Background for the Chief Executive's Report

Written submissions received to the Draft LACAP play an important role in supporting the local authority to shape the direction of the plan presented to the elected members for adoption. Each local authority is required to consider all submissions made to the Draft LACAP in line with the provisions of the Climate Acts 2015-2021. Separately, the Acts call explicitly for the consideration of submissions made to the draft plan by adjoining local authorities.

All submissions received over the duration of the public consultation period must be documented formally. This can be undertaken by way of a report on submissions. This report should:

- List the persons or entities who made submissions,
- Provide a summary of issues raised by submissions,
- Distinctly summarise and address submissions from prescribed environmental authorities and others on matters specific to SEA and AA issues or documentation,
- Provide responses and recommendations for the final climate action plan upon consideration of the content of submissions.

1.3 Purpose of the Chief Executive's Report and Next Stage

The preparation of a new LACAP involves a 3 Stage process as set out in Figure 1 below. This report forms part of Stage 2 - the Statutory Plan Making Phase for making a Local Authority Climate Action Plan.

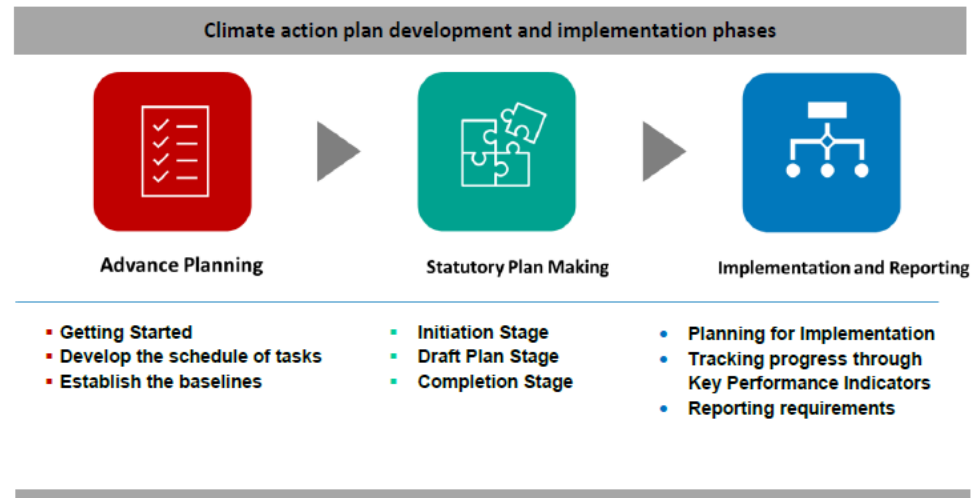


Figure 1: Climate action plan development and implementation phases

The purpose of the Chief Executive's Report is to set out the consultation process on the Draft LACAP, including a summary of any submissions or observations, a specific response to submissions made in respect of the Draft SEA Environmental Report and Draft NIR, the setting out of the Chief Executive's response to the issues raised and recommendations on alterations to the Draft LACAP

The elected members maintain responsibility for making the Local Authority Climate Action Plan. In preparation for the adoption of the plan, the elected members were circulated with a link to the draft plan and draft SEA Environmental Report and draft NIR. At this stage, they are furnished with the following information for their consideration:

- Report on submissions received during public consultation of the draft plan - Section B.
- Detailed response to submissions in relation to the draft SEA Environmental Report and draft NIR including final determination on each- Section C.
- The proposed changes to the draft LACAP to show proposed amendments recommended as an outcome of public consultation as well as other error in the drafting of the plan - Section D.

The elected members are required by resolution to approve the draft plan or to approve the draft plan subject to modification. 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.

Elected members must adopt the final plan **within six weeks** of receipt of the documentation being circulated. The LACAP comes into effect from the date it is approved by the elected members and remains in effect for a period of five years.

Final Publication

Within 30 days of the adoption of the final Local Authority Climate Action Plan by the elected members, the local authority must publish the final plan in a legible manner. Within this timeframe, the local authority will finalise the plan and publish a notice of the publication of the final plan.

1.4 Draft Plan Consultation

The process of making the LACAP must be open, transparent and inclusive. All individuals and organisations, at local, regional and national level, must be given adequate opportunity to make submissions or observations on the Draft Plan for consideration by the Elected Members.

All members were briefed in advance of the preparation of the Draft Plan and a pre-draft consultation was held between 7th July 2023 and 4th August 2023 to invite observations and recommendations for consideration in the draft Plan.

The Draft Plan consultation was carried out between 22 December 2023 and 5 February 2024. This was advertised in the local press and on the Council's website. Copies of the plan were made available at all area offices and public libraries throughout the county. Furthermore a number of drop in sessions were held in each Municipal District as follows:

Location	Time
Kilmallock	18th January 6 pm - 8 pm
Newcastle West	16th January 5 pm - 7 pm
Rathkeale	17th January 3pm - 5pm
City Library	23rd January 5 pm - 7 pm

SECTION B

SUBMISSION SUMMARIES, CHIEF EXECUTIVE’S RESPONSE AND RECOMMENDATION

No. 1	Ref. & Name / Group	Department of Agriculture Food and the Marine (DAFM)	
	Submission / Observation Summary		Chief Executive’s Response
	<p>DAFM had a significant role in preparing the national climate action plan. A number of actions are already being undertaken to reduce the use of chemical fertilizers, the age of slaughter as well as new targets for tillage production and organic farming. Diversification will be necessary to increase the resilience of the sector and farmers will require support to diversify. The DAFM forest Strategy and national biomethane strategy offers such an opportunity. The submission requests that these policies be taken into consideration in the preparation of the plan.</p>		<p>These strategies were taken into account as part of the preparation of the LACAP in particular the SEA and NIR. The Local Authority will support the agricultural sector to meet its Climate Action targets in accordance with the proper planning and sustainable development of the county. The council will have appropriate regard to these policies during the implementation of the plan over the coming 5 years.</p>
	Chief Executive’s Recommendations		
No change proposed.			
No. 2	Ref. & Name / Group	Community Gardens Ireland	
	Submission / Observation Summary		Chief Executive’s Response
	<p>Highlights the benefits of community gardens in respect of physical, mental health, educational, environmental, biodiversity and culture. Ireland lags behind other countries in the provision, support and protection of allotments and community gardens. Submissions requests:</p> <ul style="list-style-type: none"> • Growing your own food is a climate friendly action for communities • The LACAP should include a plan to increase the provision of allotments and community gardens. • Urban agriculture should be supported in the LACAP • 		<p>The economic, health and environmental benefits of a biodiversity rich environment is recognised in the plan. Specific actions within the LACAP support this submission. In particular Action N4 which seeks to develop a local food growing strategy supports this submission</p>
	Chief Executive’s Recommendations		
No change proposed.			
No. 3	Ref. & Name / Group	Inland Fisheries Ireland	

	Submission / Observation Summary		Chief Executive's Response
	<p>Highlights the impact of climate change on fish species - distribution, abundance, phenology (timing of life events i.e. spawning etc.), species composition and community structure and dynamics. Other impacts include invasive species, the spread of water-borne diseases etc. The LACAP needs to recognise that protection not only of the aquatic environment requires the protection of water quality as well the protection and maintenance of the physical habitat and hydrological processes / regimes. The submission advocates the use of nature based solutions in developing flood resilience in particular the management of riparian buffer zones. In particular the use of SuDs. The submissions references the guidance published by the department of Housing, Local Government and Heritage on Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas. IFI wishes to be involved in the design of flood relief works from an early stage. The submissions requests that the local authority maintains a water abstraction register. In respect of transport, the submission encourages a commitment that all road pipelines are constructed so as not to pose a threat to surface waters. It also seeks a policy on the use of clean span structures on fisheries waters. Also in respect of active travel routes the use of wildlife corridors should be encouraged and they reference their own publication "Planning for Watercourses in the Urban Environment"</p>		<p>The plan advocates the use of Nature Based Solutions and in particular Suds as a way to promote flood resilience. The Council will have due regard to these guidance documents over the plan period in particular in the design, planning and delivery of site specific projects.</p>
	Chief Executive's Recommendations		
	No change proposed		
No. 4	Ref. & Name / Group	Kerry County Council	
	Submission / Observation Summary		Chief Executive's Response
	<p>The submission notes that there are some shared themes in both county plans. It notes that there will be need for cooperation in implementing the plan in areas such as transport mitigation, EV charging infrastructure, adaptation of infrastructure, coastal protection, developing the renewable energy potential of the Shannon estuary, potential pathfinder projects, research opportunities and general awareness raising campaigns. The submission further notes the SEA ER and NIR.</p>		<p>LCCC welcomes the comments from Kerry County Council in particular the acknowledgement of the need to co-operate on implementing key actions, which will bring added value and accelerate progress towards decarbonisation.</p>
	Chief Executive's Recommendations		
	No change proposed		

No. 5	Ref. & Name / Group	Failte Ireland	
	Submission / Observation Summary		Chief Executive's Response
	Failte Ireland welcomed the opportunity to comment of the LACAP. It notes that the plan refers to tourism and in making this submission; it seeks to ensure the enhancement of tourism in Limerick. The submission reiterates the promotion of SDG13 into local authority tourism practice. It states that like all sectors of the economy it is committed to achieve a 50% reduction in greenhouse emissions by 2030 and achieving net zero by 2050. The submission highlights a range of policies that Failte Ireland are implementing to reach this target.		LCCC welcomes the submission by Failte Ireland and notes its commitment to delivering on its own sectoral emissions
	Chief Executive's Recommendations		
No change proposed			
No. 6	Ref. & Name / Group	Cork County Council	
	Submission / Observation Summary		Chief Executive's Response
	Cork County Council, as an adjoining Local Authority, is looking forward to co-ordinating with Limerick City & County Council where appropriate in relation to the mitigation measures and adaptation measures, proposed to be adopted in Limerick City & County Council's Climate Action Plan. Cork County Council acknowledge that there are opportunities for collaboration and shared learning experiences, such as on the proposed N20/M20 upgrade works and in looking at ways to encourage energy savings on transport connectivity between Cork and Limerick City and County would welcome further consultation in relation to the mitigation measures and adaptation measures proposed to be adopted in Cork County Council's Climate Action Plan. It notes that Limerick City & County Council's Draft Climate Action Plan is accompanied by a Strategic Environmental Assessment Environmental Report and Appropriate Assessment Natura Impact Report and note the conclusions reached therein.		Limerick City and County Council welcomes the opportunity to work collaboratively with Cork County Council on projects such as the N20/M20 upgrade.
	Chief Executive's Recommendations		
No change proposed			
No. 7	Ref. & Name / Group	Environmental Protection Agency	
	Submission / Observation Summary	Chief Executive's Response	

	<p>The submission highlights the role of the EPA in the SEA/AA process. In respect of the plan, it recommends that a specific action be included to carry out implementation monitoring to ensure that progress achieving the actions and measures across the Plan is being monitored and reported on. It also recommends that the finding of the SEA ER and NIS be fully reflected in the plan</p>	<p>Limerick City and County Council welcome the comments of the EPA and will ensure that the findings of the EIA, ER and NIS are fully incorporated into the plan. In respect of the actions to carry out monitoring of plan implementation reference is had to Action G7, G15 and G16 which commits to establish a comprehensive monitoring and evaluation of the plans objectives and actions. Furthermore, the Council is committed to fully implement the mitigation measures outlined in the SEA Environmental Report as well as any relevant recommendations that come from the State of Environment Report, Ireland's Environment - An Integrated Assessment 2024 once published.</p>
Chief Executive's Recommendations		
<p>SECTION 6.1 INSERT THE FOLLOWING : "Limerick City and County Council will continuously review this plan to ensure that it is aligned with all relevant national strategies and guidelines.</p> <p>SECTION 6.3.4 INSERT THE FOLLOWING "Ensure that the mitigation measures outlined in Section 8 of the SEA Environmental Report are implemented in the course of implementing this plan.</p>		
No. 8	Ref. & Name / Group	Department of Agriculture, Food and the Marine - National Seafood Centre
	Submission / Observation Summary	Chief Executive's Response
	<p>The submission highlights the role the marine area plays in the sustainability of Ireland's coastal communities and highlights that these communities have a significant role to play in contributing to the climate goals and the transition to carbon neutrality. Specific reference is had to the Agriculture, Forest and Seafood Climate Change Sectoral Adaptation Plan as well as the European Commission's Communication on the energy transition of the fisheries and aquaculture sector as part of its Fisheries Policy Package. It requests that that all local authorities include relevant steps to support a just Transition for the sea fisheries and aquaculture sectors in their LACAPS.</p>	<p>Limerick does not have a seafood industry however, the plan recognises under Action N5 the need to support the national marine spatial plan as well as Action B11 which supports the Shannon Estuary Taskforce Plan subject to no significant environmental effects.</p>
Chief Executive's Recommendations		
No change proposed.		
No. 9	Ref. & Name / Group	N/M20 Project Office
	Submission / Observation Summary	Chief Executive's Response
	<p>The project office welcomes the identification of the N/M20 as a key national road infrastructure. The submission highlights that the project is a multi-modal project and is therefore aligned to ambitions of the LACAP in particular it highlights the application of whole life carbon management in the project. The submission highlights that the N/M 20 project could be a pilot for a number of initiatives in the development of new transport corridors.</p>	<p>Limerick City and County Council welcomes the submission from the project and reiterates its support for the project as outlined in the plan. Limerick City and County Council look forward to utilising many of the learning from the project in its own transport initiatives in the future.</p>

Chief Executive's Recommendations			
No change proposed.			
No. 10	Ref. & Name / Group	GAS NETWORKS IRELAND	
	Submission / Observation Summary		Chief Executive's Response
	The submission supports the LACAP and highlights the role that renewable gases such as biomethane and green hydrogen will play in the energy transition. In addition, Compressed Natural Gas can play a role in the HGV sector which will also contribute to improved air quality. It requests that sections 4.2 Buildings and Energy, and section 4.6 Circular Economy and Resource Management could include specific reference to these areas.		The submission by Gas Networks Ireland is welcomed. While the plan makes specific reference to anaerobic digestion / biomethane there is no direct reference to the role of green hydrogen and Compressed Natural Gas as alternative fuel sources.
	Chief Executive's Recommendations		
It is proposed to make reference to the potential use of CNG and Green Hydrogen in section 4.2 Buildings and transport and to refer to the draft national biomethane strategy in section 4.6 under circular economy.			
No. 11	Ref. & Name / Group	Antaris Consulting	
	Submission / Observation Summary		Chief Executive's Response
	The submission states that they are concerned that the action plan in its current form is insufficient to realise the GHG reductions required to meet the 2030 target or put LCCC on a trajectory to a net zero future by 2050. It recommends that the Council identify the barriers to successfully implement the plan. Antaris consider that many of the actions are vague in particular Action B10 to implement the LSMATS Strategy especially in the context that on its own it will have achieve the emission reduction targets. In general, they consider that all actions should have a target of GHG emissions such as the SECAP. In respect of governance, it considers the annual report and month management team meetings as being insufficient. In respect of all actions the submission recommends that a risk analysis be prepared for each action. Finally, the submission wishes to have all actions in the nation climate action plan 2023 addressed in the plan		The submission from Antaris is welcomed and appreciated. However, the target of the LACAP is set out clearly in the document - to reduce carbon emissions from the council's activities by 50%. This is to be done by specific actions on its fleet, its buildings and operations such a public lighting. Progress on these activities is reported through the SEAI monitoring tool. Outside of that, the role of the plan is to influence, co-ordinate, facilitate, and advocate. It is not possible to put a GHG reduction target to many of these actions, as they are adaptation measures. A fundamental element of achieving net zero by 2050 is to understand how existing buildings are functioned, what alternatives exist for the vehicle fleet etc. Only then will the council be able to provide a specific target. The actions from the National Climate Action Plan that are recommended to be addressed in the LACAP will be addressed as part of the implementation of LSMATS and the Limerick Transport Plan.
	Chief Executive's Recommendations		
No change proposed			

No. 12	Ref. & Name / Group	Limerick Cycling Campaign	
Submission / Observation Summary		Chief Executive's Response	
<p>They consider that the LACAP lacks targets and timelines. In particular, actions do not an associated Green House Gases emissions reduction target. It also wishes to seek the modal shift targets in LSMATS incorporated into the strategy. The implementation of LSMATS as a single action is considered not to be appropriate. In particular, the lack of an implementation plan for LSMATS is not included. It proposes that a whole suite of actions be included in the plan that are set out thematically.</p>		<p>The LAPCAP is clear and unambiguous setting out its targets and timeline. The target is a reduction in the Council's carbon emissions by 50% by 2030 and carbon neutrality by 2050. The Council is fully accountable for this target. Outside of that, the role of the plan is to influence, co-ordinate, facilitate, and advocate. It is not possible to put a GHG reduction target to many of these actions, as they are adaptation measures. In addition to the global action to implement LSMATS a number of key elements of that strategy are supported by the plan - active travel, EV charging strategy and a freight strategy.</p>	
Chief Executive's Recommendations			
No change proposed			
No. 13	Ref. & Name / Group	Department of Housing Local Government and Heritage - heritage related observations	
Submission / Observation Summary		Chief Executive's Response	
<p>The department welcomes the publication of the LACAP and points to the sectoral adaptation plan for the built and archaeological heritage as a support to the implementation of the plan. The department is already engaging with the local authority sector and will continue to do. The department makes a number of recommendations that any future adaptation strategies should take account of including climate change risk assessment on historic monuments and developing skills within the local authority. The submission also highlights the impending guidance document on energy efficiency in traditional buildings as a resource to be use. The submission also recommends that conservation officers and archaeologists be part of the climate action team.</p>		<p>The departments comments are welcomed in particular their ongoing support for the protection of our built heritage. The Council will in implementing the plan have reference to the sectoral adaptation strategy as well as the guidance document on energy efficiency in traditional buildings. The conservation officer and archaeologist will be part of the overall climate action team and the sub groups that will be constituted over the lifetime of the plan.</p>	
Chief Executive's Recommendations			
No Change proposed.			

SECTION B

DETAILED RESPONSES TO CONSULTATION SUBMISSIONS RELATING TO THE DRAFT SEA ENVIRONMENTAL REPORT AND DRAFT NIR

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
Sea Fisheries coordination DAFM Sub 008	Ireland’s seafood industry (fishing and aquaculture) is one of the key stakeholders operating in the marine area and plays a vital role in the sustainability of our coastal communities. Over 15,000 people are employed around our coast both directly and indirectly. Many of these communities have very limited alternative employment and economic activity options. It is therefore essential that the socio-economic reliance on the seafood sector is fully recognised and is factored into any Climate Change Action plan. Fishing and food security is as key a part of Government Policy. Food Vision 2030 recognises and values the role of primary food producers.	Noted.	None	None.
	The Seafood industry is experiencing a period of difficult change, arising from the ongoing consequences of the EU UK Trade and Co-operation agreement which are specific and impactful on Ireland’s seafood sector. There is now ever-increasing demand on the marine space from Offshore Renewable Energy (ORE), Marine Spatial Planning, Marine Protected Areas (MPAs), and other environmental measures.	Noted.	None	None.
	Our coastal communities and maritime sectors will continue to play a significant	The National Climate Action Plan (2023) and Sectoral Adaptation Plans have been	None	None.

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>role in contributing to our climate goals and will continue to be consulted and supported in the transition to carbon neutrality. The seafood industry, through both the Sectoral Adaptation Plan (Agriculture, Forest and Seafood Climate Change Sectoral Adaptation Plan) and the annual Climate Action Plan (CAP23) continue to support initiatives to improve understanding of our marine area and ensure sustainable resource use, including through bio and circular economy initiatives. These plans require consideration in the SEA process.</p>	<p>considered in the SEA Process. The relationship of the Plan with other relevant Plans and Programmes has been defined in Appendix 1 of the SEA. Inter-plan cumulative effects have been evaluated in Section 7 of the Draft SEA ER.</p>		
	<p>Also for consideration in the SEA process is the European Commission’s Communication on the energy transition of the fisheries and aquaculture sector as part of its Fisheries Policy Package. This proposes the establishment of an Energy Transition Partnership (ETP) to develop a roadmap for the energy transition of the sector towards climate neutrality by 2050. The roadmap will set out investment needs, sector initiatives and inform policy decisions to help achieve this transition. The ETP is a multi-stakeholder platform intended to promote co-operation, knowledge sharing and dialogue between private and public stakeholders in order to accelerate the energy transition in the fisheries and aquaculture sector. This Partnership will help to shape the development of future transitional</p>	<p>This commentary is noted. Local authorities in Ireland do not have a direct remit over the fisheries and aquaculture sector. The actions defined in the Plan are however mutually symbiotic and harmonious with the vision and measures defined in European Commission’s Communication on the energy transition of the fisheries and aquaculture sector. Insofar as the local authority’s remit extends, the plan supports the protection and enhancement of the marine environment. The climate action defined in the plan has the potential to generate multiple climate action benefits, and co-benefits for the water and biodiversity environments and by extension the marine environment (i.e. biodiversity conservation and enhancement, coastal protection, water quality protection and improvements etc.).</p>	<p>Reference should be made to the European Commission’s Communication on the energy transition of the fisheries and aquaculture sector in Section 3.4 - <i>In-combination effects with Other Plans and Programmes</i>, and Appendix 2 - <i>Relationship with other plans and programmes</i>, as appropriate.</p>	<p>Reference should be made to the European Commission’s Communication on the energy transition of the fisheries and aquaculture sector in Section 7.3 - <i>Potential Cumulative Effect of the Draft LACAP in combination with other Plans and Projects</i>, and Appendix 1 - <i>Relationship of the Plan with other relevant Plans and</i></p>

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	actions for Ireland's seafood sector. Local authorities should include relevant steps to support a Just Transition for the sea fisheries and aquaculture sectors in their Climate Action Plans.			<i>Programmes, as appropriate.</i>
Cian O'Mahony SEA Section Office of Radiation Protection and Environmental Monitoring Environmental Protection Agency Sub 007	The SEA should also assist in identifying ways to maximise the potential co-benefits of climate-related measures for air quality, human health, biodiversity, water quality and other interrelated areas (i.e. win-win solutions).	Noted and agreed. It is noted that the Draft SEA Environmental Report (ER) has defined Environmental Governance Principles and action amendment suggestions to ensure climate action co-benefit opportunities are maximized. Various defined mitigation measures serve to promote win-win solutions.	None.	None.
	We recommend that the findings of the SEA ER and NIS are fully reflected in the Plan, to ensure that the relevant recommendations are fully considered and integrated as appropriate.	Noted and agreed. Environmental mitigation measures in the form of Environmental Governance Principles and climate action amendment suggestions have been fully integrated into the Plan itself.	None	None
	<p>Environmental Authorities Under the SEA Regulations, you should consult with:</p> <ul style="list-style-type: none"> • Environmental Protection Agency; • Minister for Housing, Local Government and Heritage; • Minister for Environment, Climate and Communications; • Minister for Agriculture, Food and the Marine. <p>If you have any queries or need further information in relation to this submission, please contact me directly at</p>	Noted. All listed Environmental Authorities have been consulted with as part of the SEA process.	None	None

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	c.omahony@epa.ie. I would be grateful if you could send an email confirming receipt of this submission to: sea@epa.ie.			
	<p>Non-Technical Summary</p> <p>You should ensure that the Non-Technical Summary includes the relevant information as required under Schedule 2 of S.I No. 435 Of 2004, as amended.</p>	The requirements of Schedule 2 of SI No 435 have been noted and amendments to the NTS will be made as appropriate.	None	Update the NTS to reflect the relevant information as required under Schedule 2 of SI No 435 of 2004 as amended.
	<p>Relationship with other plans and programmes</p> <p>We acknowledge that the Plan has been prepared taking account of the key National plans including the National Climate Action Plan 2023. We also acknowledge that the Plan sets out the key plans, programmes and policies considered in preparing the SEA.</p> <p>The Plan should include a commitment to remain aligned with high level plans and programmes, Guidelines, and legislation over its lifetime. The Climate Action Plan 2024 is currently being prepared and work will be commencing on the review of the National Planning Framework and Regional Spatial and Economic Strategies also. Any relevant updates of these plans/strategies should be integrated as appropriate into the Plan as relevant and appropriate.</p> <p>The Plan should include a commitment to consider any relevant updated actions,</p>	Noted and agreed. It is noted that this is in reference to the LACAP and not the SEA ER or AA NIR documentation.	None	None

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>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.</p>			
	<p>Strategic Environmental Objectives</p> <p>We recommend that in considering strategic environmental objectives, they should where possible reflect the plan being prepared, rather than use more generic environmental objectives. This will help both in considering more specific monitoring and mitigation measures, when required.</p>	<p>Noted. 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.</p>	<p>None</p>	<p>None</p>
	<p>Alternatives</p> <p>We note the alternatives considered in the SEA and acknowledge the preferred option selected.</p>	<p>Noted.</p>	<p>None</p>	<p>None.</p>
	<p>Mitigation Measures</p> <p>Where the potential for likely significant effects has been identified, you should provide appropriate mitigation measures to avoid or minimise these. You should</p>	<p>The SEA produced recommended a suite of mitigation measures in response to climate actions considered to have potentially significant environmental effects.</p>	<p>None</p>	<p>None.</p>

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>also ensure that the Plan includes clear commitments to implement the relevant mitigation measures.</p>	<p>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.</p> <p>Mitigation has also been achieved by the integration of environmental considerations into the defined LACAP climate actions.</p> <p>These mitigation measures have been wholly integrated into the LACAPs.</p> <p>Section 8 of the SEA ER provides full detail of these environmental mitigation measures.</p>		
	<p>Monitoring, Implementation & Reporting</p> <p>The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out</p>	<p>The SEA Monitoring Programme established for the Draft LACAP is contained in the SEA ER. This monitoring programme has been developed in accordance with EPA guidelines entitled '<i>Guidance on SEA Statements and Monitoring</i>' (2020).</p> <p>The monitoring programme is multi-faceted, broad in scope and has been designed to allow for a flexible and adaptive approach to SEA monitoring during Plan implementation.</p>	None	<p>Update the SEA monitoring programme to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects arising due to plan implementation.</p> <p>Provide additional detail on monitoring</p>

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>the various data sources, monitoring frequencies and responsibilities</p> <p>If the monitoring identifies adverse impacts during the implementation of the Plan, then you should ensure that suitable and effective remedial action is taken.</p> <p>Guidance on SEA-related monitoring is available on the EPA website at 06695-EPA-SEA-Statements-and-Monitoring-Report.pdf</p>	<p>The monitoring programme has been designed to inherently measure cumulative effects that may arise due to the implementation of the Plan.</p> <p>This plan considers both positive and negative effects, as per the following statement from the SEA text:</p> <p><i>'Where monitoring identifies that the implementation of the LACAP is having a significant negative environmental effect, an in-depth review of the LACAP should take place and the LACAP should be updated in a manner that satisfactorily mitigates these environmental effects (i.e., through the adoption of additional environmental mitigation measures.). Similarly, where monitoring indicates that potential positive environmental effects associated with LACAP implementation are not being adequately realized, the LACAP should be reviewed and updated in a manner that supports the realization of all potential positive environmental effects, having regard to the overall vision and high-level objectives of the plan.'</i></p> <p>It is noted however that additional opportunities exist in relation to monitoring the positive environmental effects of defined climate action – in connection with SEOs PHH1, L1, AQN2, TR1. The SEA monitoring programme will be updated to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring</p>		<p>programme data sources</p>

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
		<p>of positive effects arising due to plan implementation.</p> <p>The monitoring programme includes detail on the indicators, targets and data sources to be used to monitor and measure progress. Some additional detail on data sources has however been provided to better guide the SEA monitoring to be carried out across plan implementation.</p> <p>A commitment to remedial action in the event SEA monitoring shows the implementation of the Plan is having adverse environmental effects has been made in the SEA.</p>		
	<p>EPA State of the Environment Report</p> <p>Our State of Environment Report, Ireland’s Environment - An Integrated Assessment 2020 (SOER2020) identifies thirteen ‘Key Messages for Ireland’. Delivering Ireland’s long-term sustainable development and environmental objectives will involve many different stakeholders to address these key actions. The report recognises the need for full implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies.</p> <p>The EPA are currently preparing the next iteration of the SOER report, which will be published in 2024. We recommend</p>	<p>Noted.</p>	<p>None</p>	<p>None</p>

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>that a commitment is made in the Plan, to take account of any relevant recommendations in the SOER 2024 report, once published, in implementing the Plan over its lifetime.</p>			
	<p>SEA Statement – “Information on the Decision”</p> <p>Once the Plan is adopted, you should prepare an SEA Statement that summarises:</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Plan; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan; • The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the Plan. <p>You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.</p>	<p>Noted. An SEA statement will be produced and circulated to any environmental authority consulted during the SEA process.</p>	<p>None</p>	<p>None</p>
	<p>Future Amendments to the Plan</p>	<p>Noted.</p>	<p>None</p>	<p>None</p>

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>You should 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</p>			
<p>Kerry County Council (excerpts relevant to SEA and AA) Sub 004</p>	<p>Finally, it is noted that Limerick City and County Council has determined that the LACAP requires a SEA and AA.</p> <p>The Limerick LACAP is accompanied by a SEA Environmental Report and a Natura Impact Report (NIR).</p> <p>It is noted both reports have assessed the Limerick LACAP for likely significant effects on the environment and the potential for adverse effects on the integrity of European Sites. This includes an assessment further to other plans and programmes, such as those of adjoining Local Authorities, including KCC LACAP. The mitigation measures from both the SEA ER and NIR are noted and the integration of same into Limerick’s LACAP. Similarly, KCC has also undertaken a SEA and prepared a NIR. As you are probably aware, Kerry’s Draft LACAP 2024-2029 public consultation phase has now concluded, and we have moved to the next phase of the plan making process.</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>
<p>DAFM Sub 001</p>	<p>The national Climate Action Plan contains a number of actions that will reduce GHG emissions, however there will also be</p>	<p>Noted. The following Environmental Governance Principle previously defined aligns with this commentary:</p>	<p>None.</p>	<p>None.</p>

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>significant benefit to biodiversity and enhance adaptation.</p> <p>In relation to adaptation and the potential effects of climate change on Agriculture, there are a number of measures that can be applied to build resilience, many of which can also have benefits from a mitigation perspective. Maintaining a fodder reserve on farm can address the effects of longer and wetter winters as well as poorer weather conditions in spring at the start of the grazing season. The Teagasc advisory service and private Agricultural Consultants are available to provide the appropriate advice to farmers. Diversification in agricultural systems will increase resilience of farms to climate change and reduce the economic risk. Changes in climate can encourage an increase in exotic pests and diseases including invasive species - which would have a negative impact on biodiversity if measures to promote resilience are not put in place. Equally, warmer and wetter climatic conditions encourage increased disease pressure in livestock, for instance an increased prevalence of liver fluke.</p> <p>Creating further resources to harbour and restore biodiversity improve resilience to climate change. The planting of trees and forestry can contribute to carbon sequestration, and biodiversity by</p>	<p>EG2: Support or facilitate climate action related projects and initiatives which seek to make improvements in soil structure, management and health by increasing soil organic carbon - which will create the environmental co-benefits of improving flood resilience by enhancing water holding capacity of soils and increasing the level of GHG sequestration associated with land use functions.</p>		

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>providing a more diverse ecosystem to build resilience. Improvements in soil structure, management and health by increasing soil organic carbon will enhance water holding capacity beneficial for drought conditions as well as high rainfall events. Peatland restoration will also improve water holding capacity as well as water quality.</p> <p>As Local Authorities continue to finalise their 5 year Climate Action Plans, DAFM would request that the above policies, strategies and measures be taken into consideration to ensure that Ireland's reduction targets for agriculture and land use are fully supported. DAFM remains available to support Local Authorities in the development of their CAPs and other agriculture related items.</p>			
<p>Cork County Council Sub006</p>	<p>We would welcome further consultation in relation to the mitigation measures and adaptation measures proposed to be adopted in Cork County Council's Climate Action Plan.</p> <p>We note that Limerick City & County Council's Draft Climate Action Plan is accompanied by a Strategic Environmental Assessment Environmental Report and Appropriate Assessment Natura Impact Report and note the conclusions reached therein.</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>
<p>N/M 20 Cork to Limerick Project</p>	<p>A key aim of the project is to ensure it supports the mobility needs of society in</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
Sub 009	<p>a manner that is the least damaging to the environment and does not impair the mobility needs of future generations. The project will support decarbonisation of the transport network (inclusive of electrification of vehicle fleet), foster intermodality of transport use, improve air quality and reduce noise emissions in towns and villages with key health, quality of life and placemaking benefits. It will enable local opportunities for walking and cycling activity in communities with reduced traffic levels from the scheme. Environmental considerations are actively being integrated into the project planning and design through the Environmental Impact Assessment process.</p>			
<p>Inland Fisheries Ireland (IFI)</p> <p>Sub 003</p>	<p>Protection of aquatic ecosystems requires that river systems be protected on a catchment basis. The Climate Action Plan (CAP) must recognise that protection of the aquatic environment/habitat not only requires the protection of water quality but also necessitates the protection and maintenance of physical habitat and hydrological processes/regimes.</p>	<p>Noted. A robust set of environmental mitigation measures have been defined under the SEA/AA to ensure all potential environmental effects associated with Plan implementation are appropriately mitigated, including effects on the water/hydrological environment. It is recommended more express reference is made to the protection and maintenance of physical habitat and hydrological processes under Environmental Governance Principle EG6 in light of this commentary and to clarify the focus of the EG. EG6 will now read as follows:</p> <ul style="list-style-type: none"> • <i>Promote the carrying out of climate action related projects underpinned by the plan in a manner that supports climate</i> 	None.	None.

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
		<p><i>action water quality co-benefits, the achievement of Water Framework Directive objectives, and the protection and maintenance of physical habitat and hydrological processes/regimes.'</i></p>		
	<p>IFI encourages the use of soft engineering solutions are the way to sensitively increase flood reliance in a river system. Nature based solutions can involve approaches such as bank protection using tree logs, natural water retention and restoring natural river processes. Encouraging meanders in rivers will improve local flow conditions and slows water during high flow conditions.</p>	<p>The Plan promotes the use of Nature Based Solutions and Sustainable Drainage Systems as ways to promote flood resilience.</p>	<p>None.</p>	<p>None.</p>
	<p>IFI also encourage the idea of self-rehabilitation of a river system by being "left alone". By ceasing activities such as channel maintenance, this allows time for the river processes of erosion and deposition to normalise. Daylighting/deculverting of waterbodies within the county is also considered a natural method of flood management which IFI would fully support. Council commitment to reject proposals that would interfere with natural floodplains would greatly benefit both aquatic and</p>	<p>Environmental protection considerations have been appropriately integrated into flood resilience related action defined within the plan.</p> <p>Climate action defined in the Plan supports the protection and enhancement of biodiversity, including riparian buffer zones and aquatic habitat.</p>	<p>None.</p>	<p>None.</p>

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>riparian features in the surrounding areas.</p>			
	<p>Nature-based solutions should be considered from the beginning of the development planning process. Nature Based SuDS work with nature (rather than trying to control it) and are now being mainstreamed across the globe. The benefits of taking a nature-based approach includes not just flood risk management benefits, but also improved water quality, biodiversity and climate adaptation and mitigation. In terms of surface water runoff, it is always best to deal with pollutants as close to the source as possible, rather than transferring the pollution elsewhere.</p> <p>Nature-based solutions allows polluted runoff be treated close to where the rain falls and can improve the quality of surface water runoff and decrease runoff volumes. They can also help combat the adverse effects of climate change by reducing temperatures at street level in urban areas and reducing volumes of rainfall-runoff which can aid to alleviate flooding issues. The Department of Housing, local Government and Heritage have recently published the following interim guidance document on Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document, which should be</p>	<p>The Plan promotes the use of Nature Based Solutions and Sustainable Drainage Systems as ways to promote flood resilience.</p>	<p>None.</p>	<p>None.</p>

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>considered when designing drainage systems. It discusses Water Sensitive Urban Design (WSUD), which is an approach to design that delivers greater harmony between the water cycle, the environment, and communities. IFI should be consulted when resolving local flooding issues incorporating Nature Based Solutions. The CAP should include incentives and policies to enhance the uptake of Nature Based Solutions in new private developments. The multifunctional asset value of Nature Based Solutions should be laid out and the extent of the benefits provided be quantified to encourage the use.</p>			
	<p>One of the stated main objectives of the CAP is to climate proof council infrastructure. Road Drainage should ensure adequate attenuation measures are in place and silt and petrol interceptors, constructed wetlands and swales should be employed where appropriate to reduce pollutants from the road entering watercourses. However, these systems only work when they are properly maintained into the future. IFI encourages a commitment by Limerick City and County Council that all roads and pipelines are constructed in such a manner so as not to pose a threat to surface waters either through pollution, loss of fisheries habitat or through interference with the passage of migratory fish species and/or spawning</p>	<p>At policy level, the Plan supports the protection of the water environment from development and activities supported by defined climate action.</p> <p>Several Environmental Governance Principles have been defined in the Plan which promote environmental protection and enhancement, including biodiversity conservation and water quality protection and improvement.</p> <p>Environmental protection considerations have been appropriately integrated into transport, flood and drainage related development and infrastructure maintenance related action defined in the Plan.</p>	None.	None.

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>beds. The impacts of poorly designed river/stream crossing structures can be serious in terms of habitat loss. Prevention of the free upstream migration of fish species such as Salmon, Trout and Lamprey effectively results in the loss of spawning habitat upstream of the barrier to migration. This could have serious implications for the populations of fish species concerned and contravenes the legal obligation under the WFD to protect the ecological status of river catchments and channels. When structures are being designed for crossing fisheries waters, consideration must be given to the following biological criteria: species of fish required to safely pass; size of fish required to pass (life stage); time of year in which fish passage is required; and, high and low design passage flows etc. Bridges and bottomless culverts have the least impact on fish passage. IFI recommends that the CAP should include a clear policy on the use of clear span structures on fisheries waters and that IFI should be consulted on any such proposed developments.</p>			
	<p>There is a zone of influence associated with Greenways/Blueways and these must be considered and planned for in the CAP when promoting active travel.</p>	<p>The Plan supports the protection and enhancement of the biodiversity and water environments from development and activities supported by defined climate action.</p> <p>Several Environmental Governance Principles have been defined in the Plan</p>	<p>None.</p>	<p>None.</p>

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
		<p>which promote environmental protection and enhancement, including biodiversity conservation and water quality protection and improvement.</p> <p>Environmental protection considerations have been appropriately integrated into Green Infrastructure development related action defined in the Plan.</p> <p>The Plan promotes the use of Nature Based Solutions and Sustainable Drainage Systems as ways to promote flood resilience.</p> <p>It is noted that SEA Monitoring Framework for the LACAP includes the following Plan target:</p> <ul style="list-style-type: none"> • Increase linear metres of riparian corridor enhanced with native planting. 		
	<p>A wildlife corridor system that protects regional diversity should be at the forefront of the Greenway/Blueway planning processes. Fragmentation can occur along riparian corridors if proper planning is not in place. In considering wildlife, the focus should not be solely on the narrow width of the path of the greenway, consider the wider area it may influence such as allowing invasive plant and animal species to spread more easily</p>	<p>The Plan supports the protection and enhancement of the biodiversity and water environments from development and activities supported by defined climate action.</p> <p>Several Environmental Governance Principles have been defined in the Plan which promote environmental protection and enhancement, including biodiversity conservation and water quality protection and improvement.</p>	None.	None.

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>along the corridor and outcompeting native species.</p>	<p>Environmental protection considerations have been appropriately integrated into Green Infrastructure development related action defined in the Plan.</p> <p>The Plan promotes the use of Nature Based Solutions and Sustainable Drainage Systems as ways to promote flood resilience.</p> <p>Plan is underpinned by the need to prevent invasive species spread. See EG9, as follows:</p> <p><i>EG9: '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.'</i></p>		
<p>The Department of Housing, Local Government and Heritage Sub013</p>	<p>Archaeology and Built Heritage</p> <p>The Department of Housing, Local Government and Heritage welcomes the publication of local authority draft Climate Change Adaptation Strategy. The Department draws your attention to the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) prepared as part of the National Adaptation Framework. The Climate Change Sectoral Adaptation Plan (CCSAP) identifies the priority impacts for the built</p>	<p>Noted.</p>	<p>Reference should be made to the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) in Section 3.4 - <i>In-combination effects with Other Plans and Programmes</i>, and Appendix 2 - <i>Relationship with other plans and</i></p>	<p>Reference should be made to the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) in Section 7.3 - <i>Potential Cumulative Effect of the Draft LACAP in combination with other Plans and Projects</i>, and</p>

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	and archaeological heritage based on current climate change projections.		<i>programmes, as appropriate.</i>	Appendix 1 - <i>Relationship of the Plan with other relevant Plans and Programmes, as appropriate.</i>
	The Heritage Division of the Department (National Monuments Service and National Built Heritage Service) is engaged with the local authorities through the departmental Climate Change Advisory Group and established Working Groups to ensure a consistent approach to protection and adaptation of heritage assets across the country and an alignment of policies, plans and actions across national, regional and local climate action. The Department anticipates ongoing engagement with the local authorities throughout the implementation of current and future sectoral adaptation plans.	Noted.	None.	None.
	In the preparation and implementation of the local authority adaptation strategy, there are a number of issues regarding protection of built and archaeological heritage that the Department recommends be taken into account to identify the heritage assets at risk in its area, assess their vulnerability to climate change, increase their resilience and develop disaster risk reduction policies for direct and indirect risks. For example,	Noted.	None.	None.

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	it is recommended that the strategies should consider:			
	<ul style="list-style-type: none"> Identifying the built and archaeological heritage assets in the local authority area including, but not restricted to, structures and sites subject to statutory protection under the National Monuments Acts 1930 to 2014, or the Planning and Development Acts. 	The SEA scoping report and SEA Environmental Report identify the built and archaeological heritage assets in the LA including structures and sites subject to statutory protection under the National Monuments Acts 1930 to 2014, and the Planning and Development Act (as amended). Exhaustive detail on built and archaeological heritage is held on record by the local authority and provided in the Country Development Plan already.	None.	None.
	<ul style="list-style-type: none"> Including objectives to carry out climate change risk assessments, including condition assessments, for the historic structures and sites in its area 	Plan Action 1.7.1 is as follows: Continue a Climate Change Risk Assessment & Adaptation Assessment approach of local-authority owned heritage sites	None.	None.
	<ul style="list-style-type: none"> Including objectives to develop disaster-risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area 	Noted. The Plan defines actions that will serve to minimize and manage climate related disaster risk (e.g., flood risk) and improve the climate resilience of architectural and archaeological heritage.	None.	None.
	<ul style="list-style-type: none"> Including objectives to develop resilience and adaptation strategies for the built and archaeological heritage in its area. 	Noted. The Plan defines actions that will improve the climate resilience of architectural and archaeological heritage.	None.	None.
	<ul style="list-style-type: none"> Developing the skills capacity within the local authority to address adaptation/mitigation/emergency management issues affecting 	Noted.	None.	None.

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>heritage assets in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works.</p>			
	<p>The Department will shortly be publishing a new guidance document Improving Energy Efficiency in Traditional Buildings. This guidance will assist retrofitting installers and specifiers in how best to choose and apply energy efficiency measures to the historic building stock. The guidance is also intended to assist building owners and occupants in making decisions about upgrading their buildings, many of which are of architectural heritage significance. It is recommended that all proposed retrofitting projects undertaken or supported by the local authority to buildings of traditional construction should follow the principles and practice set out in that guidance</p>	<p>Noted. The SEA Environmental Report has defined mitigation measures within the plan to ensure that any retrofitting of buildings including protected structures is carried out in a manner that doesn't impinge on built heritage or protected structures.</p>	<p>None.</p>	<p>None</p>
	<p>Finally, it is recommended that, where such officers are employed, the Architectural Conservation Officer, Heritage Officer and Archaeologist should be included on the local authority's Adaptation Steering Group.</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>
	<p>You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: referrals@npws.gov.ie</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>

APPROPRIATE ASSESSMENT FINAL DETERMINATION

Local Authority Climate Action Plan 2024 – 2028 for the Limerick City and County Council functional area

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

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

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

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

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

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

Modifications to the Draft LACAP were made following a review of the issues raised during a period of prescribed public consultation period for the Draft LACAP from 22 December 2024 to 5 February 2024 and subsequent consideration by Limerick City and County Council. 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, Limerick City and County Council 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. An AA Screening Determination was made in relation to this effect.

Overall, the AA process concluded the following:

- Stage 1 AA Screening and Stage 2 AA of the Limerick City and County Council Local Authority Climate Action Plan 2024-2029 has been carried out. Implementation of the LACAP has the potential to result in effects to the integrity of any European sites, if unmitigated.
- The risks to the safeguarding and integrity of the qualifying interests, special conservation interests and conservation objectives of the European sites have been addressed by the inclusion of mitigation measures that will prioritise the avoidance of effects in the first place and mitigate effects where these cannot be avoided. In addition, all lower-level plans and projects arising through the implementation of the LACAP will themselves be subject to AA when further details of design and location are known.

- In-combination effects from interactions with other plans and projects was considered in the assessment and the mitigation measures incorporated into the plan are seen to be robust to ensure there will be no significant adverse effects as a result of the implementation of the LACAP either alone or in-combination with other plans/projects.
- Having incorporated mitigation measures, it is concluded that the Limerick City and County Council LACAP 2024- 2029 is not foreseen to give rise to any significant adverse effects on designated European sites, alone or in combination with other plans or projects. This evaluation is made in view of the conservation objectives of the habitats or species, for which these sites have been designated

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

STRATEGIC ENVIRONMENTAL ASSESSMENT SCREEN DETERMINATION

Modifications to the Draft Local Authority Climate Action Plan 2024 – 2029 for the Limerick City and 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

Limerick City and County Council has prepared a Draft Local Authority Climate Action Plan (LACAP) for the Limerick City and 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 Limerick City and 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 22 December 2023 to 5 February 2024 and subsequent consideration by Limerick City and County Council.

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

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

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

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

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

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

SECTION D

PROPOSED CHANGES TO THE DRAFT LACAP

In response to the submissions received, the following changes are proposed to the draft plan:

1. Section 4.2.5.1

To support an increase in renewable energy sources across the county LCCC will prepare a Renewable Energy Strategy for the county that will include wind, solar, integrated renewables as well as District Heating, **Green Hydrogen**, and Anaerobic Digestion- **including Bio Compressed Natural Gas**.

2. Section 4.6 (pg 42)

At a national level, the Waste Action Plan for a Circular Economy 2020–2025 [45] set the scene for our transition from waste disposal to preserving resources in a circular economy. Policy is further strengthened by Ireland’s first national circular economy strategy, the ‘Whole of Government Circular Economy Strategy 2020-2023’, and the pending 'National Waste Management Plan for a Circular Economy 2023-2029'. **Regard will also be had to “Irelands Draft National Biomethane Strategy Jan 2024.”**

3. Section 6.1

Limerick City and County Council has a close working relationship with the third level education sector in the County exemplified by the development of the Citizen Innovation Lab as part of the +CxC project on the UL City centre campus. These partnerships will greatly support the delivery of this plan.

“Limerick City and County Council will continue to review the plan to ensure it is fully aligned to relevant national strategies and guidelines”.

4. SECTION 6.3.4

“Ensure that the mitigation measures outlined in Section 8 of the SEA Environmental Report are implemented in the course of implementing this plan.

Other Amendments Proposed as a Result of Errors in Drafting:

1. Section 4.3.1

Addressing these challenges is something that is going to take time. fleet strategy is required to set out the roadmap to decarbonize the fleet and ensure the 2030 emission targets are met, through the approach of Avoid- Shift- Improve, as illustrated in Figure ~~xxx~~**4.2**

2. Section 4.7.1

These initiatives will continue to be delivered with the impact being increased through several different actions (figure ~~xx~~**4.5**)

3. Fig 5.1 pg 47

To be amended to include the full extent of the LDA masterplan i.e. St. Joseph's Hospital



Map as included in the draft LACAP



Proposed new map including the additional lands at St. Josephs.

APPENDIX 1

COPY OF THE PUBLIC NOTICE



Comhairle Cathrach
& Contae Luimnigh

Limerick City
& County Council

PUBLIC NOTICE

NOTICE OF THE MAKING OF THE LIMERICK LOCAL AUTHORITY CLIMATE ACTION PLAN 2024-2029

Notice is hereby given, pursuant to the provisions of the Climate Acts 2015-2021; Section 16 of the Amendment Act 2021 amending the Principal Act of 2015 by the insertion of Section 14B, that Limerick City and County Council has prepared a Draft Limerick Local Authority Climate Action Plan 2024-2029 (hereinafter referred to as the 'Draft Climate Action Plan') for the functional area of the Council.

The Draft LACAP 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 with associated Environmental Report and Natura Impact Report will be available to view online on Limerick City and County Council's website at <https://mypoint.limerick.ie/> from December 23rd and may also be inspected during normal opening hours at the following locations:

- City Hall, Merchants Quay.
- County Hall, Dooradoyle.
- Kilmallock Area Office.
- Rathkeale Area Office.
- Newcastle west Area office
- Public libraries in during opening hours.

Submission/Observations

Limerick City and County Council hereby invites any interested parties to make submissions or observations with regard to the Draft Climate Action Plan. Submissions/observations may be made during the period from 23rd December 2023 to 5th February 2024 inclusive. Submissions received will be taken into consideration before the making of the Climate Action Plan. In respect of making a submission or observation please, note the following:

- Please make your submission by one medium only i.e., via on-line form, email or by post. This will avoid the duplication of submission reference numbers and will streamline the process.
- Submissions/observations should include your name and, where relevant, details of any organisation, community group or company etc., which you represent. Limerick City and County Council is subject to the provisions of the Data Protection Act (as amended) and General Data Protection Regulation (GDPR). In order to assist us in complying with Data Protection and GDPR please include your name and where relevant, details of any organisation, community group or company etc., which you represent. This processing of your personal data is lawful under Article 6 (1) (e) of the GDPR regulations. The Council's Data Protection Policy is available on the Council website and a Data Protection Privacy Notice for the Draft Climate Action Plan Public Consultation can be viewed on <https://mypoint.limerick.ie/>
- Children, or groups or associations representing the interests of children, are particularly encouraged to make submissions or observations regarding the foregoing.
- 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. Limerick City and County Council reserves the right to redact any submission or part thereof that does not comply with this requirement.

A submission/observation can be submitted by one of the following methods:

Online: Online via the Councils Public Consultation Portal at <https://mypoint.limerick.ie/>

In writing to: Draft Climate Action Plan, Climate Action Department, Limerick City and County Council, City Hall Merchants Quay, Limerick

By email to: climateaction@limerick.ie. Subject headline should read "Submission to Draft Limerick Local Authority Climate Action Plan 2024-2029".

The deadline for receipt of submissions is 5th February 2024. Please note late submissions will not be considered.

Public Information Drop-in Events

Council staff will be available during the hours 5.00pm to 7.00pm for the following locations and dates to provide guidance on the Draft Climate Action Plan and on the consultation process:

Location	Time
Kilmallock	18th January 6 pm - 8 pm
Newcastle West	16th January 5 pm - 7 pm
Rathkeale	17th January 3pm - 5pm
City Library	23rd January 5 pm - 7 pm

If you have any queries or require more detail, please contact the Climate Action Section by email at: climateaction@limerick.ie

Signed
Vincent Murray
Director of Service
Planning Environment and Place making Directorate