

# **Appendix 1**

## **Consideration of Submissions Received**

**Sub No. 1: Gas Networks Ireland**

**Summary of issues raised:**

- Gas Networks Ireland's infrastructure is underground and designed to avoid flood risk is more resilient to climate change than other energy transport infrastructure such as oil and electricity.
- The infrastructure is designed to avoid impact on biodiversity.
- Renewable gas could create jobs in rural areas and also benefit agriculture.
- They believe renewable gas is the least cost method to decarbonise home heating while using existing infrastructure.
- Consideration requested for the role renewable gas and compressed natural gas CNG can play in reducing carbon emissions.
- Consider supporting anaerobic digestion plants, CNG refuelling stations and renewable gas injection points to help establish these technologies in the region

**Response to issues raised in submission:**

Energy policy and supply in Wicklow for transport and home heating should be guided by accepted best practice at national level, favouring the most carbon neutral sources available, with account taken of cost to end users. The County Development Plan contains a chapter on Climate Change and Energy. Consideration should be given in this chapter to all developing technologies for energy generation, particularly where there are opportunities to incorporate more localized resilient solutions that will decarbonise energy supply and create local jobs in the process.

**Recommendation:**

**This submission should be addressed through Theme 3, Action 1 which will identify and integrate climate change as a critical consideration and guiding principle informing all plans, strategies and policies prepared by the council including the core strategy of the County Development Plan and also through Theme 3, Action 4 to research and incorporate in the content of the County Development Plan, measures in accordance with Section 10 of the Planning and Development Acts 2000 (as amended).**

**Sub No. 2: DAFM**

**Summary of issues raised:**

- The DAFM would like to highlight the impact Climate Change will have on agriculture particularly freshwater aquaculture and on seafood related infrastructure.
- Several areas of overlapping interest including wildfires, slurry spreading, soil quality and non native species are documented.
- It states that there are complex issues faced from an agriculture/forestry/marine viewpoint and it is noted that farmers as significant landowners in the county who and that a lot of adaptation/mitigation measures will be influenced or managed by this group.
- The strategy need to instil a sense of ownership/inclusion from this sector in the strategy.
- The baseline assessment of vulnerabilities does not address agriculture.

**Response to issues raised in submission:**

The sectoral strategy by DAFM is the appropriate vehicle for assessing vulnerabilities in agricultural but is important that we get a better understanding of those vulnerabilities as they pertain to County Wicklow. Wicklow County Council agrees with DAFM that we have overlapping interests, that the farming community, Coillte, the NPWS and landowners will be key partners in delivering adaptation and mitigation measures, and that we will need to engage and work more closely with this sector in order to strengthen our capacity to protect resources for all in County Wicklow. An action to facilitate this should be incorporated to the plan under Theme 6 Community Health and Well Being. *Action 6. 11: Develop a steering group to explore and develop common goals and objectives between Wicklow County Council and representatives from the farming, forestry, the NPWS and landowners in rural and upland areas of the county.*

**Recommendation:**

**Wicklow County Council should explore developing a mechanism to strengthen our combined response to Climate Change either through existing bodies such as the Wicklow Uplands Council or through the establishment of a new steering group. The mechanism should aim to document vulnerabilities pertaining specifically to the sector in County Wicklow, develop common goals, objectives and actions and work to ensure share concerns are addressed and opportunities are taken up. *Action 6. Xx: Develop a steering group to explore and develop common goals and objectives between Wicklow County Council and representatives from the farming, forestry, the NPWS and landowners in rural and upland areas of the county.***

**Sub No. 3:     The Bray Heads University of the Third Age Climate Action Sub-group**

**Summary of issues raised:**

- Wicklow County Council having declared a Climate emergency needs to move rapidly from adaptation to focusing on mitigation and the implementation of actions that will make a difference to our communities including planning, retrofitting of buildings, increasing penalties and enforcement for environmental damage which should include felling of mature trees and illegal dumping.
- In transitioning to a low carbon economy it is critical to consider climate justice so that those most vulnerable are protected.
- It is a concern that key actions do not have a budget and that key indicators have yet to be developed both of which could lead to the plan being aspirational. Budgets and firm timelines are needed.
- Concern that the theme of Community, Health and Wellbeing is not fully developed given that Climate adaptation requires all to make change. They would like to see Wicklow County Council taking a leadership role, facilitating public engagement and active participation.
- Given the role the younger generation have played in demanding climate action and action on biodiversity loss they would like to see Wicklow County Council work on further developing Green Schools.

**Response to issues raised in submission:**

It is clear that there is strong support throughout the county for Wicklow County Council to also address mitigation. Mitigation measures are already a part of many work programmes and the Climate Action plan published by the government assigns further actions to local government and also will shift focus in many policy and economic development areas towards mitigation. Wicklow County Council will soon have to develop further actions in this area. It is important that the adaptation strategy recognizes the purpose of the Climate Action Plan and the role intended for Local Authorities to meet targets and contribute to the national climate ambition. Wicklow County Council will include an action to reflect this. *Action 1.20 Assess the range of and scope of existing mitigation measures already undertaken by Wicklow County Council and those that will be required under the Climate Action Plan.*

In budgeting for this strategy we have identified actions that can be covered under existing budgets and where further funding will be required going forward. Finalising when money will be allocated will need to take place at a later stage as part of budget preparation for 2020 and beyond. Theme 1, Action 5 does require the development of service indicators for adaptation measures. We will work with CARO the regional office to develop key indicators looking to incorporate some that will be common to all local authorities to allow comparison and also where needed some which may be specific to Wicklow. Timelines currently look at short medium and long term. Once a SPC has been fully established, budget decisions have been made and Climate Action Officer recruited we can start to clarify dates for implementation of actions.

Facilitating public engagement and action will be achieved through a number of different channels including Environmental Awareness, the Public Participation Network, Community and Economic development, Municipal District Offices and the Local Enterprise Office.

An Taisce are developing a new Climate Action programme within Green Schools building on their Climate Ambassador programme. Wicklow County Council will support the roll out of this programme. The Environmental Awareness Office undertakes activities, workshops, seminars and competitions tailored to help schools explore the environment as part of the curriculum and will continue to develop unique projects to assist schools address awareness on Climate Change. An action will be added to Theme 6 on education in schools, 6. 12 Support the delivery of Climate Action Awareness and education in County Wicklow schools through Green Schools and associated Environmental Awareness initiatives.

**Recommendation:**

**An action to scope existing mitigation measures and those that may arise from the Climate Action Plan will be useful to allow the SPC to address this end of Climate Action. An action will be added to build on adaptation planning and incorporate implementation of actions relevant to local authorities in the Climate Action Plan. *Action 1.20 Assess the range of and scope of existing mitigation measures already undertaken by Wicklow County Council and those that will be required under the Climate Action Plan.***

**An action to support continued development of awareness on Climate Action through Green Schools within Wicklow schools will be added : 6. 12 Support the delivery of Climate Action Awareness and education in County Wicklow schools through Green Schools and associated Environmental Awareness initiatives.**

**Sub No. 4:      Public Participation Network**

**Summary of issues raised:**

- Climate migration not considered in the policy.
- Disappointment was expressed that mitigation is not addressed more fully in the strategy with participants want to see a mitigation strategy developed to match the adaptation strategy. They would like to see more emphasis on what Wicklow will do to implement mitigation measures at community level such as through the Sustainable Energy Communities Programme. It was suggested that Wicklow County Council should investigate and document all current mitigation measures with a view to identifying gaps and develop a plan.
- Concern was expressed that the language used is difficult, that there is repetition in risks, and that actions are broad and it will be difficult to evaluate and measure output.
- Concern was expressed that the programme put the economy before people and the environment. It was felt that the plan needs measurable outcomes including targets and indicators.
- Concern was expressed about sourcing weather data through Climate Ireland and Met Eireann with a suggestion that local weather stations be used going forward.

- Concern were expressed that key sectors including afforestation, the marine environment and more widely biodiversity are not adequately addressed by this strategy while recognised that they are addressed in separate adaptation strategies produced by appropriate bodies. It was suggest that Wicklow County Council works collaboratively with these strategies and takes a lead at local level to ensure implementation.
- Members of the PPN expressed concern about historical planning decisions and felt that the national guidelines have fallen short. The County Development Plan should follow international best practice leading to resilient communities with transparent accountable and environmentally sustainable decision making.
- Knowledge and skills needed across all sectors to encourage better Climate Action. Training needed for elected representatives and staff to deepen understanding of risks and measures required. Wicklow County Council should work with local experts and communities to insure local input into developing resilient communities. Role of Green Schools noted.
- Concerns about whether plan would be fully implemented and have full reach across the organisation with good communication on all measures to ensure implementation. The PPN would like to see leadership by the Chief Executive with annual auditing and review. The Climate Action Officer should ensure the strategy is at the forefront of every service plan and policy. There needs to be an active role for the new SPC and the PPN requests at least two seats on the SPC, ideally five, one to represent each municipal district.

#### **Response to issues raised in submission:**

An action to scope existing mitigation measures and those that may arise from the Climate Action Plan will be useful to allow the SPC to address this end of Climate Action This has been added above under a previous submission. *Action 1.20 Assess the range of and scope of existing mitigation measures already undertaken by Wicklow County Council and those that will be required under the Climate Action Plan.*

It is acknowledge that the language in the strategy is often challenging but this is often down to a need for precision. When communicating Climate Action going forward it will need to be done in a user friendly clear and simple manner. It is proposed to extend the executive summary giving more detail in user friendly English.

Vulnerability and risk recurred across different themes. It was important to note where they affected a range of functions or services and be mindful of them in tailoring actions under individual themes. This is why repetition of risk occurred in the document.

It is the intent of this strategy to consider all aspects of sustainable development in adaptation to Climate Change. Protection of the environment, society and the economy must all be given appropriate consideration throughout the strategy.

Weather forecasting and reporting gathers data from a range of technologies and equipment, combining information from multiple sources to build a better picture of events. Individual locations will have limited sets of equipment and technology and will catch a limited snapshot of weather events. Met Eireann and Climate Ireland can better capture what is occurring in weather events using all available

data sets which can include satellite information and offshore monitoring stations as well as regional and local stations. They will give a better analysis than can be achieved just using local stations. Local data sources will be used as appropriate to measure and report on more localised events including data from local stations and flow measurement in water bodies.

Wicklow County Council will work with partner organisation to ensure a coordinated approach to Climate Adaptation in County Wicklow. In some sectors it will be appropriate for Wicklow County Council to take a lead, in others it may be another organisation who takes the lead. To ensure a coordinated approach Wicklow County Council will add an action requiring consultation by the Climate Action Officer with the relevant authorities through the National Action framework.

Wicklow County Council recognises the important role the County Development Plan will play in delivering climate adaptation. Wicklow County Council will be proactive in seeking to lead with best practice going beyond guidelines where feasible options have been demonstrated. Action 3.1. should be amended to include the aim to achieve best practice going beyond guidelines where feasible and appropriate.

Action 1.7 incorporates the running of awareness campaigns on Climate Change in its programme but we recognise from the PPN submission that there is a case for developing a specific action for a programme of awareness and training for elected representatives, staff and communities on the role we play and how it will be achieved in addressing Climate Action. A new action to develop training should be added. Action 1.21 *Develop and deliver training and awareness campaigns for staff, elected representatives and communities on Climate Action.*

Action 1.5 does require the development of service indicators for adaptation measures. As mentioned previously we will work with CARO, the regional office to develop key indicators looking to incorporate some that will be common to all local authorities to allow cross comparison and also where needed some which may be specific to Wicklow. Action 1.4 requires the incorporation of Climate Adaptation into the service delivery programme which will allow for setting and monitoring of targets across the organisation at team and individual staff levels.

An action on Green Schools has already been suggested above. 6. 12 Support the delivery of Climate Action Awareness and education in County Wicklow schools through Green Schools and associated Environmental Awareness initiatives.

**Recommendation:**

**Mitigation has already been discussed and an action will be developed to scope current actions, and actions required through the Climate Action Plan.**

**Wicklow County Council will need to do further work communicating the message of Climate Adaptation. The executive summary will be extended to include more information in user friendly English.**

**Action 3.1 should be amended to the following: *Identify and integrate climate change as a critical consideration and guiding principle informing core strategy of the County Development Plan, Local Area Plans and Heritage Plan incorporating best practice as a guiding principle where feasible and appropriate.***

**Action 1.21 *Develop and deliver training and awareness campaigns for staff, elected representatives and communities on Climate Action* will be added.**

**Further work will be needed on developing indicators, which should be measurable and comparable with other local authorities. CARO and the SPC on Climate Action and Biodiversity will play a key role in monitoring progress.**

**Sub No. 5:      **The Green Party****

**Summary of issues raised:**

- There is misperception in public on the scope and remit of the strategy. The document should clearly state its focus on adaptation and its focus on the provision of Wicklow County Council services
- The strategy should demonstrate how it already incorporates mitigation into its services.
- The document should set out timelines, funding requirements and priorities.
- Public awareness is key and the strategy should engage community groups and specifically youth.
- A more complex risk assessment which looks at the effect of cumulative impacts over time and the interaction between impacts and events is requested.
- A more specific timeline with measurable goals assigned is requested.
- Commit to using CEM III cement in all local authority projects and PPPs (1.0).
- In order to ensure the successful implementation of this Climate Adaptation plan, specific timelines for actions must be agreed with a 6 monthly progress report on actions (Objective 1.1).
- Introducing remote working days option, where practicable for staff to eliminate commuting on these days. (Objective 1.15).
- Seek funding through SEAI and DCCAIE to install an energy monitor in every home in Wicklow (1.7).
- Seek increased budget from DHPLG to energy retrofit all local authority houses. (2.1).
- Allow 25% of transport budget for cycling infrastructure and for pedestrian infrastructure to improve the safety of that infrastructure and encourage further take up in active travel, reducing car dependency, congestion and transport emissions (2.3).
- Commit to making all existing and new cycle paths raised or segregated. Investigate methods such as providing linear rumble strips (rumble bars), physical segregation



barriers, raised road markings to further improve road safety and offer protection to cyclists and visual and tactile information for motorists (2.3).

- Provide 10% of the number of on street public parking spaces in town centres in bicycle spaces/racks (for example if there are 500 on street parking spaces, then provide 50 bike spaces/ racks) (2.3).
- Adopt footpath repair methods in urban areas that can allow tree root expansion rather than removing healthy trees (for example high density rubber matting surrounds) (2.3).
- Introduce free parking for an agreed period for EV's (2.3).
- Implement 30kph slow zones in all town centres and their approach roads for a 300 metre radius from town centre or variant depending on town layouts (2.3).
- Through development standards, increase the required capacity of all surface water drainage systems in future developments and provision of attenuation tanks (2.3, 4.2).
- Work with SEAI and ESB to provide throughout Co Wicklow, EV charging points at public lighting poles and commence the roll out of EV charging points in Greystones (2.3).
- Work with NTA to identify pinch points where the removal of some on street parking would provide for safer cycling and pedestrian use and more reliable and punctual public transport services (2.3).
- Allow wild growth verges along roadways (subject to maintaining safe sight lines) and wildflower planting on roundabouts (Objective 2.3).
- Increase buffer zones for development from water courses and coastal waters. Apply a more precautionary approach to flood risk analysis in land zoning than that provided for in OPW historical flooding maps (2.4).
- Carry out a feasibility study on provision of domestic rain water harvesting or grey water systems for local authority developments (3.1).
- Require planning applications for any multi unit development to provide a route map showing safe cycling and walking routes to school, shops and public transport. (3.1).
- Ensure through development standards that multi unit developments provide adequate on street EV charging points and that ground floor units are provided with external charge points.
- Estimate the carbon footprint of construction stage and life cycle of local authority projects in terms of energy and transport use prior to decisions to proceed with such projects. (3.2, 3.4).
- Provide in the Development Contribution Scheme, in surface water management section, for upstream soft engineering solutions to mitigate downstream flooding (3.3).
- Create Tree Preservation Orders in all urban areas (3.3, 3.5, 5.1).
- Produce a tree management strategy and provide annual details on the number of trees removed and replanted by each MD (3.3, 3.5, and 3.1).

- Adopt an ongoing intensive clearing and repair scheme for gullies and drains through residential areas and ensure MDs are sufficiently funded to carry out this maintenance (4.1).
- Identify and map suitable public areas for native tree planting in order to support native tree cover with the aim of increasing Wicklow's forestry cover to meet national targets. Carry out an arborist led review of trees within urban areas to identify candidate trees (individual and groups) suitable for Tree Protection Orders. (Objective 5.1).
- Commit all municipal districts to develop and implement a pollinator plan with support actions in line with All Ireland Pollinator Plan (5.3).
- Provide an assessment of the status/threats to blanket bog and wetland habitats. Identification and mapping of natural areas for rewilding. (5.5).
- Commit to once per year, inviting a climatologist/climate academic to present to full council.
- Consider a rate reduction for energy efficiency improvement scheme for businesses (business should carry out an energy audit, with recommendations).
- Commit to a 20% increase in urban tree planting.
- Commit to investing in Harbour protection schemes.
- Identify a location in each town for casual trading farmers/local markets.
- Provide a business case and seek funding for a;
  - landscape architect
  - County Architect
  - Biodiversity Officer
  - Arborist
- Proceed with solar car port plan and consider a photo-voltaic roof for county buildings to support objective 1.14 (electric vehicle fleet) and to feed into building energy demand (Wicklow Co Co has just over 10 years to achieve the national target of 33% energy efficiency improvement for public bodies. SEAI recently credited Wicklow Co Co at 11.3%).
- Convene community flood response volunteer groups (use BTC River Dargle 2008 model).
- Wicklow Co Co shall become a signatory to the EU Covenant of Mayors for Climate and Energy to demonstrate commitment in this area.
- Representatives from the Climate and Biodiversity Action SPC to sit on the proposed Climate Action Steering Group.

**Response to issues raised in submission:**

While the strategy is clear in the scope and nature of its remit, it is a large document and contains technical language that can be difficult for members of the public. The place to reinforce the message about the scope and remit of the strategy is in the executive summary where it could be further highlighted. The summary will be extended to clarify its function.

Incorporating existing mitigation measures into the existing strategy without substantial review would be challenging in the time frame for delivery and would also need to look at evolving policy. The strategy will be amended to take account of the Climate Action Plan which will broaden and strengthen the remit of Wicklow County Council in taking action on climate in addition to the focus here on adaptation. An action to scope existing mitigation measures and those that may arise from the Climate Action Plan will be useful to allow the SPC to address this end of Climate Action giving a baseline for development.

*Action 1.20 Assess the range of and scope of existing mitigation measures already undertaken by Wicklow County Council and those that will be required under the Climate Action Plan.* This action has already been added in response to a submission.

Timelines and funding have been projected based on available information and priority. Action 1.5 does require the development of service indicators for adaptation measures. Budgeting, resources, and timeframes for review of other policies and plans will play a key role in shaping delivery. Key factors will include the recruitment of a Climate Action Officer, the establishment of both the steering group and the SPC. It should then be feasible for the development of a precise timescale with indicators by early 2020 allowing for full consultation with relevant services, budgeting and allocation of resources. Wicklow County Council will put in text clarifying time frames in terms of what short, medium and long mean in the implementation chapter of the strategy.

It is agreed that public awareness is key to success in delivering success on Climate Action and noted that youth have played a key role in demanding action but also more importantly in implementing action. Wicklow County Council will seek to build on its work with communities and schools through this strategy. There are actions already in the plan which address public participation on the overall issue as well as in the suite of measures that will assist us to take action including on the circular economy, transport, business development, community grants and work with the PPN. Further actions are being added to reflect interests expressed in submissions. Wicklow County Council will build on strong working relationships with community groups such as Tidy Towns, Residents Associations, Coastcare, Green Schools and the PURE Mile.

The methodology used for assessing risk was one set by CARO following consultation with academic advisors. It is a methodology common to all local authorities and allows for cross comparison between local authorities and across sectors. Changing the methodology at this point would not be appropriate. The submission does raise important questions about how cumulative impacts will affect strategic planning going forward. The submission will be brought to the attention of CARO requesting that research is done on assessing cumulative impacts so that it can be better measured in time for the review of strategic plans in 2024.

CEMIII cement is a green procurement initiative. The Climate Action Plan commits local authorities to delivering a green procurement approach which incorporates carbon pricing and climate criteria. While largely a mitigation measure it worth looking at Green procurement as an overarching measure and

including it as a new action. *Action 1.22 Develop a Green Procurement strategy for the organisation which will stipulate where specific conditions are to be assessed prior to procurement.*

Timelines are discussed above. The Climate Action Steering Group will monitor implementation, consulting with the SPC on progress.

The introduction of remote working days is a measure that should be considered as a follow up measure to the staff commuting survey in Action 1.15. This action can be augmented to include a range of potential outcomes including remote working days, public transport, cycling or walking promotion. Council office space in other locations could offer opportunity for remote working. *Action 1.15 Undertake a staff commuter survey with result used to assess the feasibility of remote working days, or promotion of car pooling or cycling and walking to work.*

The installation of an energy monitor in all homes is something that is considered through smart metering in the Climate Action Plan. There is a programme underway already and being rolled out by ESB networks.

The retrofitting of all local authority homes is included under the Climate Action Plan. Wicklow County Council will pursue implementation of this action subject to funding.

Issues relating to transport including cycling, footpaths, public transports and reducing dependence on cars should be dealt with in a coordinated manner allowing for better prioritisation in spending. A new action will be added to develop a more coordinated approach. *Action 2.9 Develop a Sustainable Transport Plan which will address public transport, cycling and pedestrian infrastructure, measures to reduce car dependence and measures to reduce carbon emissions from car transport.*

Footpath repair methods incorporating rubber mats should be addressed through the tree policy in 5.4 rather than in 2.3. as this policy aims to address planting and maintenance issues which can affect the durability of trees.

The issues of parking for EV's and 30KPH slow zones should be addressed through the Sustainable Transport Plan.

Attenuation capacity is addressed by Action 4.2.

Wicklow County Council will continue to work with SEAI and ESB networks to enable provision of EV charging points throughout the whole county. This action is more a mitigation measure and is adequately covered in the Climate Action Plan.

Identifying pinch points where removal of street parking would provide safer cycling and pedestrian routes should be considered in the above Sustainable Transport Policy.

Wild verges on our roadways and wild flower planting on roundabouts should be addressed through Action 5.5 in the review of the Biodiversity Action Plan rather than in Action 2.3.

Buffer zones on riparian sites and in coastal zones are being addressed through the River Basin Management Plan for waterways and for coastal zones in the coastal zone management section of the County Development Plan.

The provision of rainwater harvesting can be achieved as part of Actions 4.3 and 4.4 relating to SuD's.

Wicklow County Council works with An Taisce's Green Schools Travel Programme providing maps for schools to carry out walking and cycling audits for routes to schools by students themselves. This approach works well and has resulted in works being undertaken following audits to improve accessibility.

The provision of charging points for parking spaces should be considered through the County Development Plan guided by national planning guidelines and the Climate Action Plan. While targets are being set for the number of charging points to meet growing demand there is also a case to be made for all parking spaces to be cabled to facilitate future installation while also ensuring adequate charging points are installed to meet short term demand.

Requiring a carbon footprint of construction stage and life cycle of local authority projects would be difficult to achieve for all projects. Building standards and measures in the County Development Plan would be a more efficient process for achieving low carbon development.

Providing for upstream soft engineering as part of the development contribution scheme should be considered under Action 3.3 Promote the integrated planning, design and delivery of green infrastructure (including urban greening) through appropriate provisions in planning policies, development standards, infrastructural, public realm and community projects. Roads and Transportation have been added as a partner to this action.

The issue of tree preservation orders should be addressed through Action 5.4 on developing a tree policy.

The tree management strategy and reporting on tree removal and planting by each municipal district should be addressed in the Tree policy in Action 5.4.

A scheme for clearing and repair for gullies and drains with budgeting would build on existing works undertaken by the municipal districts. It should be added as a separate action in theme 4 in order to highlight its importance to climate adaptation. *Action 4.9 Develop a scheme to ensure clearing and repair of gullies and drains in all municipal districts.*

Action 5.1 should be amended to incorporate a process of mapping suitable sites for tree planting and should now read *Action 5.1 Undertake and implement an active tree planting programme, with mapping of sites suitable for planting, in the context of climate adaptation in conjunction with an awareness campaign that informs of the benefits to communities in improving air quality, offsetting carbon emissions, promoting biodiversity, limiting flood risk, reducing urban heat, as well as aesthetic value.*

A pollinator plan should be addressed under the Biodiversity Action Plan in Action 5.5. The National Pollinator Plan includes a good model for use in local authorities.

The NPWS would be the appropriate body to have an assessment done on the status/threat to blanket bogs and wetland habitats. Wicklow County Council should consult with the NPWS.

Climate Change information is widely available with opportunities to attend talks by experts available through the EPA's Climate Change Lecture series. Wicklow County Council staff and elected representatives can avail of these free talks by leading international experts, attending events in Dublin or by watching the live streaming. An action has already been added in response to previous submission to provide training. Action 1.21 *Develop and deliver training and awareness campaigns for staff, elected representatives and communities on Climate Action.*

Wicklow County Council operates under restrictions with relation to rate rebates. A specific grant scheme or assistance to seek funding through an existing grant scheme such as Better Energy Communities or Sustainable Energy Communities would be a better approach.

A 20% increase in tree planting is a worthy goal but a first priority should be to understand what trees are planted and where and what opportunities there are to increase planting. These issues should be addressed through the tree policy in Action 5.4.

Wicklow County Council following consultation with neighbouring local authorities with intent to share best practice has decided to expand its coastal protection actions, adding the additional actions which will address harbour protection. Action 2.11 Undertake a review of the current status of coastal erosion and protection measures, identifying areas that are vulnerable to increasing sea levels through CEFRAM maps in order to assess the effect of increasing tidal levels and inundation events. Action 2.12 Implement a monitoring and inspection programme for vulnerable areas of coasts, coastal protection works, harbours piers, marinas and quays, working with relevant external agencies to identify works that will protect them against rising sea levels. Action 2.13 Review Sea level exposed roads and Wicklow County Council managed harbours, piers and Quays to identify works required to protect these infrastructure assets. The Council Harbour Team will also have to assess the threats to the harbour infrastructure under Action 2.1.

Locations for farmer markets in each town are an issue but should be looked at in the context of broader issues with many failing to build product range and footfall. The food strategy recently published by Wicklow County Council aims to assist the development of farmers markets and the linked need to support and assist development of local produce. Food is an important cross cutting Climate action issue. The food strategy should be assessed to identify how it can assist in delivering Climate Action identifying which goals can help us deliver Climate Action. A new Action should be added Action 6.13 *Review Wicklow Food Strategy to review which goals and actions, including those developing local products and local markets can help to deliver on Climate Action.*

Staffing needs for biodiversity actions should be addressed through the Biodiversity Plan including a landscape architect, a Biodiversity Officer and an arborist.

The solar car port and solar panels for the roof in County Building is a mitigation measure. The solar car port is currently in planning and the roof was found to be currently unsuitable for photovoltaics.

Wicklow County Council agrees that working with vulnerable communities and harnessing the support of local volunteers can play a key role in flood preparedness. Actions 6.1 and 6.2 both aim to identify and develop a stronger working relationship with communities vulnerable to flooding.

The SPC on Climate Change and Biodiversity could bring forward the proposal to become a signatory to the EU Covenant of Mayors for Climate and Energy to the elected members of Wicklow County Council. It should be noted that Wicklow County Council is already undertaking the actions required but that it will entail additional bi-annual reporting on progress.

The working relationship between the steering group and the SPC should be facilitated by the liaison between the Chair of the SPC and the Chair of the steering group.

**Recommendation:**

**Amend the executive summary to clarify its role as an adaptation strategy.**

***Add Action 1.20 Assess the range of and scope of existing mitigation measures already undertaken by Wicklow County Council and those that will be required under the Climate Action Plan going forward.***

***Add Action 1.22 Develop a Green Procurement strategy for the organisation which will stipulate where specific conditions are to be assessed prior to procurement.***

***Add additional content to Action 1.15 Undertake a staff commuter survey with results used to assess the feasibility of remote working days, or promotion of car pooling or cycling and walking to work.***

***Add Action 2.9 Develop a Sustainable Transport Plan which will address public transport, cycling and pedestrian infrastructure, and measures to reduce car dependence and measures to reduce carbon emissions from car transport.***

***Add Action 4.9 Develop a scheme to ensure clearing and repair of gullies and drains in all municipal districts.***

***Action 5.1 should be amended to incorporate mapping of sites for tree planting to now read Action 5.1 Undertake and implement an active tree planting programme, with mapping of sites suitable for planting, in the context of climate adaptation in conjunction with an awareness campaign that informs of the benefits to communities in improving air quality, offsetting carbon emissions, promoting biodiversity, limiting flood risk, reducing urban heat, as well as aesthetic value.***

***To compliment the work of the Food Strategy add Action 6.13 Review Wicklow Food Strategy to review which goals and actions, including those developing local products and local markets can help to deliver on Climate Action.***

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**Sub No.6:      Jean Melia**



**Summary of issues raised:**

- Requests halting of installation of 5GRF-EMF
- Request that CommReg be called on to deny licensing for roll out
- Requests that the EPA and Minister for Communications, Climate Action and Environment establish a working group to investigate 5G

**Response to issues raised in submission:**

This is not a Climate Adaptation issue and should be addressed through other channels including the DCCA and Planning where there are local concerns about masts and repeaters proposals.

**Recommendation:**

**Not relevant to this strategy.**

**Sub No.7, 8,9,10,11,12,13,14,15,16,17,18,19,20,21,22,23,24,25,25,26,27, Emma Flood, Claire O Connor, Leigh Kenny, Tina Maxwell, Muriel Joyce, Carol Duffy, Christine Downey, Kelly Conlon, Margaret Dickenson, Fiona Tuite, Catriona Ridgeway, Kemp Kempies, Linda Murphy, Lynn Kavanagh, Evie Madden, Carol O Connor, Yvonne, O Reilly, Samantha Duffy, Ciara Kavanagh, Eimear Tuite, Seamus Gallagher.**

**Summary of issues raised:**

- Request a ban on hedge cutting during nesting season except for minimum safety requirements.

**Response to issues raised in submission:**

This submission does not specifically deal with a climate adaptation issue although it is relevant to the associated issue of biodiversity decline. Hedge cutting as an issue should be addressed in the review of the Biodiversity Plan, Action 5.5, where the issue of implementing existing legislation on hedge cutting could be strengthened by putting in place measures to better monitor and control cutting done in season. This would ensure it is only done on behalf of WCC when required for safety of road and footpath user and that reasons for cutting, when it does occur for safety, are documented.

**Recommendation:**



**Address the issue of hedge cutting through the review of the Biodiversity Plan.**



**Sub No 28: Cassie Steele**

**Summary of issues raised:**

- Questioning whether food waste is covered in the strategy and offered to write a piece.
- Concerned about over consumption, climate justice and waste in the commercial sector.
- Concerned about plastics and cutting waste to zero.

**Response to issues raised in submission:**

Wicklow County Council works with the Stop Food Waste campaign and EPA to promote better management of food waste among householders and the commercial sectors. Food waste and plastics will be priority themes under Action 6.10 which addresses waste prevention, resource efficiency and the circular economy. Food is an important cross cutting Climate Action issue. The new food strategy developed by Wicklow County Council should be assessed to identify how it can assist in delivering Climate Action identifying which goals can help us deliver Climate Action. A new Action will be added in response to previous representations. Action 6.13 *Review Wicklow Food Strategy to review which goals and actions, including those developing local products and local markets can help to deliver on Climate Action.*

**Recommendation:** The issue of food waste and plastics are covered by Action 6.10 An awareness campaign on the role of waste prevention, resource efficiency and the circular economy in climate action to demonstrate how it can assist in creating a more efficient and resilient local authority and strengthen the resilience of Wicklow communities. It will also be addressed through the proposed additional action, Action 6.13 *Review Wicklow Food Strategy to review which goals and actions, including those developing local products and local markets can help to deliver on Climate Action.*



**Sub No. 29: Helen Larkin**

**Summary of issues raised:**

- Declaration of a Climate and Biodiversity emergency not mentioned in the draft for public consultation.
- Requests that the plan covers the totality of mitigation and adaptation with a commitment to Net Zero GHG emissions by 2030.
- Requests that Wicklow be a leader rather than a laggard and acts as a role model in mitigation e.g. Green Buildings, Electric Vehicles, and Environmental Whistleblower Hotline.
- Uses its network of connections to engage all partners and stakeholders
- Measure and report on outcomes.
- Measure Countywide through a Wicklow Well-being Index.
- Reduce traffic by putting in buses and trams into the main areas of Dublin.
- Identify areas for tree planting.
- Convene a Local Wicklow Citizens Assembly and engage all partners particularly in the education sector including the third level sector in Carlow IT Wicklow County Council and KWETB.

#### **Response to issues raised in submission:**

The draft Climate Adaptation Strategy put out for consultation was exactly as presented to the Council on the 29<sup>th</sup> of April. The Climate and Biodiversity Emergency was declared after the members voted to put the strategy out to consultation. We can now make amendments suggested through public consultation so will reference the emergency declared in the introduction.

Incorporating existing mitigation measures into the existing strategy without substantial review would be challenging in the time frame for delivery and would also need to look at evolving policy. The strategy will be amended to take account of the Climate Action Plan which will broaden and strengthen the remit of Wicklow County Council in taking action on climate in addition to the focus here on adaptation. An action to scope existing mitigation measures and those that may arise from the Climate Action Plan will be useful to allow the SPC to address this end of Climate Action giving a baseline for development.

*Action 1.20 Assess the range of and scope of existing mitigation measures already undertaken by Wicklow County Council and those that will be required under the Climate Action Plan.* The target for the public sector for 2030 is to reduce energy consumption by 50%. This is a very ambitious and difficult to achieve target but Wicklow County Council intends to achieve it or surpass it if possible. Net zero by 2030 would not be achievable in the timeframe without a clear pathway to do so and setting a target that is unlikely to be achieved with current available solutions would not be recommended. The Climate Action Plan calls on all of the public sector to lead by example to inspire other to follow.

Wicklow County Council aims to show leadership through the implementation of this plan and in implementing relevant actions in the National Climate Action Plan. It aims to act as a role model stimulating action by others. We will continue to work with community groups and local organisations supporting the development of Climate Action initiatives at local level.

Wicklow County Council will continue to engage in wider networks and with partner organisations to ensure we learn and share good practice and work to find solutions for all. As part of this process

Wicklow County Council will work with other local authorities and partner organisation on the implementation of shared goals and objectives in our respective climate adaptation strategies.

Action 1.5 does require the development of service indicators for adaptation measures. As mentioned previously we will work with CARO, the regional office to develop key indicators looking to incorporate some that will be common to all local authorities, to allow cross comparison, and also where needed, some which may be specific to Wicklow. Action 1.4 requires the incorporation of Climate Adaptation into the service delivery programme which will allow for setting and monitoring of targets across the organisation at team and individual staff levels.

Buses and trams are more a mitigation measure rather than adaptation but transport can be considered a cross cutting theme with adaption considered in Action 2.3 Integrate climate considerations into the design, planning and construction of all roads, footpaths, bridges, public realm and other construction projects. Make provision to incorporate green infrastructure as a mechanism for carbon offset. Action 6.8 Explore feasibility of augmenting public transport and cycle routes within the County, including park and rides is relevant to this submission facilitating access to public transport. Action 6.9 Engagement with citizens on sustainable travel initiatives and schemes aims to build on work undertaken in 2019 with a major commuter survey. Work is already happening to tease out issues raised in the survey and solutions. Better public transport options are likely to play a role as are remote days working closer to home or at home and creating more jobs locally that match the skill set of those commuting.

Tree planting sites has already been raised as an issue. Action 5.1 should be amended to incorporate a process of mapping suitable sites for tree planting and should now read *Action 5.1 Undertake and implement an active tree planting programme, with mapping of sites suitable for planting, in the context of climate adaptation in conjunction with an awareness campaign that informs of the benefits to communities in improving air quality, offsetting carbon emissions, promoting biodiversity, limiting flood risk, reducing urban heat, as well as aesthetic value.*

The Citizen Assembly at national level played an important role in getting citizens views documented with a view to shaping policy at national level, helping to bridge the gap between citizens and policy makers. In Wicklow we already have structures in place to encourage a better role for citizens in making an input to policy. The elected representatives serve as a conduit from their local communities. The Public Participation Network allows citizens and groups to convene meetings that facilitate engagement by all members of the public. The interaction between people in the PPN, elected representatives and staff of Wicklow County Council already has the capacity to deliver the public engagement needed going forward. Wicklow County Council has built a strong working relationship with the schools of County Wicklow and will continue to work with schools to address Climate Action with the younger generation. It is already proposed in response to a previous submission that an action on Green Schools be added to the strategy to reflect this work. Wicklow County Council is not the lead on development of new training and education courses supplied by both Carlow Institute of Technology and the KWETB but will work in partnership with both organisations to facilitate new training opportunities.

**Recommendation:**

**Issues raised are addressed through existing actions, actions that will added relating to other submissions and through mitigation actions being worked on by Wicklow County Council that have not been covered in strategy.**

**Sub No. 30: Geraldine Flanagan**

**Summary of issues raised:**

- To put in place an effective tree management strategy which should incorporate advertising on removal of trees or hedgerows
- Requests tree protection orders for trees surveyed in Bray by a botanist.
- Planning permissions for housing should include the independent assessment of trees on site by an arborist funded by the council, who should make regular visits during building works. References the County Development Plan.
- Urban Tree planting. Use of a variety of trees.
- Create wildflower meadows and fruit planting in residential estates with large green spaces.

**Response to issues raised in submission:**

The issues raised in this submission play a minor role in Climate Adaptation, raising more significant issues about the design and maintenance of urban tree cover. It should be noted however that as well as aesthetics they can assist in moderating local climate and in some circumstances can assist in attenuating rainfall. They also have an important biodiversity function. The issues should largely be addressed through Action 5.1 Undertake and implement an active tree planting programme, with mapping of sites suitable for planting, in the context of climate adaptation in conjunction with an awareness campaign that informs of the benefits to communities in improving air quality, offsetting carbon emissions, promoting biodiversity, limiting flood risk, reducing urban heat, as well as aesthetic value. The issue of tree preservation orders should be addressed through Action 3.4 on developing a tree policy. The tree management and reporting on tree removal should be addressed in the Tree policy in Action 3.4. It is noted that the County Development Plan is referenced and this should be updated at review to take account of the Tree Policy.

The management of green space for biodiversity is a measure that should be addressed through the Biodiversity plan rather than in this strategy.

**Recommendation:**

**The issues raised here should be addressed in actions on developing a tree plant campaign and a tree maintenance policy both of which will contribute relative information to the County Development Plan when reviewed. The final issue on wildflowers for green spaces and fruit is more relevant to the Biodiversity Action Plan**

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**Sub No. 31: Sally Phelan**

**Summary of issues raised:**

- Review policies on cutting verges and green spaces to prioritise biodiversity
- If people need to be employed involve them more in planting native species.
- Develop educational programmes on biodiversity for schools and public plus training for staff.

**Response to issues raised in submission:**

This submission is not directly related to Climate Adaptation but does relate to the associated issue of biodiversity loss. They can best be addressed through a review of the Biodiversity Action Plan. While practice is changing in vegetation management in County Wicklow it would be good to have more precise policies and procedures on the matter. Wicklow County Council is actively involved in promoting biodiversity awareness through Green School, Tidy Towns and events to mark National Biodiversity Week and National Heritage Week. Training for staff following principals in the National pollinator Plan should be considered as an action in the Biodiversity Action Plan

**Recommendation:**

**As not directly relating to Climate Adaptation this submission can best be addressed though the review of the Biodiversity Action Plan.**

**Sub No. 32, 33: Jennifer Mc Hugo, Keith Scanlon**

**Summary of issues raised:**

- The same issues raised by Helen Larkin in Submission 29 recur in these submissions.
- They also request consideration of the actions attached to their submissions which come from the Wicklow Community for Climate and Biodiversity Action WC4CBA of which the mains suggestions are listed below.
- Define Wicklow Community Wellbeing as a key measure
- Ban smokey coal ensuring no social injustice.

- Ban on Fossil fuel public transport requiring electric, hybrid or hydrogen powered busses.
- Ban on all peat products
- Ban on all fracked fossil fuel products
- Ban on all peat and coal fired power generations
- Ban on all official buildings from using any electricity that is not generated from renewable sources.
- Ban single use plastics and balloon and lantern releases.
- Ban election posters except for a maximum two designated sites in each town.
- All official vehicles to drive at a speed of 80KPH with a possible exception on motorways.
- Go Carbon neutral by 2030 taking account of both production and consumption emissions. Call on government to make this possible.
- Phase out and ban all non Fair Trade Food.
- Promote and encourage local Wicklow food and drink.
- Ban all single use plastic water items, disposable coffee cups and plastic water bottles.
- Promote the conscious cup and refill.ie campaigns across Wicklow
- Phase out and ban all non fair trade mobile phones and other electronics where fair trade alternatives exist.
- An immediate stop and review of all unlicensed tree felling. Only under strict licence from NPWS with no exemptions for official bodies such as Irish Rail, NTA, TFI Bus connect.
- Protection of all Wicklow waters as nature reserves/ marine protected areas banning all pollution and over exploitation.
- Ban all non native forestry planting and expand native forestry planting.
- Ban the use Glyphosate except emergency licence use e.g. for invasive species.
- Ban any Planning Permission for development without Environmental Impact Assessment (public and Private)
- Create a Wicklow Wellbeing/sustainable progress/emergency transformation index
- Request display of Wicklow Wellbeing and emergency transformation index on the front pages of local papers
- Ensure Climate and biodiversity reports available in all public libraries including IPCC IPBES and JCCC.
- Monitoring of Wicklow County Council and municipal districts to reduce carbon budgets including individual contributions such as private cars , equipment on standby and holidays.
- Request every school and every club or society to draft a Biodiversity Action Plan requesting ideas from school on rewilding.
- Promote the An Taisce Climate Ambassador Programme to every school.
- Support development of a full range of Wicklow Climate and Biodiversity Awareness Leadership courses with Carlow IT Co. Wicklow campus and KWETB.
- Hold an annual Wicklow Climate and Biodiversity festival using best sustainable practices.
- Appoint a Wicklow Citizens Assembly on Climate & Biodiversity emergency measures.
- Appoint a Wicklow Commissioner for Climate and Biodiversity transformation.

- Lead a Fridays4Future mass volunteering programme every Friday to undertake biodiversity themed activities.
- Pilot a deposit refund scheme on bottles and cans by 2020.
- Littering education and enforcement programme investment.
- All officials and citizens to report all litter on openlittermap.com in order to create open data. With easy downloads into apps like See it Say it.
- Housing issues including provision of hostel places and investigation of deaths of rough sleepers.
- Passive design requirement for new housing and training of people in passive building.
- Each municipal district to support “Common Ground “ style ecology, food, craft skills local exchange sharing communities. Relaunch of Tidy Towns if needed.
- Wicklow County Council to push for local healthy low carbon footprint food.
- Promote meat free Wednesday and Friday.
- Research and pilot with Carlow IT Wicklow County Campus publishing carbon footprints for local foods.
- Wicklow to take part in the EU Life Project “Biodiversity in standards and labels for the food industry.
- All harbours to provide landing facilities for local artisan fishermen.
- Install water refill locations in all schools in Wicklow internal and external.
- Rewet Irish bogs.
- Repeal the Heritage Bill 2018.
- No hedge trimming during nesting season.
- 2 flagship nature reserves to be actively developed to attract and record two additional breeding species each year.
- Assistance to farmers to diversify from cattle and sheep to tillage.
- Green every public building with solar cells, trees, native plant green roofs, green car parks rainwater collection, ponds bird and bat boxes.
- Retrofit every public building with sustainable energy solutions.
- Electric vehicle charging points to be installed in every public park and ride car park and every town with over 5,000 residents.
- 15% of all new housing developments to fund the river and forest nature reserves/ wildlife corridors.
- Support the set up of sustainable energy communities SECs. Support the evolution of a energy agency.

**Response to issues raised in submission:**

See response to submission 29 for response to issues raised in the main body of text as they are the same issues.

Wicklow County Council will be guided through national policy on methodologies for measuring well being to ensure data is comparable with other local authorities.

Existing bans on coal burning were implemented through national legislation following recommendation by Wicklow County Council and other bodies. The newly published Climate Action Plan sets out a road map for phasing out burning of coal and peat products. Wicklow County fully endorses the Climate Action Plan and will do everything it can within its remit to achieve the targets. Peat products and coal and peat powered electricity generation are also covered in the plan. These are mitigation measures.

Wicklow County Council will be guided by National legislation on fracking for gas production.

A ban on use of non renewable generated electricity in public buildings would be a mitigation measure. Wicklow County Council will work to achieve the target of a 50% reduction in energy consumption for all our buildings using renewable energy as a alternative where feasible. Wicklow County Council through the County Development Plan is committed to the development of renewable energy in the county, being mindful of its impact at local level.

The operation of bus fleet is outside of the remit of Wicklow County Council. It should be noted that the Climate Action Plan set a target for conversion to electric vehicles in all urban networks. No further diesel buses are to be purchased from July 2019 for this fleet.

Wicklow County Council has already committed to phasing out the use of single use plastics in its own activities. It is beyond the remit of Wicklow County Council to ban these materials in public. We do share concerns that such items contribute both to the unnecessary generation of waste and litter and will endeavour to focus awareness campaigns on their elimination or replacement as appropriate. Action 6.10 on awareness of the role of waste prevention, resource efficiency and the circular economy addresses this issue.

Election posters are exempt from planning restrictions under national legislation. They do play a role in introducing candidates' particular new candidates. Wicklow County Council supports the work many towns are undertaking to limit their use in town centres and promote better practice among candidates but must remain independent of the election process.

A sustainable transport policy is being developed in response to a previous submission. Action 2.9 Develop a Sustainable Transport Plan which will address public transport, cycling and pedestrian infrastructure, measures to reduce car dependence and measures to reduce carbon emissions from car transport. As part of training for drivers of council vehicle reducing speed is already covered.

Phasing out carbon emissions is a mitigation rather than adaptation measure. EU and Irish Policy is rapidly moving towards a net carbon neutral by 2050 policy which by itself will be a challenging goal. It is important that goals set are ambitious but also realistically achievable within the timeframe set. Wicklow County Council will aim to achieve all national target and going forward will aim to be a leader in achieving those targets but without national and EU regulation, policy and drivers it would be unrealistic to set goals significantly higher. Wicklow County Council would not be in a position to influence consumption emission (scope 3 of the Greenhouse Gas Protocol).

Fair trade is not a Climate adaptation issue but Wicklow County Council has always supported Fair-trade initiatives in the county must recently providing funding to Baltinglass Fair-trade. Wicklow County Council agrees that local food will play a key role. Food is an important cross cutting Climate action



issue. The new food strategy developed by Wicklow County Council should be assessed to identify how it can assist in delivering Climate Action identifying which goals can help us deliver Climate Action. A new Action could be added Action 6.13 *Review Wicklow Food Strategy to review which goals and actions, including those developing local products and local markets can help to deliver on Climate Action.*

It is outside the remit of Wicklow County Council to impose a licensing system for tree felling to be supervised by the NPWS covering all transport bodies in the country. Wicklow County Council agrees that protecting and enhancing tree cover will be an important cross cutting climate action measure. The issue of maintaining trees will be addressed through Action 5.4 on developing a tree policy.

Wicklow County Council plays a key role in the protection of Wicklow water through our work on implementing the River Basin Management plan in County Wicklow. Wicklow County Council will through the plan, working with LAWPRO, to monitor water quality and take target actions to improve water quality throughout the county with the objective of reaching good water quality status for all waters.

A ban on all non native forestry is not a climate adaptation issue. Wicklow County Council can going forward promote the planting of native species in its own planting programmes and those for which it provides funding too at community level. This can best be achieved through Action 5.1 to undertake a tree planting programme, Action 5.4 a tree policy and Action 6.5 which will ensure grants are climate resilient.

A ban on glyphosate is not a climate adaptation issue. Concerns have been expressed about its impact on human health and on biodiversity. It could be considered under the review of the Biodiversity Action Plan, Action 5.5. it is also something that the SPC on Climate and Biodiversity could consider bringing to the council separately. As mentioned in the submission it would be worthwhile considering whether any exemptions are required as for invasive species. It would be worthwhile to quantify and qualify current usage by Wicklow County Council in order to assess how and why it is being used.

National guidelines specify what type and scale of developments need to undertake EIA. It would not be appropriate to mandate and EIA for all planning permissions public and private.

Wicklow County Council will be guided through national policy on methodologies for measuring well being to ensure data is comparable with other local authorities. CARO will play a role in developing measurement for progress on implementation of this strategy

Wicklow County Council does not have editorial control of local papers. Press releases on progress can be issued.

Policing and monitoring individuals' energy consumption should be a matter for the individual. Awareness campaigns, national regulations and policy drivers will play a role in shaping behaviour. The proposed roll out of smart meters will help people make decisions.

Wicklow County Council works closely with schools through Green Schools to promote better practice and encourage schools to improve their environmental performance. An Taisce are developing a new Climate Action programme within Green Schools. Wicklow County Council will support the roll out of

this programme. The Environmental Awareness Office undertakes activities, workshops, seminars and competitions tailored to help schools and youth groups explore the environment as part of the curriculum and will continue to develop unique projects to assist schools address awareness on Climate Change. An action will be added to Theme 6 on education in schools.

Wicklow County Council is not the lead on development of new training and education courses supplied by both Carlow Institute of Technology and the KWETB but will work in partnership with both organisations to facilitate new training opportunities.

Wicklow County Council provides funding towards many festival events throughout the county. Wicklow County Council encourages towns and communities to develop festivals from a bottom up approach in order to promote local ownership of events. Wicklow County Council would be supportive of a Climate biodiversity festival organised by one of our towns or communities.

The Citizen Assembly at national level played an important role in getting citizens views documented with a view to shaping policy at national level, helping to bridge the gap between citizens and policy makers. In Wicklow we already have structures in place to facilitate a better role for citizens in making an input to policy. The elected representatives serve as a conduit from their local communities. The Public Participation Network allows citizens and groups to convene meetings that facilitate engagement by all members of the public. The interaction between people in the PPN, elected representatives and staff of Wicklow County Council already has the capacity to deliver the public engagement needed going forward.

Wicklow does not require a Climate and Biodiversity Commissioner. There is already representation through the elected members and the newly established SPC on Climate and Biodiversity.

A mass volunteering programme or voluntary conscription for Fridays is an initiative that might be best led by Wicklow Volunteer Services rather than Wicklow County Council who have more experience in recruiting volunteers. There are a huge wealth of programmes and groups undertaking relevant actions and projects at community level which relate to Climate Action and Biodiversity. The numbers involved are large and the work achieved in our communities is impressive. This issue does touch on something very important which warrants an additional action being added to the strategy on the role of volunteers in climate action. New Actions will be added Action 6.14 Support local groups in undertaking suitable climate action projects through advice, information, grants and service support and 6.15 Expand the reach of WCC's annual Tidy Towns and Environmental Awards to engage a greater range of groups, give greater recognition to work done by schools and recognise a greater range of environmental activities that help to address climate change.

A deposit return scheme for bottle and cans should be addressed at nation level rather than local level to ensure full participation by all players including the producers, retailers, REPAK as well local authorities.

Wicklow County Council operates a litter education and awareness programme and a waste enforcement programme.

The See it say it app is already in use covering Wicklow. Wicklow is guided by the Waste Enforcement Regional Lead Authority on the adoption of technology.

Emergency hostel space provision and investigation of rough sleepers death are not suitable areas for action in this strategy.

Wicklow County Council build to standards set at national level which is at nearly zero energy building standard. Of more relevance to climate action is the proposal in the Climate Action Plan to undertake a deep retrofit of all local authority housing stock.

Food has already been addressed in this submission. Wicklow County Council will continue to support groups like Common Ground and the Tidy Town groups. Action 6.1 on the PPN will be relevant to assisting such groups.

Wicklow County Council will support campaigns on good practice in healthy eating and low carbon food but will not specifically focus on absolute outcomes. Wicklow County Council works with Wicklow Partnership and the HSE to deliver a healthy foods programme which aims to tackle food waste and food poverty as well as healthy choices in food.

Wicklow County Council is not the appropriate body to research carbon footprints of local Wicklow branded foods. The food strategy may present opportunities going forward for academic research on the carbon footprint for some local produce. This research should be guided by the appropriate research bodies at national level.

The EU LiFE project “Biodiversity in Standards and Labels for the Food Industry” falls outside of the scope of Wicklow County Councils activities. Teagasc or Origin Green might be a more appropriate partner for this research.

Landing facilities for fishermen is not a Climate Adaptation matter.

Wicklow County Council is currently working on an EPA funded project to support the refill.ie campaign which includes installing water bottle filling fountains in secondary schools. It is covered under Action 6.10 An awareness campaign on the role of waste prevention, resource efficiency and the circular economy.

Designation of the Irish Sea is outside the scope of this strategy.

Protecting rivers has already been answered.

The rewetting of bogs is not relevant to Wicklow.

The repeal of the Heritage bill is a national issue to be dealt with by Dail Eireann.

Hedge trimming and use of pesticides should be addressed through the review of the Biodiversity Plan as it is not an adaptation measure.

Requests for designation of nature reserves would best be done through the NPWS who have the relevant technical experience.

Assisting farmers to divert from cattle and sheep to tillage would best be considered by Teagasc who have the appropriate technical expertise.

Wicklow County Council is currently working on mitigating its energy consumption throughout its public building stock as is the broader public sector. The target is a 33% reduction in energy consumption by 2020 and 50% by 2030.

Wicklow County Council will continue to work with SEAI and ESB networks to enable provision of EV charging points throughout the whole county. This action is more a mitigation measure and is adequately covered in the Climate Action Plan.

Funding for nature reserves through development levies would need to be considered under the County Development Plan.

Wicklow County Council is working with the first of the Sustainable Energy Communities that have been set up in Wicklow and will work to stimulate more interest going forward. Wicklow County Council has signed a contract for services with the Three Counties Energy agency to support our work on energy mitigation.

**Recommendation:**

***New actions will be added Action 6.14 Support local groups in undertaking suitable climate action projects through advice, information, grants and service support and Action 6.15 Expand the reach of WCC's annual Tidy Towns and Environmental Awards to engage a greater range of groups, give greater recognition to work done by schools and recognise a greater range of environmental activities that help to address climate change.***



**Sub No. 34: Charlie Keddy**

**Summary of issues raised:**

- Objecting to Strategic planning guidelines for Greater Dublin Area 1999 which he feels are taking precedence over local area plans and impacting on local biodiversity.

**Response to issues raised in submission:**

**The Climate Adaptation Strategy is not a vehicle for raising concerns about regional planning issues. These concerns would be better addressed during the review of the County Development Plan.**

**Recommendation:**

**No Action required.**

**Sub No.35: Comhairle na nóg**

**Summary of issues raised:**

- Concerned that not enough attention is paid to youth in the strategy.
- Request that Comhairle na nóg be included as partners within Theme 1 and Theme 6

**Response to issues raised in submission:**

Wicklow County Council recognises that youth will be most affected by Climate Change and that young people played a key role in vocalizing concern about the issue in 2019. Wicklow County Council believes it is important to listen to what youth are saying on the issues and to facilitate their full participation in Climate Action. Wicklow County Council will offer a place on the Climate and Biodiversity SPC to a youth representative to ensure they have a voice.

As previously covered An Taisce are developing a new Climate Action programme within Green Schools building on their Climate Ambassador programme. Wicklow County Council will support the roll out of this programme. The Environmental Awareness Office undertakes activities, workshops, seminars and competitions tailored to help schools explore the environment as part of the curriculum and will continue to develop unique projects to assist schools address awareness on Climate Change. An action will be added to Theme 6 on education in schools. Wicklow County Council will also be mindful of the role that Climate Action will play in shaping other youth orientated programmes throughout the organisation particularly in Community and Economic Development and through the PPN where youth groups would be one of the key partners which is auctioned in 6.1 Through the Public Participation Network (PPN) raise awareness of the impacts of climate change and ways for communities to increase response and resilience to these impacts.

**Recommendation:**

**A youth representative should be sought for the Climate and Biodiversity SPC.**

**Sub No.36, 37,38,39, 40, 41,42,43,44,45,46,47,48,49,50,51,52,53 : Donagh Mc Gowan, Cllr. Mary Kavanagh, Lisa Dickenson, Pat Tyrrell, Kelly Ann Conroy, Liz Grehan, Gerry O Reilly, Donna Connolly, Siobhan Forde, Deirdre Burke, Stanley Kenny, Nora Gaffney O Connor, Margaret Stokes, Maeve Bracken, Jackie O Toole, Annmarie Roche, Tracy Doran**

**Summary of issues raised:**

- A ban on tree felling except where strictly need and only under licence from the DCCAE.
- Allowing grass verges and wildflowers to grow to feed our pollinators.
- A ban on hedge cutting during the nesting season with only a bare minimum permitted at signage and road junctions.
- A ban on the use of pesticides containing glysohate or similar products.
- A ban on the use of single use plastics in all Council buildings.

**Response to issues raised in submission:**

It is outside the remit of Wicklow County Council to impose a licensing system for tree felling to be set up by the DCCAE. Wicklow County Council agrees that protecting and enhancing tree cover will be an important cross cutting climate action measure. The issue of maintaining trees will be addressed through Action 3.4 on developing a tree policy which will look at how better maintenance can help us to protect and keep trees addressing some of the issues that lead to their removal.

Wild verges on our roadways and wild flower planting should be addressed through Action 5.5 in the review of the Biodiversity Action Plan as it is not a climate Adaptation measure but does correspond as a cross cutting Climate and biodiversity issue. The National Pollinator plan includes a good model for use in local authorities and can help to guide actions in this area.

A ban on glysohate or similar products is not a climate adaptation issue. Concerns have been expressed about its impact on human health and on biodiversity. It could be considered under the review of the Biodiversity Action Plan, Action 5.5. it is something that the SPC on Climate and Biodiversity could consider bringing to the council. As mentioned in the submission it would be worthwhile considering whether any exemptions are required as for invasive species. It would be worthwhile to quantify and qualify current usage by Wicklow County Council in order to assess how and why it is being used.

Wicklow County Council has already committed to phasing out the use of single use plastics in its own activities. We do share concerns that such items contribute both to the unnecessary generation of waste and litter and will endeavour to focus awareness campaigns on their elimination or replacement as appropriate. Action 6.10 on awareness of the role of waste prevention, resource efficiency and the circular economy addresses this issue.

Wicklow County Council has given consideration to the key role biodiversity can play in maintaining an environment more resilient to Climate Change.

**Recommendation:**

**Issues raised here can be addressed through existing actions are through a review of the Biodiversity Action Plan.**



**Sub No.53: An Taisce**

**Summary of issues raised:**

- Strategy is over generalized and lacks details, timeframes are vague and inadequate, there are no key targets, no details of funding sources, no identification of people or organisations tasked with actions. Term “Budgeted” requires clarification.
- The fourth aim of the high level goals describes how potential changes may result in additional benefits and opportunities. This insinuates that there may be benefits to climate change and detracts from the severity of the current situation, is contradictory to a declaration of a climate emergency and the phrase has no place in the Strategy.
- Strategy is an instrument of the Climate Action and Low Carbon Development Act and is subject to judicial review.
- Strategy underestimates the importance of biodiversity for climate mitigation and adaptation.
- Strategy places primary responsibility for Action 3.1 and Action 3.2 with the planning department of the County Council. But without full stakeholder engagement (state and semi-state bodies, public, business and environmental groups) these will not be achieved, nor does the planning system have mechanisms that provide for climate change considerations to be integrated.
- With regard to Action 6.8 and Action 6.9 strategy does not give sufficient importance to active transport, i.e. cycling or walking, and does not give specific measures to achieve these actions.
- Despite the vague ambitions of Action 2.3, provision of green infrastructure, strategy seems to be at odds with Transport Policy for Ireland (2009 – 2020), reducing car commuting from 65% to 45%, by concentrating on providing infrastructure that will facilitate the ongoing prevalence of combustion motorised transport.
- No mention of natural flood retention in the Strategy and a change in policy to protect upland peaty habitats and a change in forest policy (away from the alien conifer clear fell model by Coillte et al.) would reduce run-off potential that causes flooding.
- Strategy should define the methodology for implementation as opposed to the proposal that the Climate Action Steering Group come up with this methodology. The Steering Groups fails to include public stakeholder representation or environmental NGOs.

**Recommendations:**

- Set up emergency climate action task force to implement actions of the final Plan
- The above group to examine integration of this Plan with other plans
- Plan should have more specific, immediate and timetabled targets
- Plan should include a financial plan outlining how it will be funded
- Biodiversity concerns should be a comprehensive part of the Plan
- Plan’s Transport Section should assess and promote sustainable transport policies

**Response to issues raised in submission:**

The strategy aims to create a process for considering adaptation in all activities of Wicklow County Council going forward. It aims to ensure that full consideration is given to Climate Adaptation in the planning and delivery of services. It does not seek to identify every action that may be needed going forward but rather to ensure that Climate Adaptation is considered at all levels of governance, operations and service delivery and becomes a primary consideration across the organisation. The High level themes and their respective high level goals have been chosen to ensure that the strategy influences all work programmes taking account of the framework in which services are delivered including governance, the infrastructure under our remit, the planning of land use and development, drainage and flood management, natural and cultural resources and community. Theme 1, Action 5 does require the development of service indicators for adaptation measures. We will work with CARO the regional office to develop key indicators looking to incorporate some that will be common to all local authorities to allow comparison and also where needed some which may be specific to Wicklow. Timelines currently look at short medium and long term. Once a SPC has been fully established, the budget decisions have been made and the Climate Action Officer recruited we can start to clarify more precisely dates for implementation of actions. "Budgeted" refers to measures that can be completed within existing resources requiring no extra funding. All actions have been assigned to an appropriate directorate, section or office who will then decide on how who and how actions will be implemented.

Benefits and opportunities were mentioned under high level goals precisely because this point is often over looked and is something to consider in moving County Wicklow forward. Wicklow County Council recognises that vulnerabilities and threats to our communities, environment and economy are far more likely and that is why almost all the actions are focused on preventing, minimizing or adapting to negative impacts. There are benefits and opportunities for County Wicklow which can help us to achieve a lower carbon economy and more resilient communities providing a better environment, better social conditions and economic opportunities for all. Examples would include job creation in renewable and retrofitting of buildings displacing high fossil fuel consumption, promotion of County Wicklow as an aviation free holiday destination reducing individual carbon footprints, promoting local produce and building chains of supply from local producer to local businesses and consumers as the new food strategy does, reducing food miles. Benefits and opportunities should be pursued where they lower carbon consumption and increase community resilience. Presenting an opportunity to build a better future is critical to engage all.. It is already proposed to add a new Action 6.xx *Review Wicklow Food Strategy to assess which goals and actions, including those developing local products and local markets can help to deliver on Climate Action.*

Wicklow County Council recognises that the strategy is a statutory document subject to judicial review and is endeavouring through working with CARO, a thorough and detailed evaluation of its services and a very comprehensive public consultation to deliver a strategy that will embed a culture of Climate Adaption across all its functions and operations.

Wicklow County Council agrees with An Taisce that Biodiversity is critically important to both mitigation and adaptation with regard to Climate Action. Action 3.5 is not the only action which addresses the role of biodiversity. Actions 3.3 Promote the integrated planning, design and delivery of green



infrastructure (including urban greening) through appropriate provisions in planning policies, development standards, infrastructural, public realm and community projects. And 3.6 Undertake the identification, recording and mapping of wetlands and other locally important biodiversity areas and use this information to inform land use decisions, both consider its key role in land use planning. 4.5 Investigate best practice in storm runoff attenuation through the use of green infrastructure in urban open spaces and 4.8 looks at its role in flood management.

Almost all of theme 5 on Natural resources and cultural infrastructure gives consideration to Biodiversity. Wicklow County Council declared a Climate and Biodiversity emergency and recognises that Biodiversity has a role in mitigation and adaptation as well as being directly affected by Climate Change and other pressure. Many submissions have been made on biodiversity most frequent of which have been issues with hedge cutting, use of pesticides and tree care. The Biodiversity Action plan and associated local plans are to be reviewed under action 3.3 which the appropriate document for addressing all concerns relating to biodiversity and how we can work to protect it and make it more resilient to change.

The Planning section is the lead on Actions 3.1 and Action 3.2 but as pointed out the work will involve significant levels of consultation with a range of stakeholders and sectoral interests. As well as the individual local authority plans there are twelve sectoral plans at an advanced stage of development or completion in some cases. They are as follows:

- Seafood - Department of Agriculture, Food and the Marine
- Agriculture - Department of Agriculture, Food and the Marine
- Forestry - Department of Agriculture, Food and the Marine
- Biodiversity - Department of Culture, Heritage and the Gaeltacht
- Built and Archaeological Heritage - Department of Culture, Heritage and the Gaeltacht
- Transport infrastructure - Department of Transport, Tourism and Sport
- Electricity and Gas Networks - Department of Communications, Climate Action and Environment
- Communications networks - Department of Communications, Climate Action and Environment
- Flood Risk Management - Office of Public Works
- Water Quality - Department of Housing, Planning and Local Government
- Water Services Infrastructure - Department of Housing, Planning and Local Government
- Health - Department of Health

Wicklow County Council will work in partnership as appropriate with state organizations to implement measures. CARO will facilitate the sharing of information across the sectors. Wicklow County Council agrees that a closer working relationship with key stakeholders is needed. The farming and rural community and other landowners will be key partners in delivering adaptation and mitigation measures, and that we will need to engage and work more closely with this sector in particular in order to strengthen our capacity to protect resources for all in County Wicklow. An action to facilitate this will be incorporated to the plan under Theme 6 Community Health and Well Being in response to a previous submission. Action 6. 11: Develop a steering group to explore and develop common goals and objectives between Wicklow

County Council and representatives from the farming, forestry and landowners sectors in rural and upland areas of the county.

The planning system is guided by national policy through the Planning Act 2001 as amended.

Wicklow County Council agrees that consideration of species and habitats is important to protecting biodiversity and that Climate Change will change vulnerability for some habitats or species. Wicklow County Council already considers all designated sites including the Natura 2000 sites NHAs, PHNA and other sites in the County Development Plan in as part of the planning process. There are a broad range of data sets exhibited or referenced in the County Development plan and also available through a wide range of sources including EU databases, the EPA's mapping of data sets for the country, the National Biodiversity Centres maps for species distribution. Geo hive from the Ordinance survey allows specific searches at local level for data sets. Using the information should be critical consideration. We are adding a new action in response to a previous submission , *Action 5.10 Undertake a study to identify natural corridors in County Wicklow and measures that can be taken to improve connectivity along these corridors and opportunities to increase connectivity between corridors* is already being added following an earlier submission. This would be a more useful approach for moving forward now in assisting the adaption of species to a changing climate using existing data sets.

The relevant plans will be the appropriate document for assessing what mechanisms will be used, whether they will be obligatory and what best practice designs will be used.

Action 6.8 and Action 6.9 recognise the importance of delivering more sustainable transport in the county. The aim is to shift focus to car free travel in the development of infrastructure at municipal level and also promote better engagement of the public in exploring car free travel options where feasible. Wicklow County Council will need to engage outside actors in the delivery of both infrastructure and services but our first priority is to embed a culture of exploring options within staff of the organisation so that they can engage in seeking opportunities going forward. The development of specific infrastructure will be dependent on local needs, opportunities and funding. Our first step is to focus attention within our towns on assessing those needs. We agree with An Taisce that more specific actions need to be identified and auctioned on with the timeframe of this strategy and propose amending Action 6.8 to give clearer guidance on what needs to be done. The new action should read Action 6.8 Assess feasibility of augmenting public transport, pedestrian and cycle routes within the County, including park and rides, identifying key priorities for each of the five municipal districts. Action to be taken on at least three identified priorities in each municipal district over the life time of this strategy with a time frame established for addressing other identified priorities.

Commuting has been identified as key concern for the future development of County Wicklow. A large scale commuter survey was undertaken in 2018 with the results showing high level s of frustration with the daily car commute to work. Wicklow County Council is already assessing measures that can reduce the need to commute. Promotion and development of co-working hubs to facilitate working from their locality is more of a mitigation measure. It is already actively promoted through the Local Economic and Community Development Strategy. The introduction of remote working days is a measure that should be considered as a follow up measure to a staff commuting survey in Action 1.15. This action can be augmented to include a range of potential outcomes including remote working days, public

transport, cycling or walking promotion. Council office space in other locations could offer opportunity for remote working. *Action 1.15 Undertake a staff commuter survey with result used to assess the feasibility of remote working days, or promotion of car pooling or cycling and walking to work.* Wicklow County Council has an opportunity to build further on the commuter survey using it and other data sets to create a more focussed approach in economic and community development on implementing measures to change commuting practices and create more opportunity to develop local alternatives to commuting. Wicklow County Council will add a new action *6.16 Facilitate cooperation between CCSD, LEO and Roads and Transportation services, to ensure they coordinate measures to reduce dependence by the public on commuting for work, identifying measures to provide car independent work opportunities.*

This issue was already touched on in a previous submission by the DAFM. Wicklow County Council recognises that Coillte, the NPWS, the farming community and landowners will be key partners in delivering adaptation and mitigation measures for County Wicklow, that Wicklow County Council does not decide for landowners on all land use activities, and that we will need to engage and work more closely with this sector in order to strengthen our capacity to protect resources for all in County Wicklow. An action to facilitate this should be incorporated to the strategy under Theme 6 Community Health and Well Being. Action 6. 11: Develop a steering group to explore and develop common goals and objectives between Wicklow County Council and representatives from the farming, forestry, Parks and Wildlife Service and landowners sectors in rural and upland areas of the county.

Wicklow County Council declared a Climate and Biodiversity shortly after this draft Strategy was published. One of the first measures taken by the new Council elected in June was to create a new Special Policy Committee on Climate and Biodiversity. This committee will have representation from a range of stakeholders. Consultations are taking place through the Public Participation Network to identify candidates for the committee. The committee will liaise directly with and be represented on the steering group. It will play a key role in the monitoring and implementation of the strategy. A new action should be added to document this new SPC and its role. Action 1.23 Create a Climate and Biodiversity Special Policy Committee, SPC, to examine Climate and Biodiversity policy, advise and monitor the work of Wicklow County Council on Climate Action and implementation of this strategy. The SPC should have representation from the members of Wicklow County Council and other stakeholders in the County.

Timelines have been projected based on available information and priority. Theme 1, Action 5 does require the development of service indicators for adaptation measures. Budgeting, resources, and timeframes for review of other policies and plans will play a key role in shaping delivery. It would not be appropriate to prejudge decision that have yet particularly at local but also at national level on funding that will be allocated. Keys factors will include the recruitment of a Climate Action Officer, the establishment of both the steering group and the SPC. It should then be feasible for the development of a precise timescale with indicators by early 2020 allowing for full consultation with relevant services, budgeting and allocation of resources. Wicklow County Council will put in text clarifying time frames in terms of what short, medium and long mean. It is understood that national indicators will be developed to measure all local authorities' progress and that of other sectors. CARO will play a role in defining common measurement indicators going forward.

The appointment of a biodiversity officer should be considered under a Biodiversity Plan and is a matter that the SPC on Climate and Biodiversity may choose to address.

**Recommendation: Update Action 6.8 to read Action 6.8 Assess feasibility of augmenting public transport, pedestrian and cycle routes within the County, including park and rides, identifying key priorities for each of the five municipal districts. Action to be taken on at least three identified priorities in each municipal district over the life time of this strategy with a time frame established for addressing other identified priorities.**

**Update Action 3.1 to include Transport and Roads and Community and Economic Development as relevant actors in the production of plans.**

***Add a new action 6.16 Facilitate cooperation between CCSD, LEO and Roads and Transportation services, to ensure they coordinate measures to reduce dependence by the public on commuting for work, identifying measures to provide car independent work opportunities.***

***Add Action 1.23 Create a Climate and Biodiversity Special Policy Committee, SPC, to examine Climate and Biodiversity policy, advise and monitor the work of Wicklow County Council on Climate Action and implementation of this strategy. The SPC should have representation from the members of Wicklow County Council and other stakeholders in the County.***

**Sub No. 54: Sinead Wallace**

**Summary of issues raised:**

- Mitigation should be the first issues addressed before adaptation. Requests that an action plan be developed including both adaptation and mitigation.
- Request a reference to the emergency declared by Wicklow County Council.
- Commit to net zero GHG emissions by 2030.
- Requests that biodiversity actions be addressed.
- Little focus on the marine environment and the Murrough.
- Adequate funding is required to enforce policies.
- Lack of enforcement and inadequate staffing on issues like hedge cutting and tree cutting.
- Concerned that the poor planning and development standards is hindering preservation of biodiversity. States that planning is the one area where Wicklow County Council has full control without need for other bodies to cooperate.
- States that Wicklow County Council could be a leader in demanding new standards.
- All current waterways should have a preservation order.
- Nature corridors should be designated to allow for free movement of species.
- All new estates/developments need to have 50% green area.
- Include all measurements, bans, boycotts and action proposed by the Wicklow Community for Climate and Biodiversity Action.

**Response to issues raised in submission:**

Incorporating existing mitigation measures into the existing strategy without substantial review would be challenging in the time frame for delivery and would also need to look at evolving policy. The strategy will be amended to take account of the Climate Action Plan which will broaden and strengthen the remit of Wicklow County Council in taking action on climate in addition to the focus here on adaptation. An action to scope existing mitigation measures and those that may arise from the Climate Action Plan will be useful to allow the SPC to address this end of Climate Action giving a baseline for development.

*Action 1.20 Assess the range of and scope of existing mitigation measures already undertaken by Wicklow County Council and those that will be required under the Climate Action Plan.*

The draft Climate Adaptation Strategy put out for consultation was exactly as presented to the Council on the 29<sup>th</sup> of April. The Climate and Biodiversity Emergency was declared after the members voted to put the strategy out to consultation. We can now make amendments suggested through public consultation so will reference the emergency declared in the introduction.

The target for the public sector for 2030 is to reduce energy consumption by 50%. This is a very ambitious and difficult to achieve target but Wicklow County Council intends to achieve it. Net zero by 2030 would not be achievable in the timeframe without a clear pathway to do so and setting a target that is unlikely to be achieved with current available solutions would not be recommended. The Climate Action Plan calls on all of the public sector to lead by example to inspire other to follow and we would hope to inspire all to join us in reaching a 50% reduction by 2030 and net zero emissions by 2050.

Many specific biodiversity actions have already been mentioned in submissions. Where a biodiversity action relates specifically to climate adaptation we are incorporating it into this strategy. Other biodiversity actions should be addressed through the Biodiversity Action Plan which will put them into the context of the overarching framework and legislation. Action 5.5 set out a review of the Biodiversity Action Plan, which will an opportunity to address more fully the issue of biodiversity loss

*Action 5.7 Ensure adequate scoping for climate impacts in the Strategic Review of the Maritime for County Wicklow* aims to address climate adaptation issues. Discussions during the presentation given to the PPN meeting referred to in the submission clarified that participants want to see more action taken to protect marine biodiversity and raise awareness on marine biodiversity. This is an issue that should be addressed in more detail during the review of the Biodiversity Action plan.

Adequate funding to enforce policies should be addressed through annual budgeting.

Wicklow County Council does not play the primary role in enforcement of the Wildlife Act and is not resourced to enforce the act.

Wicklow County Council recognises the important role the County Development Plan will play in delivering climate adaptation. Wicklow County Council will be proactive in seeking to lead with best practice going beyond guidelines where feasible options have been demonstrated. Action 3.1. should aim to achieve best practice going beyond guidelines where feasible and appropriate but this is a matter for consideration in the drafting of the plan. It should be noted that Wicklow County Council as a planning authority does not have full control over all aspects of planning and works as part of an overall

planning framework, operating under national guidelines, with regional structures and other bodies including An Bord Pleanála having distinct areas of jurisdiction.

Wicklow County Council does not believe that preservation orders are the best approach to protecting our water resources. Wicklow County Council plays a key role in the protection of Wicklow water through our work on implementing the River Basin Management plan in County Wicklow. Wicklow County Council will through the plan, working with LAWPRO, to monitor water quality and take target actions to improve water quality throughout the county with the objective of reaching good water quality status for all waters.

Wicklow County Council agrees that natural corridors play a key role in allowing free movement of species and that this is an important consideration in adaptation to Climate Change for Biodiversity. As a result we propose an additional action be added. *Action 5.10 Undertake a study to identify natural corridors in County Wicklow and measures that can be taken to improve connectivity along these corridors and opportunities to increase connectivity between corridors.*

The amount of green space required for new developments is set in the County Development Plan and is guided by national policy which will look at all relevant issues including the need to achieve higher densities and more compact sustainable communities.

All measurements, bans, boycotts and action proposed by the Wicklow Community for Climate and Biodiversity Action have already been addressed in a previous submission by Jennifer Mc Hugo and Keith Scanlon.

**Recommendation:**

*Add Action 5.10 Undertake a study to identify natural corridors in County Wicklow and measures that can be taken to improve connectivity along these corridors and opportunities to increase connectivity between corridors.*

The review of the Biodiversity Action Plan in Action 5.5 should include a focus on the marine environment.

**Sub No. 55: Anna O Rourke**

**Summary of issues raised:**

- Concerned about the impact the roll out of 5G will have on the environment including the removal of trees and an increase in energy usage.

**Response to issues raised in submission:**

This is not a Climate Adaptation issue and should be addressed through other channels, including planning, where there are local concerns about masts and repeaters.

**Recommendation:**

**No action required.**



**Sub No. 56: Cllr. Dermot O Brien**

**Summary of issues raised:**

- Translate the final version of the strategy into plain English

**Response to issues raised in submission:**

Accessibility to the content of the document has been raised previously. While the strategy is clear in the scope and nature of its remit, it is a large document and contains technical language that can be difficult for members of the public. Wicklow County Council intends to extend the executive summary to provide a more detailed user friendly synopsis of the document.

**Recommendation:**

**A better outline of the scope and remit of the document in an extended executive summary will help to make it more accessible.**

**Sub No. 57: Cllr. Jennifer Whitmore**

**Summary of issues raised:**

- Would like to see mitigation take a greater role in the plan.
- Climate Change and biodiversity Loss are interconnected and both must be addressed at the same time. Requests that the WCC Biodiversity Plan be updated and in parallel the Climate and Mitigation Plan
- Requests that Wicklow County Council employs a Biodiversity Officer and as well as Climate Action Officer.
- Develop a Climate Change and Biodiversity website to outline proposed actions and to track implementation.
- Establish a baseline for Council emissions, on a district basis and sectional basis. E.g. number of council houses, energy rating of those houses, set annual target number to upgrade.



- Establish a carbon footprint for overall emissions in Wicklow, based on energy usage, transportation, farming etc.
- Set reduction targets for all actions detailed in the Adaptation Plan e.g. a 40% reduction in WCC's greenhouse gas emissions by 2030.
- To develop a land-use map of Wicklow to identify locations of natural ecosystems.
- Develop a hedgerow plan for the County, with actions to map, protect and develop hedgerows county-wide.
- Prioritise nature based solutions, rather than engineering ones, to address climate change impacts and biodiversity loss.
- Stop Council use of herbicides & pesticides.
- Promote All Ireland Pollinator plan.
- Make our urban areas as environmentally productive as possible (whilst meeting our housing needs) through the development of community parks, allotment areas, planting of urban native woodlands and orchards.
- To develop a series of natural corridors that connect core habitat areas. This may be possible through increased buffer zones for development in riparian areas.
- Protect and conserve floodplains and wetlands with particular recognition of their importance as carbon sinks.
- WCC should use development levies to ensure significant planting of native woodlands, or rewilding of areas, as an 'offset' to developments. This would add value both from a carbon storage and a biodiversity perspective.
- Phase out the use of single-use plastics from all WCC canteens.
- Any events supported, facilitated or organised by WCC will not permit balloon or Chinese lantern releases.
- Implement water conservation campaign in civic buildings.
- Assess the feasibility of green roofs on all new public, operational and social buildings and provide where viable and appropriate
- Expansion of EV public charging stations across the county.
- Ensure EV charging points are installed in all new developments.
- Promotion / development of co-working hubs to facilitate working from locality.
- Use rates scheme to reward businesses with proven environmental benefits.
- Refocus annual budgets to prioritise Climate Change and Biodiversity measures.
- Target funding opportunities at those projects with a defined Climate Change and Biodiversity benefit.

**Response to issues raised in submission:**

It is clear that there is strong support throughout the county for Wicklow County Council to also address mitigation. Mitigation measures are already a part of many work programmes and the Climate Action plan published by the government assigns further actions to local government and also will shift focus in many policy and economic development areas towards mitigation. Wicklow County Council will soon have to develop further actions in this area. It is important that the adaptation strategy recognizes the purpose of the Climate Action Plan and the role intended for Local Authorities to meet targets and contribute to the national climate ambition. Wicklow County Council will include an action to reflect



this. *Action 1.20 Assess the range of and scope of existing mitigation measures already undertaken by Wicklow County Council and those that will be required under the Climate Action Plan.*

Action 5.5 a review of the Biodiversity Plan is already listed as an action. It is clear from this submission and the many others received on biodiversity that there is public support for taking quick action on biodiversity which is closely intertwined with both the underlying causes of climate change and the impact of changing climate. Action 5.5 should be implemented in the short term to allow both plans to work together in parallel.

Recruitment of a Biodiversity Officer relates more to the Biodiversity Plan. It is a matter that the SPC can address through council.

Wicklow County Council's new wicklow.ie website is designed to be a one stop portal for the county. It would be more appropriate to develop a specific section of this website to address Climate Change, providing updates on the implementation of the plan. Add a new action, *Action 6.17 Develop a section of the Wicklow.ie website to provide access to information on Climate Change, the Climate Adaptation Strategy, climate mitigation measures and report on progress towards target within the Climate Adaptation Strategy and the national Climate Action Plan.*

Wicklow County Council has already established a baseline for measurement of its energy consumption and is monitoring and reporting on its annual consumption each year as required for all public service bodies. We have a target to reduce consumption by 33% by 2030 with a further target of achieving a 50% reduction by 2030, based on baseline consumption in 2009. Wicklow County Council is already assessing its housing stock for BER as they come up for reletting. The Climate Action Plan sets ambitious target to retrofit all local authority housing.

Measuring the carbon footprint for Wicklow would be a mitigation measure. Measuring emissions for energy usage, farming transport etc across the county would be beyond the capacity of the organisation. The EPA has responsibility for the compilation of GHG emission figures for Ireland. They are the competent authority for this work. The Climate Change section of the Wicklow.ie website should provide information to the public on climate emissions and how we address them.

The focus of the adaptation strategy is on measures dealing with the impacts of Climate Change rather than on setting targets for mitigation. Wicklow has important targets set as detailed above and will aim to achieve and exceed where possible those targets.

There are a broad range of data sets mapped in the County Development plan and also available through a wide range of sources including EU databases, the EPA's mapping of data sets for the country, the National Biodiversity Centres maps for species distribution. Geo hive from the Ordnance survey allows specific searches at local level for data sets. Using the information should be critical consideration. *Action 5.10 Undertake a study to identify natural corridors in County Wicklow and measures that can be taken to improve connectivity along these corridors and opportunities to increase connectivity between corridors* is already being added following an earlier submission. This would be a

more useful approach for moving forward now in assisting the adaptation of species to a changing climate using existing data sets.

Hedgerows play a key role for biodiversity as remnant habitat and crucially act as corridors facilitating movement of species. It could be argued that thickening of hedgerows could be a more productive biodiversity measure than creation of woodland pockets. The majority of hedgerows in the county are privately owned and not under the care of Wicklow County Council. There are many aspects to hedgerow management to consider and this strategy is not the appropriate vehicle for addressing them fully. This issue should be addressed through the review of the Biodiversity Plan, Action 5.5. It is also something that can be assisted through the new action developed Action 6.11: Develop a steering group to explore and develop common goals and objectives between Wicklow County Council and representatives from the farming, forestry and landowners sectors in rural and upland areas of the county.

Nature based solutions for mitigation and biodiversity fall outside the scope of this strategy. Action 2.3 Integrate climate considerations into the design, planning and construction of all roads, footpaths, bridges, public realm and other construction projects. Make provision to incorporate green infrastructure as a mechanism for carbon offset. 3.3 Assess the role of Natura Sites in creating a more climate resilient environment and undertake a public awareness campaign to highlight their role and 4.5 Investigate best practice in storm runoff attenuation through the use of green infrastructure in urban open spaces. Address how nature based solutions can help to adapt to Climate Change with a more resilient outcome.

A ban on pesticides is not a climate adaptation issue. Concerns have been expressed about its impact on human health and on biodiversity. It could be considered under the review of the Biodiversity Action Plan, Action 5.5. it is also something that the SPC on Climate and Biodiversity could consider bringing to the council separately. As mentioned in the submission it would be worthwhile considering whether any exemptions are required as for invasive species. It would be worthwhile to quantify and qualify current usage by Wicklow County Council in order to assess how and why it is being used.

A pollinator plan should be addressed under the Biodiversity Action Plan in Action 5.5. The National Pollinator plan includes a good model for use in local authorities.

The County Development Plan is the appropriate plan for adjudicating on land use priorities. Some of the issue is addressed in Action 5.1 Undertake and implement an active tree planting programme, with mapping of sites suitable for planting, in the context of climate adaptation in conjunction with an awareness campaign that informs of the benefits to communities in improving air quality, offsetting carbon emissions, promoting biodiversity, limiting flood risk, reducing urban heat, as well as aesthetic value. Wicklow County Council supports the other measures through community grants and Local Agenda 21 environmental partnership grants. *Action 6.6* Ensure that grants to communities fund climate resilient projects, aims to help focus funding more in the direction of climate resilient projects.

For riparian corridors see action listed above in response to developing a land use map. Action 4.7 Ensure that potential future flood information is obtained/generated by way of a Flood Risk Assessment (FRA) and used to inform suitable adaptation requirements within the Development Management process in line with the Guidelines for Planning Authorities on Flood Risk Management (DECLG & OPW, 2009) and Action 4.8 Coordinate with River Basin Coordinators regarding measures and funding/incentives for riparian buffers in priority water bodies also deal with this issue.

Action 5.4 Research and map areas considered beneficial for use as local carbon offset through carbon sequestration and include in Green Infrastructure strategy looks at the role of green infrastructure such as wetlands and flood plains to act as carbon sinks.

Funding for planting of significant areas of woodland and rewilding through development levies would need to be considered under the County Development Plan. The Biodiversity Plan could also be used to address funding needs.

Wicklow County Council has already committed to phasing out the use of single use plastics in its own activities. It is beyond the remit of Wicklow County Council to ban these materials in public. This is a mitigation measure. *Action 6.6* Ensure that grants to communities fund climate resilient projects, aims to help focus funding more in the direction of climate resilient projects could help to influence behaviour where funding is being provided.

Irish Water has an awareness and communications team. They would be the most appropriate body for delivering a public campaign. Wicklow County Council supports schools on water conservation through Green Schools and developed a Water education pack for primary schools.

There are a variety of options in roofing going forward including green roofs for biodiversity and flood attenuation, rain water harvesting and use of photovoltaics. Which is the best option for individual building will depend on a range of factors and which should be addressed on a case by case. The point raised does indicate a new action is required to promote better practice in building taking account of building guidelines. *Add Action 2.9 All new buildings to be built by Wicklow County Council should consider best available practice in ensuring building contribute to climate action through their design considering a range of design options that will include but not be restricted too use of low carbon materials, green roofs, use of photovoltaics, and rain water harvesting taking account of government policy, design standards, and guidelines.*

Wicklow County Council will continue to work with SEAI and ESB networks to enable provision of EV charging points throughout the whole county. This action is more a mitigation measure and is adequately covered in the Climate Action Plan. The provision of charging points for parking spaces should be considered through the County Development Plan guided by national planning guidelines and the Climate Action Plan. While targets are being set for the number of charging points to meet growing

demand there is also a case to be made for all parking spaces to be cabled to facilitate future installation while also ensuring adequate charging points are installed to meet short term demand.

Promotion and development of co-working hubs to facilitate working from their locality is a mitigation measure. This is already actively promoted through the Local Economic and Community Development Strategy.

Wicklow County Council operates under restrictions with relation to rate rebates. A specific grant scheme or assistance to seek funding through an existing grant scheme such as Better Energy Communities or Sustainable Energy Communities would be a better approach.

The refocusing of annual budget to prioritize Climate Change and Biodiversity is a matter for consideration through Action 1.2 and by the elected members in setting the annual budget.

Targeting funding opportunities is already considered in Action 6.5 Ensure that grants to communities fund climate resilient projects.

**Recommendation:**

***Add a new action on information through the Wicklow.ie website. Action 6.17 Develop a section of the Wicklow.ie website to provide access to information on Climate Change, the Climate Adaptation Strategy, climate mitigation measures and report on progress towards target within the Climate Adaptation Strategy and the national Climate Action Plan.***

***Add Action 2.9 All new buildings to be built by Wicklow County Council or on its behalf should consider best available practice in ensuring buildings contribute to climate action through their design, considering a range of design options that will include but not be restricted too use of low carbon materials, insulation of the building fabric, green roofs, use of photovoltaics, and rain water harvesting taking account of government policy, design standards, and guidelines.***

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**Sub No. 58:     Andrea Nolan**

**Summary of issues raised:**

- Make Wicklow a plastic free retail zone
- More litter bins

**Response to issues raised in submission:**

The issue of plastics is not a climate adaptation issue directly though it does relate to overall consumption. We cannot oblige a plastic free retail environment as that would be outside of the remit of Wicklow County Council but Wicklow County Council has worked on waste prevention initiatives and has included a measure on waste prevention under Action 6.10 which addresses waste prevention, resource efficiency and the circular economy. Food waste and plastics are the two primary targets in this area at present. We are promoting the refill.ie campaign and the conscious cup campaign.

Provision of litter bins falls outside the scope of this strategy.

**Recommendation:**

**No further action required.**

**Sub No. 59: Tessa Stewart**

**Summary of issues raised:**

- Convene a Citizens assembly.
- Reference the declaration of an emergency.
- Commit to net zero emissions by 2030.
- Be a leader on Climate Action and Biodiversity.
- The strategy does not address mitigation.
- Need for staff training.
- Leadership from the top.
- Need for more precision in timeframe
- Improve communications and engagement with the community to enlist support and facilitate organisation with wider reporting back into the community.
- Produce a well being index and progress reporting.
- Need a separate plan to build and protect biodiversity in a wider less legalistic sense.
- Coastal defences and flood protection should take a more natural approach and use less concrete.
- Better management of trees, planting and aftercare of saplings.

**Response to issues raised in submission:**

The Citizen Assembly at national level played an important role in getting citizens views documented with a view to shaping policy at national level, helping to bridge the gap between citizens and policy makers. In Wicklow we already have structures in place to encourage a better role for citizens in making

an input to policy. The elected representatives serve as a conduit from their local communities. The Public Participation Network allows citizens and groups to convene meetings that facilitate engagement by all members of the public. The interaction between people in the PPN, elected representatives and staff of Wicklow County Council already has the capacity to deliver the public engagement needed going forward.

The draft Climate Adaptation Strategy put out for consultation was exactly as presented to the Council on the 29<sup>th</sup> of April. The Climate and Biodiversity Emergency was declared after the members voted to put the strategy out to consultation. We can now make amendments suggested through public consultation so will reference the emergency declared in the introduction.

The target for the public sector for 2030 is to reduce energy consumption by 50%. This is a very ambitious and difficult to achieve target but Wicklow County Council intends to achieve it. Net zero by 2030 would not be achievable in the timeframe without a clear pathway to do so and setting a target that is unlikely to be achieved with current available solutions would not be recommended. The Climate Action Plan calls on all of the public sector to lead by example to inspire other to follow.

Wicklow County Council aims to show leadership through the implementation of this plan and in implementing relevant actions in the National Climate Action Plan. It aims to act as a role model stimulating action by others. We will continue to work with community groups and local organisations supporting the development of Climate Action and Biodiversity initiatives at local level.

The document is an adaptation strategy and was not intended to address mitigation. Incorporating mitigation measures into the existing strategy without substantial review would be challenging in the time frame for delivery and would also need to look at evolving policy. The strategy will be amended to take account of the Climate Action Plan which will broaden and strengthen the remit of Wicklow County Council in taking action on climate in addition to the focus here on adaptation. An action to scope existing mitigation measures and those that may arise from the Climate Action Plan will be useful to allow the SPC to address this end of Climate Action giving a baseline for development. *Action 1.20 Assess the range of and scope of existing mitigation measures already undertaken by Wicklow County Council and those that will be required under the Climate Action Plan.*

The issue of staff training is important and has been raised already in a previous submission along with the need for training of elected representatives. There is a case for developing a specific action for a programme of awareness and training for elected representatives, staff and communities on the role we play and how it will be achieved in addressing Climate Action. A new action to develop training should be added to Theme 1 to incorporate training for staff, elected representatives and communities as an action., *Action 21: Develop and deliver training and awareness campaigns for staff, elected representatives and communities on Climate Action.*

Actions 1.1 Establish a Climate Action Steering Group, chaired by a Climate Adaptation Champion at Director of Services level with representatives from across key functions of local authority and the Chair of the Planning, Development and Environmental SPC, and 1.2 Mainstream Climate Action policy as integral consideration in the Corporate Plan objectives providing for the all local authority activities and the delivery of functions and services across

the administrative area, and 1.3 Ensure that Climate Action is listed as a standing item on the agenda of the Management Team meetings give Climate Action the highest possible attention in the organisation and are designed to ensure leadership from the top.

Timelines have been projected based on available information and priority. Theme 1, Action 5 does require the development of service indicators for adaptation measures. Budgeting, resources, and timeframes for review of other policies and plans will play a key role in shaping delivery. It would not be appropriate to prejudge decision that have yet particularly at local but also at national level on funding that will be allocated. Key factors will include the recruitment of a Climate Action Officer, the establishment of both the steering group and the SPC. It should then be feasible for the development of a precise timescale with indicators by early 2020 allowing for full consultation with relevant services, budgeting and allocation of resources. Wicklow County Council will put in text clarifying time frames in terms of what short, medium and long mean.

Action 6.1 Through the public participation network raise awareness of the impacts of climate change and ways for communities to increase responses and resilience to these impacts is the first community health and well being action. We are also adding a new action Action 6.17 Develop a section of the Wicklow.ie website to provide access to information on Climate Change, the Climate Adaptation Strategy, climate mitigation measures and report on progress towards target within the Climate Adaptation Strategy and the national Climate Action Plan in response to a prior submission. A Special policy committee on Climate and Biodiversity is being created and will play a role in ensuring dissemination of information back out into the wider community.

Where well being indexes and equivalent measurements are developed they are usually done independently of the organisation being measured. It is understood that national indicators will be developed to measure all local authorities' progress and that of other sectors. CARO will play a role in defining common measurement indicators going forward.

Action 5.5 calls for a review of the Biodiversity Action Plan. There are many issues in submissions already that need to be considered under the review of the Biodiversity Action Plan and related local plans. The point made here about less legalistic measures reflects many of the actions already requested and should be noted in recommendations for follow through.

Using a more natural approach is addressed through Action 3.3 Promote the integrated planning, design and delivery of green infrastructure (including urban greening) through appropriate provisions in planning policies, development standards, infrastructural, public realm and community projects, 3.5 Assess the role of Natura Sites in creating a more climate resilient environment and undertake a public awareness campaign to highlight their role and 4.5 Investigate best practice in storm runoff attenuation through the use of green infrastructure in urban open spaces.

Wicklow County Council agrees that protecting and enhancing tree cover will be an important cross cutting climate action measure. The issue of maintaining trees will be addressed through Action 5.1 on developing a tree planting programme and 5.4 on developing a tree policy. Wicklow County Council has no involvement in planting of trees in wetland and peatland sites. Action 6. 11: Develop a steering group to explore and develop common goals and objectives between Wicklow County Council and



representatives from the farming, forestry and landowners sectors in rural and upland areas of the county. Is being added to the strategy in response to a prior submission and will help to address the issue of where tree planting is feasible and can be encouraged. Wicklow County Council encourages community involvement in the planting and aftercare of trees, distributing trees to community groups each year to mark National Tree Week and also providing grants for residents associations for tree planting.

**Recommendation:**

**In reviewing the Biodiversity Action Plan Action 5.5 it should be noted that there is significant demand throughout the submissions received for this strategy for a supplement to a legal approach to Biodiversity planning to incorporate more practical measures that can help to stem biodiversity loss.**



**Sub No.60: Keith Scanlon**

**Summary of issues raised:**

- Requests that Section 5.6, P96 High level goals, Point 4 Capitalising on opportunities: Projected changes in climate may result in additional benefits and opportunities for the local area and these should be explored and capitalised upon to maximise the use of resources and influence positive behavioural changes be deleted as the impacts of Climate Change will be overwhelmingly negative.

**Response to issues raised in submission:**

Benefits and opportunities were mentioned under high level goals precisely because this point is often over looked and is something to consider in moving County Wicklow forward. Wicklow County Council recognises that vulnerabilities and threats to our communities, environment and economy are far more likely and that is why almost all the actions are focused on preventing, minimizing or adapting to negative impacts. There are benefits and opportunities for County Wicklow which can help us to achieve a lower carbon economy and more resilient communities providing a better environment, better social conditions and economic opportunities for all. Examples would include job creation in renewable and retrofitting of buildings displacing high fossil fuel consumption, promotion of County Wicklow as an aviation free holiday destination reducing individual carbon footprints, promoting local produce and building chains of supply from local producer to local businesses and consumers as the new food strategy does, reducing food miles. Benefits and opportunities should be pursued where they lower carbon consumption and increase community resilience. Presenting an opportunity to build a better future is critical to engage all.. It is already proposed to add a new Action 6.13 Review Wicklow Food Strategy to assess which goals and actions, including those developing local products and local markets can help to deliver on Climate Action.



**Sub No.61: Elizabeth Battye**

**Summary of issues raised:**

- That Wicklow County Council request the Department of Environment to Pilot a bottle and can deposit scheme in County Wicklow.
- That Wicklow County Council erect drinking water fountains in public areas throughout the county.
- Choose alternative strategies to unnecessary tree felling.
- Seek funding to establish cycle lanes in urban areas.
- Use land bank to plant pollinator friendly plants.
- Work with schools to promote the use of buses bicycles and pedestrian passage to school.

**Response to issues raised in submission:**

A deposit return scheme for bottle and cans should be addressed at nation level rather than local level to ensure full participation by all players including the producers, retailers, REPAK as well local authorities. While this is not an adaptation measure Wicklow County Council is supportive of the idea. Wicklow works through the national waste prevention programme with the EPA and Clean Technology Centre on waste prevention and has included an action in this area. Action 6.10 on awareness of the role of waste prevention, resource efficiency and the circular economy addresses this issue.

Wicklow County Council is currently working on an EPA funded project to support the refill.ie campaign which includes installing water bottle filling fountains in secondary schools. Greystones was the first town in Ireland to roll out a network of public drinking fountains and it is hoped that more can be installed. It is covered under Action 6.10 An awareness campaign on the role of waste prevention, resource efficiency and the circular economy.

Wicklow County Council agrees that protecting and enhancing tree cover will be an important cross cutting climate action measure. The issue of maintaining trees will be addressed through Action 5.1 on developing a tree planting programme and 5.4 on developing a tree policy. The tree policy will focus on measures to maintain trees and avoid their removal.

Issues relating to transport including cycling, footpaths, public transports and reducing dependence on cars should be dealt with in a coordinated manner allowing for better prioritisation in spending. A new action will be added in response to a previous submission to develop a more coordinated approach. Action 2.9 Develop a Sustainable Transport Plan which will address public transport, cycling and pedestrian infrastructure, measures to reduce car dependence and measures to reduce carbon emissions from car transport.

Pollinator planting is a common theme in submissions. It is not a direct adaptation measure but will be addressed through Action 5.5 review of the Biodiversity Action Plan. The National pollinator plan has

guidelines for local authorities have guidelines for local authorities which can help implement policy development in this area.

Wicklow County Council works with school on sustainable transport through Green Schools. We are adding a new action relating to Green School to reflect its importance. Action 6. 12 Support the delivery of Climate Action Awareness and education in County Wicklow schools through Green Schools and associated Environmental Awareness initiatives.

**Recommendation: Issues already addressed and no new actions arising.**

**Sub No.62: Finnbar Howell**

**Summary of issues raised:**

- Mitigating the damage is not sufficient and trend reversal by a number of means is a necessity.
- A full plan review by CARO should be carried out every three years rather than every 5 years.
- There is no mention of an all-out ban on single use plastics or other harmful pollutants in regular use.
- The Council should support local climate awareness and action events by facilitating advertising of those events in regular public spaces.
- Serious consideration should be given to the re-introduction of wolves in the Wicklow Mountains to control the deer population which would result in the improvement of the local flora and fauna and the increase in other herbivore species. This should be done in a participatory fashion.
- Connect wild areas in different parts of the country with natural corridors.
- Financial instruments should be developed to allow local individuals and groups to collectively invest in lucrative large-scale renewable energy projects.
- Actively involve farmers in the transition to a greener economy. There is no mention of farmers in Chapters 5 and 6 of the plan and this is a gross oversight. Awareness campaigns of the profitability of investments in green farming and renewable energy should be made to farmers, in an effort to curb their grid energy usage significantly.
- Investigations should be made into potential areas in Wicklow's mountains to increase the pumped hydro storage capacity, which is essential to the energy transition.
- A framework should be developed to internalise future costs of climate change and take those costs into account when making climate decisions. Investments in renewable resources and sustainability should take into account the cost of taking no action.

**Response to issues raised in submission:**

This document is a climate adaptation plan and is not intended to directly deal with mitigation.

It is clear that there is strong support throughout the county for Wicklow County Council to also address mitigation. Mitigation measures are already a part of many work programmes and the Climate Action plan published by the government assigns further actions to local government and also will shift focus in many policy and economic development areas towards mitigation. Wicklow County Council will soon have to develop further actions in this area. It is important that the adaptation strategy recognizes the purpose of the Climate Action Plan and the role intended for Local Authorities to meet targets and contribute to the national climate ambition. Wicklow County Council will include an action to reflect this. *Action 1.20* Assess the range of and scope of existing mitigation measures already undertaken by Wicklow County Council and those that will be required under the Climate Action Plan.

The timeframe of five years for the plan is five years in order to allow full development of adaptation measures but we recognise that further areas for action will be developed throughout its life time which will require continuous development of the programme of action. The National Climate Action Plan has been published since this draft was written and already we are incorporating relevant actions into our activities as a local authority as mentioned above. Many actions in this strategy will facilitate identification for further action which should be addressed as soon as feasible rather than waiting for review. The creation of a dedicated SPC on Climate and Biodiversity will allow new policy and actions to be developed as the need arises.

The banning of single use plastics or other pollutants is outside the remit of this strategy on Climate Adaptation. We do recognise that resource consumption is a cross cutting Climate Action measure and have included an action 6.10 An awareness campaign on the role of waste prevention, resource efficiency and the circular economy in climate action to demonstrate how it can assist in creating a more efficient and resilient local authority and strengthen the resilience of the Wicklow communities.

Wicklow County Council will continue to support local climate awareness and action events through the Environmental Awareness Office and through engagement with the Public Participation Network for County Wicklow. Wicklow County Council's new wicklow.ie website is designed to be a one stop portal for the county. In response to a previous submission we already propose to add a new action, *Action 6.17* Develop a section of the Wicklow.ie website to provide access to information on Climate Change, the Climate Adaptation Strategy, climate mitigation measures and report on progress towards target within the Climate Adaptation Strategy and the national Climate Action Plan. This section along with the council's social media accounts can be used to share information on events.

Wicklow County Council would not be the appropriate body to make a decision about and implement and operation on the reintroduction of wolves. The proposal would be better addressed to the NPWS who have the expertise to assess its viability and make recommendations to government.

Wicklow County Council agrees that natural corridors play a key role in allowing free movement of species and that this is an important consideration in adaptation to Climate Change for Biodiversity. As a result we have already proposed an additional action be added in response to a previous submission. *Action 5.10* Undertake a study to identify natural corridors in County Wicklow and measures that can be

taken to improve connectivity along these corridors and opportunities to increase connectivity between corridors.

Renewable energy is a mitigation rather than a adaptation measure. Wicklow County Council is working with the first of the Sustainable Energy Communities that have been set up in Wicklow and will work to stimulate more interest going forward. Wicklow County Council will continue to work on assisting communities to access available programmes and funding that can facilitate renewable energy.

Wicklow County does not play a direct role in offering advisory services to the farming community which is covered by other bodies including Teagasc and the DAFM. Wicklow County Council recognises that Coillte, the NPWS, the farming community and landowners will be key partners in delivering adaptation and mitigation measures for County Wicklow, that Wicklow County Council does not decide for landowners on all land use activities, and that we will need to engage and work more closely with this sector in order to strengthen our capacity to protect resources for all in County Wicklow. An action to facilitate this should be incorporated to the strategy under Theme 6 Community Health and Well Being. Action 6. 11: Develop a steering group to explore and develop common goals and objectives between Wicklow County Council and representatives from the farming, forestry, Parks and Wildlife Service and landowners sectors in rural and upland areas of the county.

Investigating the feasibility of creating more pump storage in County Wicklow would be outside the remit of Wicklow County Council. Wicklow County Council as a planning authority will be guided by national policy and the elected members of Wicklow County Council on facilitating the development of renewable in the county.

Green Procurement and developing a good working framework for assessing climate criteria in the costing and tendering process is a key priority in the new National Climate Action Plan. The plan commits local authorities to delivering a green procurement approach which incorporates carbon pricing and climate criteria. While largely a mitigation measure it worth looking at Green procurement as an overarching measure and including it as a new action which has been added already in light of a previous submission on the matter. *Action 1.22* Develop a Green Procurement strategy for the organisation which will stipulate where specific conditions are to be assessed prior to procurement.

**Recommendation: The submission raised several important issues, some of which have been addressed through actions developed in response to previous submissions, some of which are covered by existing and proposed mitigation measures and some outside the remit of Wicklow County Council.**

**Sub No.63: Wicklow Planning Alliance (Dr. Craig Bishop)**

**Summary of issues raised:**

In preparing such a plan it is necessary to understand what it is seeking to achieve.

- WCC needs to be prepared for a changing climate that will bring extreme weather events that disrupt services and damage infrastructure.
- Wicklow society and economy needs to adapt to function without adding any carbon at all in the very near future.

WCC has a primary role in reaching both goals above and the key to success will be a strong sense of community with the support of the Council.

The guiding principles should be:

- Building resilience. The proposed Climate Officer will have an active role in co-ordinating community effort. The council will need to be proactive and lead the way.
- Decisions must be made on LOCAL information.
- Support circular and low carbon opportunities.
- Climate proofing of ALL council activities.

With these principles in mind it is suggested that:

- The high levels goals listed in the current draft should be reversed and rewritten in plain English.
- Make good use of local expertise.
- Set targets and indicators including carbon emissions.

#### **Response to issues raised in submission:**

Reversing the order or content of the high level goals may cause confusion at this point. Wicklow County Council has produced a document which uses a lot of technical language with precision as its main target audience has always been the staff who will implement it. Accessibility to the content of the document has been raised previously. While the strategy is clear in the scope and nature of its remit, it is a large document and contains technical language that can be difficult for members of the public. There is a recognized need to simplify the message that we deliver publicly on this work. We will look at providing a more detailed executive summary of the document which will provide a more accessible way for people to inform themselves about what the strategy aims to achieve.

Wicklow County Council also recognise that this strategy is a first step and that one of its key functions will be to ensure changes are made to all other relevant, plans and policies, to ensure that as an organisation we change or approach in governance and operations ensuring that Climate Change becomes a priority consideration. The public engagement with this strategy through the consultation process has been huge demonstrating the wiliness to get involved. Many of the submissions raised issues that can best be addressed through other plans such as the Biodiversity Action Plan. Wicklow County Council intends to bring forward these submissions for review under the relevant plans or polices. The Public Participation Network now offers us greater scope to engage with and make use of local expertise and knowledge.

Theme 1, Action 5 does require the development of service indicators for adaptation measures. Budgeting, resources, and timeframes for review of other policies and plans will play a key role in shaping delivery. It would not be appropriate to prejudge decision that have yet particularly at local but also at national level on funding that will be allocated. Keys factors will include the recruitment of a Climate Action Officer, the establishment of both the steering group and the SPC. It should then be feasible for the development of a precise timescale with indicators by early 2020 allowing for full consultation with relevant services, budgeting and allocation of resources. Wicklow County Council will put in text clarifying time frames in terms of what short, medium and long mean.

**Recommendation: Good points raised particularly on the need to communicate the content of this strategy in plainer English and the need to continue to engage with local expertise and communities throughout the implementation of this plan. No new actions beyond those already suggested in response to prior submissions required.**

**Sub No.64: Department of Culture, Heritage and the Gaeltacht – Built Heritage**

**Summary of issues raised:**

The Development Applications Unit have highlighted a number of issues regarding protection of architectural heritage that are recommended and should be taken into account to identify the architectural heritage at risk in the area, to assess the vulnerability to climate change and develop disaster risk reduction policies for direct and indirect risks. The strategy should undertake to:

- Identify the architectural heritage in local authority areas.
- Include objectives to carry out climate change risk assessments for the historic structures and sites in the area.
- Include objectives to develop disaster risk reduction policies addressing direct and indirect risks to the architectural heritage in the area.
- Include objectives to develop resilience and adaptation strategies for the architectural heritage in the area.
- Develop the skills capacity within the local authority to address adaptation/mitigation/emergency management issues affecting historic structures and sites.

**Response to issues raised in submission:**

These matters should be considered in the review of the Heritage Plan, Action 3.1.

**Recommendation: These matters should be considered in the review of the Heritage Plan, Action 3.1.**

**Sub No.65: Department of Culture, Heritage and the Gaeltacht – Archaeological Observations**

**Summary of issues raised:**

A set of broad policy principles for the protection of archaeological heritage were set out in a document “Framework and Principles for the Protection of the Archaeological Heritage” published in 1999. The following key policy principles, set out in this document, should be followed in the Strategy:

- The National Monuments Acts will be used to the fullest possible extent, in accordance with relevant international conventions, to secure the protection of the archaeological heritage.
- Gathering of information about the archaeological heritage should not destroy any more of that heritage.
- There should always be a presumption in favour of the avoidance of a development’s impact on the archaeological heritage.
- Preservation in-situ of archaeological sites must be presumed to be the preferred option.
- Where archaeological sites or monuments have to be removed as a result of development it is essential that the approach of preservation by record be applied i.e.: that there be appropriate archaeological excavation and recording.
- Proper archaeological assessment can ensure that the most appropriate approach to archaeological preservation is adopted.

**Response to issues raised in submission:**

The protection of monuments and archaeology sites is already adequately covered in through the planning system, particularly in the County Development plan and the Heritage Plan which are the appropriate documents for safe guarding them through inappropriate development.

**Recommendation: No further action required as already addressed through the County Development Plan and Heritage Plan.**

**Sub No.66: Geological Survey of Ireland**

**Summary of issues raised:**

- Encourages GSI’s mapping, available at [www.gsi.ie](http://www.gsi.ie), to be consulted when creating the EIAR and in general has a wide range of maps and databases.
- With regard to Flood Risk Management, there is a need to identify areas for integrated constructed wetlands and GSI’s National Aquifer and Recharge maps are recommended.
- Recommends GSI’s Geothermal Suitability maps to determine the most suitable type of ground for ground source heat collector for use with heat pump technologies.

- Highlights the consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process and the GSI's maps in their Minerals section of the website should be consulted in this regard.

**Response to issues raised in submission:** The content of this submission is noted but does not require any additions or changes to the strategy. No EIAR is required at present.

**Recommendation:** No action required.

**Sub No.67: Delgany Community Council**

**Summary of issues raised:**

- Strategy fails to establish the role local government must play to enable a transition to a low or zero carbon economy.
- Strategy should be more specific and transparent on how it will support carbon reduction initiatives.
- Ireland and Wicklow could be a Climate Change leader, and a clean Energy Super Power.
- WCC to be proactive in delivering sustainable communities by encouraging co-operative and affordable housing through compact urban regeneration, town and village infill and on brown field sites.
- WCC to adopt multi dimensional living standards framework for measuring residents' well-being.
- WCC to provide a commitment and timeline to develop a mitigation strategy.
- Expand the Green Schools programme.
- Wicklow to be a magnate for clean energy technologies.
- Establish a Climate Economy to shape all Procurement Policy.
- Land use zoning activities and policies that are compatible with a transition to a zero-carbon economy.
- WCC Local Area Plans should provide broader land use policies to incorporate biodiversity issues.
- Have micro-generation and community-owned -generation of electricity available and enable the National Grid to purchase that energy.
- Ban oil and gas boilers from new houses.
- Provide electric mini-buses for school children and shoppers to reduce need for individual car use.
- Protect the Irish Sea as a Marine Protected Area (MPA) for sustainable fishing only.
- Extend provision of Park & Ride facilities.
- Provision of electric car charging points.
- WCC to provide free of charge spaces for use to grow a circular economy and upcycling industries.
- WCC to commit to a cycling network and infrastructure, including a council Cycle Project Officer.



- WCC to demonstrate visible action supporting the transition to low-carbon future.
- Have the Government instruct the IDA to market Ireland as a clean energy power as opposed to a tax haven.
- Promote and support individuals reducing their carbon footprint.
- Increase Government grants for home energy efficiency upgrade schemes
- Develop Wicklow Garden of Ireland food plan – based on lowering carbon footprint of Wicklow produce.
- Implement a weekly meat-free day in WCC canteens.

Issues that require clarification:

#### **Response to issues raised in submission:**

Wicklow County has produced a Climate Adaptation Strategy as required by statute. It did not set out to address mitigation measures in this strategy. It is clear that there is strong support throughout the county for Wicklow County Council to also address mitigation that will help attain a low carbon transition within its remit and assist where feasible others to achieve that goal. Wicklow County Council is already working with Sustainable Energy Communities in County Wicklow and will continue to support these communities and encourage others to engage in the programme. Mitigation measures are already a part of many work programmes and the Climate Action plan published by the government assigns further actions to local government and also will shift focus in many policy and economic development areas towards mitigation. Wicklow County Council will soon have to develop further actions in this area. It is important that the adaptation strategy recognizes the purpose of the Climate Action Plan and the role intended for Local Authorities to meet targets and contribute to the national climate ambition. Wicklow County Council will include an action to reflect this. *Action 1.20* Assess the range of and scope of existing mitigation measures already undertaken by Wicklow County Council and those that will be required under the Climate Action Plan.

Wicklow County Council is supportive of renewable energies and has facilitated through the planning process the development of renewables where feasible and mindful at the same time of protecting key uplands areas and the views of local communities and their elected representatives. We share the vision of Wicklow being a county that can meet all of its energy needs and more through renewable going forward.

Wicklow County Council must work to national guidelines and regional plans for the Greater Dublin Region in developing its land use planning as well as being guided by the input from elected members. The focus of planning policy is to promote housing development in the key larger towns in order to create more sustainable communities which can be serviced with more sustainable travel options. This involves higher density development, infill and development of brown field sites. The County Development Plan, and associated local development plans, is the more appropriate plan for addressing housing development going forward.

Wicklow County Council will be guided through national policy on methodologies for measuring well being to ensure data is comparable with other local authorities. CARO will play a role in developing measurement for progress on implementation of this strategy

A commitment to mitigation is given above and it is intended to implement this measure in the short term.

Wicklow County Council was one of the first local authorities in Ireland to work with An Taisce on Green Schools and have assisted most schools in the county to attain at least one green flag. Green schools is a core part of the Environmental Awareness programme and will play a key role in delivering awareness and action at local level. An action to support continued development of awareness on Climate Action through Green Schools within Wicklow schools will be added in response to a previous submission : Action 6. 12 Support the delivery of Climate Action Awareness and education in County Wicklow schools through Green Schools and associated Environmental Awareness initiatives.

Making Wicklow a magnet for clean energy technologies is challenging but worth pursuing. The Local Enterprise Office plays a key role in assisting the development of new enterprises in County Wicklow. Clean Energy Technology is an important growth area and warrants attention by the LEO. A new action should be added, *Action 6.18 Create a database of clean technologies operating in Wicklow, technologies offered elsewhere in Ireland and new technologies being developed outside of Ireland as a tool to focus attention on this sector in County Wicklow.*

The Climate Action Plan commits local authorities to delivering a green procurement approach which incorporates carbon pricing and climate criteria. While largely a mitigation measure it worth looking at Green procurement as an overarching measure and including it as a new action which has already been developed in response to a prior submission. Action 1.22 Develop a Green Procurement strategy for the organisation which will stipulate where specific conditions are to be assessed prior to procurement.

Land use planning and zoning discussed earlier is best dealt with through the County Development Plan.

Wicklow County Council is undertaking local biodiversity action plans in collaboration with communities as resources allow. Land use planning is incorporated in local area plans and is guided by the County Development Plan.

Wicklow County Council is not the appropriate body to facilitate access to the national grid for local generation which should be addressed by ESB networks guided by national policy and supports.

Banning oil and gas boilers is a mitigation measure and is outside of the remit of Wicklow County Council. It should be noted that the new Climate Action Plan proposes they will be phased out. Wicklow County Council has explored alternative technologies in developing its own housing stock in recent years including the use of air to heat pumps in the most recently built houses.

The provision of bus services is outside the remit of Wicklow County Council.

Declaring a Marine Protection Area is outside of the remit of Wicklow County Council and should be addressed by the DAFM and the NPWS.

Wicklow County Council is currently looking at the issue of park and ride facilities following on from the commuter survey undertaken in 2018. Action 6.8 Explore feasibility of augmenting public transport and cycle routes within the County, including park and rides is relevant to this submission.

Wicklow County Council will continue to work with SEAI and ESB networks to enable provision of EV charging points throughout the whole county. This action is more a mitigation measure and is adequately covered in the Climate Action Plan.

Promoting the circular economy is covered by Action 6.10 An awareness campaign on the role of waste prevention, resource efficiency and the circular economy in climate action to demonstrate how it can assist in creating a more efficient and resilient local authority and strengthen the resilience of Wicklow communities. Wicklow County Council is unique in providing space in its recycling centres to work with social enterprise and we would hope to continue to develop these spaces as opportunities arise.

Wicklow County Council is already committed to the provision of cycling infrastructure Recruitment of a designated cycling officer . Issues relating to transport including cycling, footpaths, public transports and reducing dependence on cars should be dealt with in a coordinated manner allowing for better prioritisation in spending. A new action will be added in response to a previous submission to develop a more coordinated approach. Action 2.9 Develop a Sustainable Transport Plan which will address public transport, cycling and pedestrian infrastructure, measures to reduce car dependence and measures to reduce carbon emissions from car transport. Recruiting a designated cycling officer would not be warranted when transport issues require a more integrated approach.

Wicklow County Council is committed to a low carbon future which as a mitigation measure falls outside this document. It is committed to meeting target to reduce its own emission under the National Climate Action Plan and assisting communities through facilitating other actions in the plan notably the Sustainable Energy Communities, electric vehicle charging points, and the retrofitting of local authority housing stock.

Wicklow County Council does not direct the government on economic and industrial development policy but will welcome the opportunity to promote cleaner technologies in Wicklow going forward.

**THEME 6: COMMUNITY HEALTH AND WELLBEING** with the Objective: To build capacity and resilience within communities aims to assist people at community level to lower their carbon footprint by taking actions that will reduce emissions. It includes input from Community and Economic Development, the Environmental Awareness Office and the Public Participation Network.

It is beyond the remit of Wicklow County Council to instruct the government to increase grants to householders but we would hold the view that increased financial supports will be needed in order to implement measures in the Climate Action Plan and this strategy.

The food strategy recently published by Wicklow County Council aims to assist the development of farmers markets and the linked need to support and assist development of local produce. Food is an important cross cutting Climate action issue. The food strategy should be assessed to identify how it can assist in delivering Climate Action identifying which goals can help us deliver Climate Action. A new

Action should be added Action 6.13 Review Wicklow Food Strategy to review which goals and actions, including those developing local products and local markets can help to deliver on Climate Action.

The Wicklow County Council canteen provides vegetarian options on a daily basis.

There are benefits and opportunities for County Wicklow which can help us to achieve a lower carbon economy and more resilient communities providing a better environment, better social conditions and economic opportunities for all. Examples would include job creation in renewable and retrofitting of buildings displacing high fossil fuel consumption, promotion of County Wicklow as an aviation free holiday destination reducing individual carbon footprints, promoting local produce and building chains of supply from local producer to local businesses and consumers as the new food strategy does, reducing food miles. Benefits and opportunities should be pursued where they lower carbon consumption and increase community resilience. Presenting an opportunity to build a better future is critical to engage all.. It is already proposed to add a new Action 6.13 Review Wicklow Food Strategy to assess which goals and actions, including those developing local products and local markets can help to deliver on Climate Action.

It is the actions that stem from the high level goals that will need to be monitored rather than the goals themselves.

Theme 1, Action 5 does require the development of service indicators for adaptation measures. Budgeting, resources, and timeframes for review of other policies and plans will play a key role in shaping delivery. It would not be appropriate to prejudge decision that have yet particularly at local but also at national level on funding that will be allocated. Keys factors will include the recruitment of a Climate Action Officer, the establishment of both the steering group and the SPC. It should then be feasible for the development of a precise timescale with indicators by early 2020 allowing for full consultation with relevant services, budgeting and allocation of resources. Wicklow County Council will put in text clarifying time frames in terms of what short, medium and long mean.

The Climate Action Officer will report to a Director of Service, the Chief Executive and the Climate and Biodiversity SPC.

Wicklow County Council has chosen to assess its fleet needs as a first step in order to then address the target for conversion to electric. We need to assess suitability for conversion and when stock will be due for replacement in order to then set precise targets.

Action 2.5 Undertake a Risk Assessment of road infrastructure in the area to identify the severity of climate change risks on their function and condition. The risk assessment should provide for an understanding and quantification of risks posed. The findings should be integrated into decision making processes, road infrastructure programmes and investment strategies will cover bridges under the remit of Wicklow County Council.

Action 4.8 Coordinate with River Basin Coordinators regarding measures and funding/incentives for riparian buffers in priority water bodies aims to look at the role rivers can play in attenuating flooding with a whole of catchment approach. The farming community, Coillte, the NPWS and landowners will be key partners in delivering adaptation and mitigation measures, and that we will need to engage and

work more closely with this sector in order to strengthen our capacity to protect resources for all in County Wicklow including upland rainfall attenuation. An action to facilitate this should be incorporated to the plan under Theme 6 Community Health and Well Being. Action 6. 11: Develop a steering group to explore and develop common goals and objectives between Wicklow County Council and representatives from the farming, forestry, Parks and Wildlife Service and landowners sectors in rural and upland areas of the county.

The food strategy has already been mentioned which will look at local produce.

Planning operates within planning guidelines and will continue to do so, adapting to the evolution of planning guidelines.

The aim of the strategy is to ensure that going forward Green infrastructure is given more attention and that there is more focus on its role at the planning stage.

Concerns about individual management issues with relation should be brought to the attention of the relevant municipal district office. With limited resources for the issue Wicklow County Council has prioritised identifying locations marking them to try and prevent the cutting of them which can cause further spreading. Wicklow County Council will be undertaking works to eradicate Japanese knotweed when and where funding permits on accessible public realm sites.

Wicklow County Council agrees that the Circular Economy is of huge importance with resource consumption to often overlooked in Climate Action. A new action should be added, *Action 6.18 Create a database of clean technologies operating in Wicklow, technologies offered elsewhere in Ireland and new technologies being developed outside of Ireland as a tool to focus attention on this sector in County Wicklow*

**Recommendation:** *Add new action 6.18 Create a database of clean technologies operating in Wicklow, technologies offered elsewhere in Ireland and new technologies being developed outside of Ireland as a tool to focus attention of this sector in County Wicklow.*

**Sub No. 68: Newtownmountkennedy Community Forum**

**Summary of issues raised:**

- Strategy lacks clearly defined goals and timeframes.
- Climate Action Officer needs to have authority over all sections of Wicklow County Council.
- The SEAI SEC scheme should change to allow for professional assistance being provided as opposed to just voluntary man hours.
- Strategy should improve the recycling service, bottle bank service and extend bring centres to include it other materials, e.g. newspapers, crisp packets.
- Improve public transport and greenways.

- County Development Plan needs to create initiatives and put more funding into combating the Climate Emergency.
- Introduce a rates rebate for businesses that demonstrate reduced energy usage/increase recycling.
- Use development contributions to fund social housing insulation and heating upgrades.

**Response to issues raised in submission:**

Timelines have been projected based on available information and priority. Theme 1, Action 5 does require the development of service indicators for adaptation measures. Budgeting, resources, and timeframes for review of other policies and plans will play a key role in shaping delivery. It would not be appropriate to prejudge decision that have yet particularly at local but also at national level on funding that will be allocated. Key factors will include the recruitment of a Climate Action Officer, the establishment of both the steering group and the SPC. It should then be feasible for the development of a precise timescale with indicators by early 2020 allowing for full consultation with relevant services, budgeting and allocation of resources. Wicklow County Council will put in text clarifying time frames in terms of what short, medium and long mean. It is understood that national indicators will be developed to measure all local authorities' progress and that of other sectors. CARO will play a role in defining common measurement indicators going forward.

The Climate Change Officer is envisaged as a high level position who will report to the Chief Executive but it is the Climate Steering Group and newly created Climate and Biodiversity SPC who will ensure that implementation of the strategy across the organisation.

Changing the terms of the SEAI SEC is beyond the remit of Wicklow County Council but we note that mentoring is provided for SEC's and also that Wicklow County Council is providing support through our appointed energy consultants for communities developing energy master plans.

Bottle banks are not an adaptation issue and should be dealt with through more appropriate channels with waste management.

The issue of public transport and green ways is explored in several Actions. Action 6.8 Explore feasibility of augmenting public transport and cycle routes within the County, including park and rides. Action 3.1 Identify and integrate climate change as a critical consideration and guiding principle informing all plans, strategies and policies prepared by the Council including the core strategy of the County Development Plan, Local Area Plans, Heritage Plan, Master plans, Transportation Plans, Tourism and Economic Plans. Action 5.2 Integrate natural borders/buffers as an integral component of the design of greenways, tracks and trails and amenity areas to promote natural enhancement Wicklow County Council that great connectivity can help us to become less car dependent.

The County Development Plan does not provide funding but does set the key strategic goals for development and can as a result influence the allocation of funding. Action 3.1 above includes a review of the plan.

**Recommendation: No further action required.**

**Sub No. 69: Lynsey Lynch**

**Summary of issues raised:**

- Council Staff and other government staff should be given biodiversity training.
- Weeds should not be sprayed as they die off in the winter and are a source of food for insects.
- Ban Roundup
- Certain actions of Coillte need to be addressed: deforestation, chemical spraying that finds its way into water courses, obligation to plant more broad-leaf native species of trees.
- Increase biodiversity by planting wildflowers on roundabouts, verges etc.
- Make native Irish wildflower seed bombs available locally.
- Educate public about appropriate times to cut/prune shrubs and plants.
- Introduce a biodiversity, conservation and nature syllabus in schools.
- Educate public through a leaflet drop on biodiversity.

**Response to issues raised in submission:**

All of the issues raised are biodiversity issues rather than Climate Adaptation issues and should be considered under Action 5.5 Review Bio-diversity Plans / habitat conservation strategies, plans and projects to ensure that: all risks from adverse climate change have been identified; future changes are assessed and measures employed to address issues identified carbon capture within habitats is considered.

Banning the spraying of weeds and Roundup is not a Climate Adaptation measure but it is something that could be looked at by the Climate and Biodiversity SPC as part of the response to the Climate and Biodiversity emergency.

It should be noted that the Environmental Awareness Office of Wicklow County Council works closely with schools on the theme of Biodiversity through Green Schools and has provided funding for gardening and workshops among other projects to help them develop biodiversity in the curriculum.

**Recommendation: No further action required.**

**Sub No. 70: Labour Party, Greystones Ross Connolly Branch**

**Summary of issues raised:**

- Supports the strategy, particularly theme 3 and 5.



- Supports the actions to save adult trees, plant more trees,
- Have more allotments and allow for bio diverse areas to remain construction free.
- Changing from fossil fuels is necessary but the Council and the Government must provide financial assistance help homeowners.
- The Council's decision against increasing car charging points in Greystones Municipal District seems inconsistent with actions militating against climate change.

**Response to issues raised in submission:**

The recently produced food strategy discusses allotments. Food is an important cross cutting Climate action issue. The food strategy should be assessed to identify how it can assist in delivering Climate Action identifying which goals can help us deliver Climate Action. It is already proposed to include a new Action 6.13 Review Wicklow Food Strategy to review which goals and actions, including those developing local products and local markets can help to deliver on Climate Action. This action should be further updated to reference the role of allotments and should now read Action 6.13 Review *Wicklow Food Strategy to review which goals and actions, including those developing local products and local markets or allotments can help to deliver on Climate Action*

Increased financing of retrofitting of homes for householders is a decision that would need to be made at government level rather than through local government.

Wicklow County Council will continue to work with SEAI and ESB networks to enable provision of EV charging points throughout the whole county. This action is more a mitigation measure and is adequately covered in the Climate Action Plan.

**Recommendation:** Update the proposed new action on the Food Strategy to include a reference to allotments and now read Action 6.13 Review *Wicklow Food Strategy to review which goals and actions, including those developing local products and local markets or allotments can help to deliver on Climate Action.*

**Sub No. 71:** **Stephen McNabb**

**Summary of issues raised:**

- The adopted Adaptation Strategy should note the recent declaration of a Climate Emergency by Wicklow County Council.
- The term "climate breakdown" is ubiquitous in the Government's "Climate Action Plan 2019 To Tackle Climate Breakdown". The same terminology should be used in the Council's Adaption Strategy.
- There should be enhanced provisions for promotion of public transport, park and ride facilities and greater collaboration with Irish Rail to increase the service.



- As regards section 6.1.5, Climate Change Adaptation Progress Report, negative aspects/outcomes should be included along-side the inclusions that have recommended.
- The risk to the food supply and the possibility of food production locally should be recognised in the Adaption Strategy.
- Wicklow may become home to Climate Refugees and this should be reflected in the area of Climate Justice.

**Response to issues raised in submission:**

The draft Climate Adaptation Strategy put out for consultation was exactly as presented to the Council on the 29<sup>th</sup> of April. The Climate and Biodiversity Emergency was declared after the members voted to put the strategy out to consultation. We can now make amendments suggested through public consultation so will reference the emergency declared in the introduction.

The terminology used in a document produced after this strategy was produced is not the key point. The declaration of an emergency already states in clear terms that Wicklow County Council recognises the severity of the situation.

Public transport is a mitigation measure rather than adaptation but transport can be considered a cross cutting theme with adaption considered in Action 2.3 Integrate climate considerations into the design, planning and construction of all roads, footpaths, bridges, public realm and other construction projects. Make provision to incorporate green infrastructure as a mechanism for carbon offset. Action 6.8 Explore feasibility of augmenting public transport and cycle routes within the County, including park and rides is relevant to this submission facilitating access to public transport. Action 6.9 Engagement with citizens on sustainable travel initiatives and schemes aims to build on work undertaken in 2019 with a major commuter survey. Work is already happening to tease out issues raised in the survey and solutions. Better public transport options are likely to play a role as are remote days working closer to home or at home and creating more jobs locally that match the skill set of those commuting.

The outline in section 6.1.5, Climate Change Adaptation Progress Report should be amended as suggested to identify obstacles, barriers or unexpected outcomes in order to ensure better learning in the process.

Food and food security is an important cross cutting Climate action issue. The recently developed food strategy should be assessed to identify how it can assist in delivering Climate Action identifying which goals can help us deliver Climate Action. It is already proposed in response to previous submissions to include a new Action 6.13 Review Wicklow Food Strategy to review which goals and actions, including those developing local products and local markets or allotments can help to deliver on Climate Action.

Climate refugees are Climate Justice issue and one which may grow in significance in the coming years. It is however not a matter for Wicklow County Council to set policy. Policy on the matter is decided at EU level with input from the Irish government. Wicklow County Council will work with the relevant authorities where possible to ensure its services are accessible as needed by refugees placed in Wicklow by the authorities.

**Recommendation: Amend Section 6.1.5 on the progress report to incorporate capturing information on barriers, obstacle or unexpected outcomes.**

**Sub No. 72: Muriel Koyce**

**Summary of issues raised:**

- Increase frequency of railways between Wicklow and Dublin, with more carriages, as an alternative to commuting by car.
- Ban single use plastic in Wicklow County Council and locally.
- Install public drinking fountains
- Plant pollinators and other bee friendly plants, and more trees.
- Have more green areas in estates.
- Look at renewable energy sources for council housing and buildings.
- Give all Council housing a BER rating to ensure adequate insulation is in place.
- Ban on cutting of hedgerows.

**Response to issues raised in submission:**

The allocation of trains and carriages is a matter for Irish Rail and outside of the remit of Wicklow County Council.

Plastics is not a Climate Adaptation measure. It is outside of the remit of Wicklow County Council to ban single use plastics but the organisation is already taking steps to eliminate their use in our buildings. Plastics will be priority theme under Action 6.10 which addresses waste prevention, resource efficiency and the circular economy. Food is an important cross cutting Climate action issue.

Wicklow County Council is currently working on an EPA funded project to support the refill.ie campaign which includes installing water bottle filling fountains in secondary schools. It is covered under Action 6.10 An awareness campaign on the role of waste prevention, resource efficiency and the circular economy. Greystones municipal district installed three public fountains in Greystones in 2019 and it is hoped that more will be installed going forward.

Actions 5.1 and 5.4 look at enhancing tree planting and care. Planting for pollinators should be addressed through Action 5.5 the review of the Biodiversity Plan.

Land use planning will be guided by national policy with the aim to achieve higher densities of settlement being a key policy in order to increase the sustainability and car free connectivity of communities. The County Development Plan is the appropriate document for adjudicating on provision of green space.

Renewable energy sources for houses and buildings is a mitigation measure rather than adaptation. The National Climate Action Plan is setting ambitious targets for both the local authority buildings and

retrofitting of Council housing stock. The target for local authority housing is to upgrade to a BER rating of B2 by 2030. All council housing recently built and being built at present uses renewable heat sources.

This submission does not specifically deal with a climate adaptation issue although it is relevant to the associated issue of biodiversity decline. Hedge cutting as an issue should be addressed in the review of the Biodiversity Action Plan where the issue of implementing existing legislation on hedge cutting could be strengthened by putting in place measures to better monitor and control cutting done in season. This would ensure is only done when required for safety of road and footpath user and that reasons for cutting, when it does occur for safety, are documented.

**Recommendation: No further action required relevant issues have already been addressed.**

**Sub No. 73: Ann Scanlon**

**Summary of issues raised:**

- Complete a Wicklow Climate & Biodiversity Action Plan that is stronger and more data-driven than the draft strategy.
- Reference in the strategy the Wicklow Emergency dated 29<sup>th</sup> April 2019.
- Commit to zero carbon emissions by 2030.

**Response to issues raised in submission:**

Wicklow County Council has not undertaken to develop a Climate and Biodiversity Action plan. It has developed a Climate Adaptation Strategy as mandated by statute. The Strategy drew on the best available data from the EPA, Climate Ireland, Met Eireann, NUIM, and UCC, the support of a regional team in CARO and most importantly local experience and data sources in-house.

The draft Climate Adaptation Strategy put out for consultation was exactly as presented to the Council on the 29<sup>th</sup> of April. The Climate and Biodiversity Emergency was declared after the members voted to put the strategy out to consultation. We can now make amendments suggested through public consultation so will reference the emergency declared in the introduction.

The target for the public sector for 2030 is to reduce energy consumption by 50%. This is a very ambitious and difficult to achieve target but Wicklow County Council intends to achieve it. Net zero by 2030 would not be achievable in the timeframe without a clear pathway to do so and setting a target that is unlikely to be achieved with current available solutions would not be recommended. Wicklow will endeavour to achieve and where possible exceed targets set out in this strategy and the national Climate Action Plan.

**Recommendation: No further actions arising from this submission.**

**Sub No. 74: Alex Pigot**

**Summary of issues raised:**

- The Executive Summary should reflect climate change mitigation strategies which are forecast from other stakeholders, e.g. Dept. Of Agriculture, Irish Water, Iarnród Éireann, NRA, Dept of Environment.
- Not sufficient to set out current climate change impacts but rather needs a vision out to the way land (incl. map) will be used by 2030.
- Executive Summary should include some of the proactive measures being taken in pages 95-104.
- It should finish with a note about the make-up and role of the Climate Action Steering Group to whom the Chief Executive should report.
- The tables on pages 35-63 show the Existing Adaptive Response. They need to contain an additional column entitled Proposed Future Adaptive Response, and these should address all the Climate Hazards where the impact is higher than 6.

**Response to issues raised in submission:**

Twelve sectoral climate adaptation strategies are being developed in tandem with the strategies being developed by each local authority. It is envisaged that there will be some cross cutting issues relevant to more than one sector and between sectors and the local authorities. This will involve collaboration going forward. However it is appropriate that the Climate Adaptation produced by Wicklow County Council focuses on issues that relate to the operations of Wicklow County Council and communities in County Wicklow rather than try to address all issues that will arise in the county. The appropriate space to address shared interests with other sectors is through the identification of risks and actions that will be taken to counter them rather than in the executive summary.

Chapter 4 looks at existing vulnerabilities and impacts of weather events and using predicted changes in climate projects how risks will develop in the timeframe out to 2050. Land zoning out to 2030 will be guided by national guidelines and the County Development plan rather than this strategy would be the appropriate document for setting out a vision of land use planning.

Highlighting some of the key proactive actions by incorporating them into the executive summary is a very worthwhile exercise. We have already decided to extend to summary in response to submissions that the main document is difficult to read and this can help to inform people of how the strategy will address Climate Adaptation. It should also cover the role of the steering group and newly created SPC to ensure implementation of the plan.

This strategy identifies how risks are impacting on services and communities. It is not intended that the response going forward will be the same but rather that through the implementation of actions in this strategy each section will then be able to assess and decide on the appropriate response or mitigation measures going forward. In most cases that assessment is part of the implementation of the strategy to ensure that going forward we can cope with change.

**Recommendation:** In extending the executive summary to create a more comprehensive easy to read synopsis of the strategy it would be worthwhile to profile some key actions and areas for action and details of how it will be guided through implementation.

**Sub No.75, 76 : Irish Business for Climate Action, KRA Visionary Project Partners**

**Summary of issues raised:**

- Strategy should focus more on climate change mitigation and also trend reversal as opposed to the focus being on damage mitigation.
- Strategy should be reviewed by CARO every 2-3 years instead of the proposed 5 years.
- Rewilding should be encouraged, mass planting of deciduous forests, allow for natural corridors to allow wildlife free movement such as a greenway from Kilcoole beach to Glendalough.
- Financial instruments should be developed to allow individual and groups to develop self-financing and self-sustaining large scale renewable energy projects. This may lead to these “prosumers” expanding efforts into other kinds of sustainability.
- Not to mention farmers and their role in chapters 5 & 6 is a gross oversight as their activities cause large emissions of greenhouse gases. Farmers should be incentivised to look into their underutilised potential for green energy production, decrease herd sizes and move from meat production to market gardening, move to rewilding and more organic practices.
- Community gardens should be set up with underused public land appropriated for this purpose.
- Investigate increased potential of pumped hydro storage of electricity in Wicklow Mountains to do away with the need for fossil fuels as “back-up”.
- A framework should be developed to internalise future costs of climate change to be used when making climate decisions.
- The restrictions, planning terms, on the installation of renewable energy production infrastructure, e.g. rooftop solar, small/medium wind turbines, should be lifted and classed as exempted development. Planning constraints governing micro-generators of renewable energy for communities should be lifted.
- Wicklow County Council should impose an immediate ban on bituminous “smoky” coal.
- WCC to become peat-free especially in landscaping activities and encourage community on this also.
- WCC should spearhead a campaign to ban single use plastics.
- WCC should not cut grass, verges, hedges or trees except in cases of serious threat to public safety and also allow disused sites to naturally rewild.
- County’s wetlands, particularly between Kilcoole and Wicklow Town, needs full, absolute and permanent protection.

- Consideration to be given to designating significant areas of coastline as a marine protection zone.
- WCC to facilitate an advertising campaign to highlight climate change as a real threat the requires urgent action. WCC should also support local climate awareness and action events.
- Reintroduce in parks, playgrounds and beaches public bins segregated into recycling, compost and general waste.
- Agrees that a Climate Action Officer should be appointed.
- With regards to point 1.14 EV charging points should be installed in all WCC sites/car parks etc.
- Point 1.19, engagement by WCC with EMWRO on the review of the regional waste plan, has not been budgeted and requires to be budgeted.
- Point 2.1, identifying and protecting WCC buildings and associated services against key vulnerabilities”, could be widened to retrofit buildings to reduce greenhouse gas emissions.
- Point 3.3, urban greening, should be promoted as widely as possible to include homeowners, tenants, businesses, hospitals, nursing homes and schools.
- Point 5.2, tree planting, should be implemented immediately but requires to be budgeted.
- Point 5.3, best practice on biodiversity planting, education and training is essential here.
- There should be stronger enforcement and sanctions for cases of illegal hedge-cutting and tree-felling.
- Point 5.6, mapping areas beneficial for use as local carbon offset, should be implemented immediately and budgeted.
- Agrees with point 5.9, appoint consultants to assess impact of climate change.
- Point 6.1, raising awareness through the PPN, focus should be on how individuals can prevent breakdown as opposed to increasing response and resilience.
- Point 6.5, grants to communities, requires to be budgeted, possibly with help of SEAI.
- Point 6.8, augmenting public transport, budgeting this is essential.
- Point 6.9, engagement with public on sustainable travel, this needs to be explored in greater detail.
- Point 6.10, awareness campaign on the role of waste prevention, this could be done in collaboration with other groups; SEAI, PPN, schools etc. and introducing circularity in construction is vital.

#### **Response to issues raised in submission:**

A review of the strategy is required every five years but the expectations by both Wicklow County Council and CARO is that there will be a lot of learning as we move into implementation and also engage with other actors and that we will need to take a flexible approach open to developing our strategy in the coming years.

Rewilding would best be addressed through the Biodiversity plan, Action 5.5. There are two actions 5.1 and 5.4 to cover tree planting and tree care.

Developing a greenway from Kilcoole to Glendalough is beyond the scope of this adaptation strategy.

Wicklow County Council is supportive of renewable energies and has facilitated through the planning process the development of renewables where feasible and mindful at the same time of protecting key uplands areas and the views of local communities and their elected representatives. We share the vision of Wicklow being a county that can meet all of its energy needs and more through renewable going forward. SEAI is the government agency which is mandated to offer financial support for the development of this sector. The government and ESB networks are working to resolve grid access issues but again it outside the mandate of Wicklow County Council.

Wicklow County Council is not the appropriate organisation to address issues with farming practice.

Wicklow County Council has long supported the community gardening movement through advice and grants where there is community interest to sustain the activity.

ESB networks would be the appropriate body to address the issue of hydro storage.

The Climate Action Plan commits local authorities to delivering a green procurement approach which incorporates carbon pricing and climate criteria. While largely a mitigation measure it worth looking at Green procurement as an overarching measure and including it as a new action. Action 1.22 Develop a Green Procurement strategy for the organisation which will stipulate where specific conditions are to be assessed prior to procurement.

Planning of renewable energy infrastructure is covered by national guidelines which are generally very proactive in favouring development. Wicklow County Council is very supportive of householders and communities installing renewable but must consider the view of all citizens and planning guidelines

Wicklow County Council has facilitated the creation of smokeless coal zones in all major towns through national legislation. A total ban would be beyond the remit of Wicklow County Council and we will be guided by national legislation. Recent local authority houses built have not had a fireplace but use renewable air to heat pumps.

Wicklow County Council does not do significant levels of landscaping that would require a ban on peat products. The above mentioned green procurement approach would be a better mechanism to avoid use of peat products.

Plastics is not a Climate Adaptation measure. It is outside of the remit of Wicklow County Council to ban single use plastics but the organisation is already taking steps to eliminate their use in our buildings. Plastics will be priority theme under Action 6.10 which addresses waste prevention, resource efficiency and the circular economy. Food is an important cross cutting Climate action issue.

Wicklow County Council is currently working on an EPA funded project to support the refill.ie campaign which includes installing water bottle filling fountains in secondary schools. It is covered under Action 6.10 An awareness campaign on the role of waste prevention, resource efficiency and the circular economy. Greystones municipal district installed three public fountains in Greystones in 2019 and it is hoped that more will be installed going forward.

The management of verges, hedges etc should be addressed through the Biodiversity Plan, Action 5,5. It is not an adaptation measure.

The wetlands between Kilcoole and Wicklow are already a protected site, listed as a SAC. The strategy includes an action. 3.6 Undertake the identification, recording and mapping of wetlands and other locally important biodiversity areas and use this information to inform land use decisions.

Declaring a Marine Protection Area is outside of the remit of Wicklow County Council and should be addressed by the DAFM and the NPWS.

An advertising campaign undertaken at national level on Climate Change would be more appropriate than Wicklow County Council and every other local authority attempting to do so at local level. Theme 6 COMMUNITY HEALTH AND WELLBEING with the Objective: To build capacity and resilience within communities aims to assist people at community level to raise awareness and take actions that will reduce emissions. It includes input from Community and Economic Development, the Environmental Awareness Office and the Public Participation Network.

Provision of bin and associated recycling bins is not a climate adaptation measure.

Wicklow County Council will continue to work with SEAI and ESB networks to enable provision of EV charging points throughout the whole county, particularly in public car parks. This action is more a mitigation measure and is adequately covered in the Climate Action Plan.

The budget for the Waste management regional office and the delivery of the plan is agreed through their office with Wicklow County Council paying its share in proportion to population. It is budgeted and the plan should be amended.

The retrofitting of WCC buildings is a mitigation measure so not considered here but works are happening and planned in order to meet targets set in the national Climate Action Plan for all public sector buildings.

Wicklow County Council can guide the development of green infrastructure in new developments but existing building and their management is outside of our remit.

A strategy to promote tree planting will have to be budgeted once the most effective way to deliver tree planting is decided, identifying where to plant, who will plant and how much it will cost.

Good practice models on biodiversity planting such as the pollinator plan already exist.

Wicklow County Council does not play a role in the enforcement of legislation on hedge cutting.

Items not budgeted can only be looked at when the annual budget is decided later in the year.

Wicklow County Council is working with the PPN to raise awareness on both adaptation and mitigation measure but as this is an adaptation strategy it alone was addressed in Action 6.1

Grants that Wicklow County Council distribute to local communities are budgeted annually. SEAI is a separate organisation and operates its own budget and grant procedures.

Wicklow County Council can work with partners in Bus Eireann and Irish Rail to explore the feasibility of augmenting public transport but cannot finance such augmentation in service itself directly.



No limit has been placed on the engagement with the public on sustainable transport but the availability of human resources will be the key limiting factor.

The Environmental Awareness Office already works with a wide range of partners in the delivery of its waste prevention activities which includes schools, tidy towns groups, youth groups, the EPA, the Clean Technology Centre in Cork, the Eastern Midland Waste Management Regional Office, The Rediscovery Centre which is now the designated National Centre for the Circular Economy as well as working in partnership with neighbouring local authorities on individual projects. SEAI does not have any role in waste prevention.

**Recommendation: Action 1.19 is budgeted and should be amended accordingly.**

**Sub No. 77: Rosemary Warner**

**Summary of issues raised:**

- The Council should be involved not only in adaptation but also mitigation and also preventing climate change.
- Staff Training is essential to Climate change and needs to be introduced into the Strategy.
- The Climate Action Steering Group is inadequate in terms of frequency of meeting and seniority. The Council's CEO and senior management team should be responsible for implementing climate action and should co-ordinate same with other government departments and agencies.
- Timeframes for actions should be specific and not vaguely termed long/medium/short-term.

**Response to issues raised in submission:**

Wicklow County has produced a Climate Adaptation Strategy as required by statute. It did not set out to address mitigation measures in this strategy. It is clear that there is strong support throughout the county for Wicklow County Council to also address mitigation that will help attain a low carbon transition within its remit and assist where feasible others to achieve that goal. Wicklow County Council is already working with Sustainable Energy Communities in County Wicklow and will continue to support these communities and encourage others to engage in the programme. Mitigation measures are already a part of many work programmes and the Climate Action plan published by the government assigns further actions to local government and also will shift focus in many policy and economic development areas towards mitigation. Wicklow County Council will soon have to develop further actions in this area. It is important that the adaptation strategy recognizes the purpose of the Climate Action Plan and the role intended for Local Authorities to meet targets and contribute to the national climate ambition. Wicklow County Council will include an action to reflect this. *Action 1.20* Assess the range of and scope of existing mitigation measures already undertaken by Wicklow County Council and those that will be required under the Climate Action Plan.

We have recognised from a previous submission that there is a case for developing a specific action for a programme of awareness and training for elected representatives, staff and communities on the role we play and how it will be achieved in addressing Climate Action. A new action to develop training should be added to Theme 1, Action XX: Develop and deliver training and awareness campaigns for staff, elected representatives and communities on Climate Action.

The Climate Action steering group will be led by a Director of Services who will report back directly to the Chief Executive and management team. The new Climate and Biodiversity SPC will also be represented. The frequency of meeting has yet to be decided.

Timelines and funding have been projected based on available information and priority. Theme 1, Action 5 does require the development of service indicators for adaptation measures. Budgeting, resources, and timeframes for review of other policies and plans will play a key role in shaping delivery. It would not be appropriate to prejudge decision that have yet particularly at local but also at national level on funding that will be allocated. Key factors will include the recruitment of a Climate Action Officer, the establishment of both the steering group and the SPC. It should then be feasible for the development of a precise timescale with indicators by early 2020 allowing for full consultation with relevant services, budgeting and allocation of resources. Wicklow County Council will put in text clarifying time frames in terms of what short, medium and long mean.

**Recommendation: No further action required.**

**Sub No. 78:     Antoinette Whelan**

**Summary of issues raised:**

- Opening section should reiterate the WCC declaration of Climate Change and Biodiversity Emergency (29<sup>th</sup> April 2019) in it the Strategy's opening section and state WCC is committed to standing by this declaration.
- More details required on reducing carbon emissions in-line with zero carbon by 2030.
- Explicit commitment to banning glyphosphates (e.g. Roundup) and requesting tidy towns and community groups to do so also.
- Regarding theme 3, page 100, clear policies are required on new developments using renewable fuels, and more details on how to achieve point 3.2, climate smart building and urban design, and point 3.3, green infrastructure.
- More support required to support communities wishing to generate their own power.
- WCC should be a role model in mitigation, with actions such as meat-free Mondays, Green Buildings, Electric Vehicles and Environmental Whistleblower Hotline, and use network of contacts to get partners to act likewise.
- Include measurements, bans, boycotts and actions requested by Wicklow Community for Climate and Biodiversity Action.

- Convene a local Wicklow Citizens' Assembly to engage particularly with the 3<sup>rd</sup> level education & research sector including Carlow IT and KWETB.
- Point 6.10 community recycling needs to be addressed.
- Points 6.8 and 6.9, Transport needs to be addressed more urgently and more busses from rural villages and towns to Dublin.
- Requirement for WCC to sign up to the Covenant of Mayors for Climate & Energy and state this in the opening section.

**Response to issues raised in submission:**

The draft Climate Adaptation Strategy put out for consultation was exactly as presented to the Council on the 29<sup>th</sup> of April. The Climate and Biodiversity Emergency was declared after the members voted to put the strategy out to consultation. We can now make amendments suggested through public consultation so will reference the emergency declared in the introduction.

The target for the public sector for 2030 is to reduce energy consumption by 50%. This is a very ambitious and difficult to achieve target but Wicklow County Council intends to achieve it. Net zero by 2030 would not be achievable in the timeframe without a clear pathway to do so and setting a target that is unlikely to be achieved with current available solutions would not be recommended. Wicklow will endeavour to achieve and where possible exceed targets set out in this strategy and the national Climate Action Plan. This strategy focuses on adaptation rather than mitigation measures.

Banning the spraying of weeds and Roundup is not a Climate Adaptation measure but it is something that could be looked at by the Climate and Biodiversity SPC as part of the response to the Climate and Biodiversity emergency.

It is beyond the scope of this document to set out policies on new developments and urban design. The National Climate Action Plan was published after this draft strategy. It sets out many of the policy goals going forward and the Wicklow County Council Climate Adaptation Strategy will be updated to reference this plan which set policy for Climate Action going forward.

Wicklow County has produced a Climate Adaptation Strategy as required by statute. It did not set out to address mitigation measures in this strategy. It is clear that there is strong support throughout the county for Wicklow County Council to also address mitigation that will help attain a low carbon transition within its remit and assist where feasible others to achieve that goal. Wicklow County Council is already working with Sustainable Energy Communities in County Wicklow and will continue to support these communities and encourage others to engage in the programme. Mitigation measures are already a part of many work programmes and the Climate Action plan published by the government assigns further actions to local government and also will shift focus in many policy and economic development areas towards mitigation. Wicklow County Council will soon have to develop further actions in this area. It is important that the adaptation strategy recognizes the purpose of the Climate Action Plan and the role intended for Local Authorities to meet targets and contribute to the national climate ambition. Wicklow County Council will include an action to reflect this. *Action 1.20* Assess the range of and scope of existing mitigation measures already undertaken by Wicklow County Council and those that will be required under the Climate Action Plan.

Measurements, bans, boycotts and actions requested by Wicklow Community for Climate and Biodiversity Action have already been addressed in previous submissions.

The Citizen Assembly at national level played an important role in getting citizens views documented with a view to shaping policy at national level, helping to bridge the gap between citizens and policy makers. In Wicklow we already have structures in place to encourage a better role for citizens in making an input to policy. The elected representatives serve as a conduit from their local communities. The Public Participation Network allows citizens and groups to convene meetings that facilitate engagement by all members of the public. The interaction between people in the PPN, elected representatives and staff of Wicklow County Council already has the capacity to deliver the public engagement needed going forward. Wicklow County Council has built a strong working relationship with the schools of County Wicklow and will continue to work with schools to address Climate Action with the younger generation. It is already proposed in response to a previous submission that an action on Green Schools be added to the strategy to reflect this work. Wicklow County Council is not the lead on development of new training and education courses supplied by both Carlow Institute of Technology and the KWETB but will work in partnership with both organisations to facilitate new training opportunities.

Recycling is covered by the circular economy which looks at all measures that can be used to keep resources in circulation. Waste prevention, minimisation, and reuse are preferred options for keeping materials in circulation.

Buses are a mitigation measure rather than adaptation but transport can be considered a cross cutting theme with adaption considered in Action 2.3 Integrate climate considerations into the design, planning and construction of all roads, footpaths, bridges, public realm and other construction projects. Make provision to incorporate green infrastructure as a mechanism for carbon offset. Action 6.8 Explore feasibility of augmenting public transport and cycle routes within the County, including park and rides is relevant to this submission facilitating access to public transport. Action 6.9 Engagement with citizens on sustainable travel initiatives and schemes aims to build on work undertaken in 2019 with a major commuter survey. Work is already happening to tease out issues raised in the survey and solutions. Better public transport options are likely to play a role as are remote days working closer to home or at home and creating more jobs locally that match the skill set of those commuting. Wicklow County Council is working to facilitate the development of rural bus services. The new local link service from Glendalough to Wicklow launched in April 2019 aims to connect the communities of Laragh, Annamoe, Roundwood Ashford, Rathnew and Wicklow.

The SPC on Climate Change and Biodiversity could bring forward the proposal to become a signatory to the EU Covenant of Mayors for Climate and Energy to the elected members of Wicklow County Council. It should be noted that Wicklow County Council is already undertaking the actions required but that it will entail additional bi-annual reporting on progress.

**Recommendation: All issues previously raised so no further action required.**

**Sub No.79: Mary-Anne Parsons**

**Summary of issues raised:**

- The draft Strategy omits the following risks: heatwave/drought, strong wind/storms, snow & ice, high sea levels & coastal flooding, heavy rainfall.
- Risk factors should reflect off shore risks to marine life and impacts on ocean not just interface between land and sea
- Draft Strategy should be more far reaching and mitigation should form part of it.
- Mechanism required to ensure co-ordination between Wicklow County Council and “other Relevant Actors”.
- Publically available annual review of strategy required
- County Manager should be responsible for the Strategy

**Response to issues raised in submission:**

All of the following risks: heatwave/drought, strong wind/storms, snow & ice, high sea levels & coastal flooding, heavy rainfall are discussed with observed impacts used to assess vulnerabilities’ with a view to identifying areas for action.

Wicklow County Council is not the appropriate body to address risks to marine life and impacts on the oceans. This issue should be addressed to the DAFM or the NPWS.

Wicklow County has produced a Climate Adaptation Strategy as required by statute. It did not set out to address mitigation measures in this strategy. It is clear that there is strong support throughout the county for Wicklow County Council to also address mitigation that will help attain a low carbon transition within its remit and assist where feasible others to achieve that goal. Wicklow County Council is already working with Sustainable Energy Communities in County Wicklow and will continue to support these communities and encourage others to engage in the programme. Mitigation measures are already a part of many work programmes and the Climate Action plan published by the government assigns further actions to local government and also will shift focus in many policy and economic development areas towards mitigation. Wicklow County Council will soon have to develop further actions in this area. It is important that the adaptation strategy recognizes the purpose of the Climate Action Plan and the role intended for Local Authorities to meet targets and contribute to the national climate ambition. Wicklow County Council will include an action to reflect this. *Action 1.20* Assess the range of and scope of existing mitigation measures already undertaken by Wicklow County Council and those that will be required under the Climate Action Plan.

Wicklow County Council agrees that there needs to be mechanisms to ensure a coordinated approach. Wicklow is working as part of a region of 17 local authorities with CARO. There has been sharing of information between local authorities to develop a more coordinated approach and share best practice.

There are also twelve sectoral strategies being developed for key sectors at national level and both our strategy and the sectoral strategies identify areas of common interest where actions may involve cross cutting measures between more than one party. On issue previously raised is that the farming community, Coillte, the NPWS and landowners will be key partners in delivering adaptation and mitigation measures, and that we will need to engage and work more closely with this sector in order to strengthen our capacity to protect resources for all in County Wicklow. An action to facilitate this should be incorporated to the plan under Theme 6 Community Health and Well Being. Action 6. 11: Develop a steering group to explore and develop common goals and objectives between Wicklow County Council and representatives from the farming, forestry, Parks and Wildlife Service and landowners sectors in rural and upland areas of the county.

Reporting on progress i.e. a Climate Change Adaptation Progress Report will be prepared annually, (based on the initial date of the adoption of the strategy), for input by the Management Team and SPC and review by the Elected Members. The progress report should provide for, inter alia:

- Progress achieved on actions to that point (including key indicators as established)
- Extent to which actions have achieved and built new relationships with key stakeholders, agencies, communities and identified new or emerging opportunities.
- Identification of funding streams used
- Inspired or encouraged positive community engagement
- Reports on the outcomes of efforts to change behaviour

The Chief Executive of Wicklow County Council is responsible for ensuring that this strategy is implemented.

**Recommendation: Issues addressed previously. No further action required.**

**Sub No.80: Fiona O'Farrell**

**Summary of issues raised:**

- Requests further information on how the effects of pesticides (including glyphosate) and electromagnetic field pollution which affect wildlife and plant biodiversity are being addressed in the Strategy.

**Response to issues raised in submission:**

These two issues are not related to each other and neither can be considered directly relevant to the implementation of a climate adaptation strategy.

**Recommendation: Issues not relevant to the strategy.**

**Sub No.81: Donna Scanlon**

**Summary of issues raised:**

- Take major action to live up to Wicklow County Council climate and biodiversity emergency and continue to be a Green Leader.
- Make Wicklow County Council buildings green.
- Plant more trees on all County Council land.
- Scatter Irish wildflower seeds along all roads
- Outlaw balloon releases.

**Response to issues raised in submission:**

Wicklow County Council agrees that major action is required across all services and operations of the organisation to address the climate and biodiversity emergency. This strategy sets out the measures that will be used to address Climate Change Adaptation.

Wicklow County Council is committed to achieving its target, and surpassing it where feasible, under the national Climate Action Plan of a 50% reduction in carbon emissions from its building stock. In 2019 *work on 40 projects has commenced across 11 WCC buildings.*

Action 5.1 Develop a strategy to undertake and implement an active Tree Planting programme in the context of climate adaptation in conjunction with an awareness campaign that informs of the benefits to communities in improving air quality, offsetting carbon emissions, promoting biodiversity, limiting flood risk, reducing urban heat, as well as aesthetic value aims to increase the number of trees planted not just on council lands but throughout the county.

Promoting planting for biodiversity is a very worthwhile target. What measures can and should be taken is best addressed through the Biodiversity plan. Maintaining existing biodiversity and local seed diversity should be the first priority rather than introducing seed from elsewhere in Ireland.

Wicklow County Council has already committed to phasing out the use of single use plastics in its own activities. It is beyond the remit of Wicklow County Council to ban these materials in public. We do share concerns that such items contribute both to the unnecessary generation of waste and litter and will endeavour to focus awareness campaigns on their elimination or replacement as appropriate. Action 6.10 on awareness of the role of waste prevention, resource efficiency and the circular economy addresses this issue. Where public events and festivals are organised we require a waste management plan be implemented and would hold any organiser liable for the collection of waste balloons, using existing litter legislation.

**Recommendation: The issues raised have been addressed previously or are covered by existing measures.**

**Sub No.82: Alice O'Donnell**

**Summary of issues raised:**

- Document should be called “Climate Change Mitigation and Adaptation Strategy” with emphasis on avoiding, instead of adapting to, climate change.
- Gathering and analysing data is key in drafting a strategy.
- Timelines should be specific for objectives rather than using vague terms such as long/medium short-term.
- Medium and long-term goals need also to be included (alongside short-term goals) and they need to be broken down into objectives/actions to measure progress.
- Review should be annual not every 5 years.
- Chief Executive should have overall responsibility and chair Climate Action Steering Group with senior officials from each section of the Council sitting in the group. Meetings should be monthly and should report to the Climate Action and Biodiversity SPC.
- Monthly Chief Executive’s report should include update on the Strategy.
- Implement a carbon contribution to offset carbon footprint of new developments.
- Encourage developments with communal gardens e.g. through co-operative housing model.
- Part of new developments’ open space should be given over to “wild space” promoting biodiversity.
- Provide public drink water on walking routes.
- New developments should provide bat/swift nesting boxes, EV charging points, native tree planting
- Provide play areas in all towns and villages to discourage travelling by car to play areas in other places.
- Planning process requires independent verification of statistics related to distances quoted in applications
- Promote development within walking distance of public transport
- Database of undeveloped town centre sites should be created.
- At review of County Development Plan sites may be dezoned if contrary to principles of good planning.
- Any local issues that have national relevance should have a mechanism for advancing them. e.g. through CARO.
- Wicklow County Council needs to be creative in developing the IDA site in Greystones and attracting business.
- The potential conflicts between provision of certain types of housing/employment (e.g. data centres with huge users of electricity) versus the impact these developments have on the environment needs to be identified and agreed to avoid geographical/political bias.
- In developing the Strategy, there should be focus groups with young people (through Comhairle na nOg).
- Schemes such as Heritage in Schools, Safer Routes to School and Green Schools schemes should be promoted as well as an award scheme to incentivise good ideas in our schools.
- Covered bike stands should be provided at all schools.
- The Strategy needs to be considered in relation to neighbouring counties’ strategies, and national and international strategies, e.g. considering issues such as Mercosur agreement.
- The impact of increasing population in Wicklow should be taken into consideration.



- The carbon footprint of all major projects should be assessed.
- All councillors and relevant council staff should receive climate change training.
- Welcome the proposed use of PPN.
- Provide grants for community gardens.
- Facilitate a social enterprise where owners of large gardens who are unable to garden themselves host a young family.
- Promote sustainable food supply.
- Promote phasing out the use of glysohates.
- Promote enhanced rail services, better park and ride facilities, N11 widening for use reserved for public transport and car sharing, the Bus Connects proposals.

**Response to issues raised in submission:**

Wicklow County has produced a Climate Adaptation Strategy as required by statute. It did not set out to address mitigation measures in this strategy. It is clear that there is strong support throughout the county for Wicklow County Council to also address mitigation that will help attain a low carbon transition within its remit and assist where feasible others to achieve that goal. Wicklow County Council is already working with Sustainable Energy Communities in County Wicklow and will continue to support these communities and encourage others to engage in the programme. Mitigation measures are already a part of many work programmes and the Climate Action plan published by the government assigns further actions to local government and also will shift focus in many policy and economic development areas towards mitigation. Wicklow County Council will soon have to develop further actions in this area. It is important that the adaptation strategy recognizes the purpose of the Climate Action Plan and the role intended for Local Authorities to meet targets and contribute to the national climate ambition. Wicklow County Council will include an action to reflect this. *Action 1.20* Assess the range of and scope of existing mitigation measures already undertaken by Wicklow County Council and those that will be required under the Climate Action Plan.

The Strategy drew on the best available data from the EPA, Climate Ireland, Met Eireann, NUIM, and UCC, the support of a regional team in CARO and most importantly local experience and data sources in-house.

Timelines have been projected based on available information and priority. Theme 1, Action 5 does require the development of service indicators for adaptation measures. Budgeting, resources, and timeframes for review of other policies and plans will play a key role in shaping delivery. It would not be appropriate to prejudge decision that have yet particularly at local but also at national level on funding that will be allocated. Key factors will include the recruitment of a Climate Action Officer, the establishment of both the steering group and the SPC. It should then be feasible for the development of a precise timescale with indicators by early 2020 allowing for full consultation with relevant services, budgeting and allocation of resources. Wicklow County Council will put in text clarifying time frames in terms of what short, medium and long mean.

As this is a first iteration of a Climate Adaptation Strategy much of the focus is on embedding a focus on Climate Change into all services, operations and the governance of the organisation. Setting more

detailed medium to long term goals would be difficult at his point. It is intended that a clearer understanding developed through this strategy will facilitate more concrete identification of medium to long term actions.

Reporting on progress i.e. a Climate Change Adaptation Progress Report will be prepared annually, (based on the initial date of the adoption of the strategy), for input by the Management Team and SPC and review by the Elected Members. The progress report should provide for, inter alia:

- Progress achieved on actions to that point (including key indicators as established)
- Extent to which actions have achieved and built new relationships with key stakeholders, agencies, communities and identified new or emerging opportunities.
- Identification of funding streams used
- Inspired or encouraged positive community engagement
- Reports on the outcomes of efforts to change behaviour

An annual review of the plan is not planned but we recognise that policy is developing rapidly and that a flexible approach is needed. This has been discussed with CARO and it is envisaged that local authorities will adapt to changing circumstances as needed.

The Chief Executive of Wicklow County Council is responsible for ensuring that this strategy is implemented. It is within his power to designate another senior officer to lead the steering group. Frequency of meeting will be decided by the steering group. It is envisaged that the Climate and Biodiversity SPC will be represented on the steering group which will then report back to the SPC.

The monthly Chief Executive's report has contained a section on the Climate Adaptation Strategy over recent months. We agree that this should continue and is worth adding as an action in the strategy to ensure it continues going forward. *Add Action 1.24 Provide an update on progress in the Climate Adaptation Strategy and on Climate Mitigation measures in the Chief Executive's monthly report.*

Wicklow County Council believes that the focus for new developments needs to be on attaining the highest standards in carbon efficiency rather than carbon offsetting as this has more impact over the lifecycle of the building. The cost of building has increased significantly in recent years in order to achieve A rated energy ratings. While this is appropriate it would not be fair to load more cost in terms of offsetting on to the cost of a new building.

With a focus achieving higher densities of settlement increasingly housing units have less personal open space with a greater focus on communal space being provided. Residents through their residents association or Management Company can influence or make decisions on how this land is used. Wicklow County Council promotes better engagement by residents in the management of their estates and local area. Whether the space is used for communal gardening, rewilding or otherwise needs to be made at local level rather than imposed from above.

Wicklow County Council is currently working on an EPA funded project to support the refill.ie campaign which includes installing water bottle filling fountains in secondary schools. Greystones was the first town in Ireland to roll out a network of public drinking fountains and it is hoped that more can be

installed. It is covered under Action 6.10 An awareness campaign on the role of waste prevention, resource efficiency and the circular economy. We would certainly be open to putting them in on any walking or cycling routes where appropriate.

Bat boxes and swift boxes should be addressed through the review of the Biodiversity Pan Action 5.5. Measure to encourage them rather than mandates are likely to be more effective.

Wicklow County Council agrees that new development will require EV charging point now or in the very near future, and expect that it will sound become a building standard . The provision of charging points for parking spaces should be considered through the County Development Plan guided by national planning guidelines and the Climate Action Plan. While targets are being set for the number of charging points to meet growing demand there is also a case to be made for all parking spaces to be cabled to facilitate future installation while also ensuring adequate charging points are installed to meet short term demand.

Tree planting is covered in Action 5.1 Develop a strategy to undertake and implement an active Tree Planting programme in the context of climate adaptation in conjunction with an awareness campaign that informs of the benefits to communities in improving air quality, offsetting carbon emissions, promoting biodiversity, limiting flood risk, reducing urban heat, as well aesthetic value aims to increase the number of trees planted not just on council lands but throughout the county.

Wicklow County Council has been actively working with communities on the development of playgrounds and will continue to do so.

Planners consider applications on their merit and any discrepancies in distances quoted are measured.

Transport is already considered in the planning system both within the County Development and also under the regional planning guidelines. It favours compact development in key towns to facilitate ease of local commuting.

Wicklow County Council maintains a list of derelict sites and promotes redevelopment or reuse for strategic town centre properties.

The rezoning of unsuitable sites is a reserved function and should be considered under the County Development Plan rather than through this strategy.

The partnership with CARO on Climate Adaptation has been instrumental in bringing information and training to local authorities from national bodies and experts but has also facilitated opportunities for local authorities to bring issues from local level up during meeting in order to share them with national bodies and experts. Four CARO offices were established each of which will develop a separate core area for research based on regional issues and learning from what is happening or being done at local level.

The development of the Greystones and other IDA sites falls outside of the remit of this strategy.

Regulating access to the grid is a matter for ESB networks. The planning system must already take account of supply and demand when assessing planning applications.

While it is no longer feasible at this stage to run focus groups with the youth membership of Comhairle na nOg, we recognise the role young people played in protests that led up to the declaration of a Climate and Biodiversity Emergency. Representation by Comhairle na nOg on the newly established Climate and Biodiversity SPC has been agreed and we hope to work closely with them going forward.

Wicklow County Council has been active in working with Schools through Green Schools for twenty years and will continue to do so. An Taisce are developing a new Climate Action programme within Green Schools building on their Climate Ambassador programme. Wicklow County Council will support the roll out of this programme. The Environmental Awareness Office undertakes activities, workshops, seminars and competitions tailored to help schools explore the environment as part of the curriculum and will continue to develop unique projects to assist schools address awareness on Climate Change. An action will be added to Theme 6 on education in schools, 6. XX Support the delivery of Climate Action Awareness and education in County Wicklow schools through Green Schools and associated Environmental Awareness initiatives. The submission touches on something important in reference to awards, Wicklow County Council has an annual awards scheme for Tidy Towns and Environmental awards. The awards have been open to other groups and schools for a number of year. We can expand the awards further to identify best practice, share best practice and give recognition. A new action will be added. *Action 6.15 Expand the reach of Wicklow County Council's annual Tidy Towns and Environmental awards to engage a greater range of groups, give greater recognition to work done by schools and recognize a greater range of environmental activities that help to address Climate Change.*

The equipping of schools with covered bike stands is not a matter for Wicklow County Council. An Taisce with funding from the DTA have funded their provision to school participating in the Green Schools travel theme.

Partnership with seventeen local authorities and CARO is facilitating the sharing of information between local authorities and also will facilitate sharing of strategic actions with national bodies through the twelve sectoral strategies produced by government bodies. There is a national framework which has been develop to implement Climate Adaptation called the Nation Climate Adaptation Framework.

Consideration of census data and expected population growth is always considered in all relevant plans and policies.

The Climate Action Plan commits local authorities to delivering a green procurement approach which incorporates carbon pricing and climate criteria. While largely a mitigation measure it worth looking at Green procurement as an overarching measure and including it as a new action. *Action 1.22 Develop a Green Procurement strategy for the organisation which will stipulate where specific conditions are to be assessed prior to procurement. This is a better approach as it allows a lifecycle approach to be incorporated into major projects*

Action 1.7 incorporates the running of awareness campaigns on Climate Change in its programme but we recognise from this and previous submissions that there is a case for developing a specific action for a programme of awareness and training for elected representatives, staff and communities on the role we play and how it will be achieved in addressing Climate Action. A new action to develop training will be added to Theme 1. Action 1.21: *Develop and deliver training and awareness campaigns for staff, elected representatives and communities on Climate Action.*

Grants for community gardens are covered in Action 6.5 Ensure that grants to communities fund climate resilient projects.

Wicklow County Council does not see a role for the organisation in facilitating a social enterprise where owners of large gardens who are unable to garden themselves host a young family.

The food strategy recently published by Wicklow County Council aims to assist the development of local produce. Food is an important cross cutting Climate action issue. The food strategy should be assessed to identify how it can assist in delivering Climate Action identifying which goals can help us deliver Climate Action. A new Action will be added in response to a previous submission Action 6.13 Review Wicklow Food Strategy to review which goals and actions, including those developing local products and local markets can help to deliver on Climate Action.

Banning the spraying of weeds and Roundup is not a Climate Adaptation measure but it is something that could be looked at by the Climate and Biodiversity SPC as part of the response to the Climate and Biodiversity emergency.

Transport can be considered a cross cutting theme with adaption considered in Action 2.3 Integrate climate considerations into the design, planning and construction of all roads, footpaths, bridges, public realm and other construction projects. Make provision to incorporate green infrastructure as a mechanism for carbon offset. Action 6.8 Explore feasibility of augmenting public transport and cycle routes within the County, including park and rides is relevant to this submission facilitating access to public transport. Action 6.9 Engagement with citizens on sustainable travel initiatives and schemes aims to build on work undertaken in 2019 with a major commuter survey. Work is already happening to tease out issues raised in the survey and solutions. Better public transport options are likely to play a role as are remote days working closer to home or at home and creating more jobs locally that match the skill set of those commuting. Wicklow County Council is working to facilitate the development of rural bus services.

**Recommendation:**

***Add Action 1.24 Provide an update on progress in the Climate Adaptation Strategy and on Climate Mitigation measures in the Chief Executive's monthly report.***

***Add Action 6.15 Expand the reach of Wicklow County Council's annual Tidy Towns and Environmental awards to engage a greater range of groups, give greater recognition to work done by schools and recognize a greater range of environmental activities that help to address Climate Change.***

**Sub No.83: Adele Meenan**

**Summary of issues raised:**

- Ban tree felling (except under certain circumstances).
- Allow grass verges and wildflowers to grow during the pollinator feeding season.
- Ban hedge cutting during nesting season.
- Ban herbicides and pesticides containing glysohates.
- Ban single use plastics in Council/Council funded offices

**Response to issues raised in submission:**

Wicklow County Council agrees that protecting and enhancing tree cover will be an important cross cutting climate action measure. The issue of maintaining trees will be addressed through Action 5.4 on developing a tree policy. It is not intended to seek a ban on tree felling but rather to encourage a better approach to their maintenance to try a promote a culture of better management to keep them in our landscape.

Allowing grass verges and wildflowers to grow during the pollinator feeding season should be addressed through the review of the Biodiversity Plan in Action 5.5.

Hedge cutting is already strictly controlled during the nesting season. Issues about hedge cutting should be address in the biodiversity plan.

Banning herbicide use is not a climate adaptation measure but it is something that could be looked at by the Climate and Biodiversity SPC as part of the response to the Climate and Biodiversity emergency.

Wicklow County Council has already committed to phasing out the use of single use plastics in its own activities. We do share concerns that such items contribute both to the unnecessary generation of waste and litter and will endeavour to focus awareness campaigns on their elimination or replacement as appropriate. Action 6.10 on awareness of the role of waste prevention, resource efficiency and the circular economy addresses this issue.

**Recommendation: issued addressed already. No further action required.**

**Sub No. 84: Dr Patricia Cusack**

**Summary of issues raised:**

- Gardens, as opposed to hard-standing, should be encouraged.
- Open green spaces should include more trees and shrubs.
- Greystones should have more allotments.

**Response to issues raised in submission:**

The loss of garden space to concrete is regrettable. Housing densities are now much higher under national guidelines in order to create higher density living which has the twin advantage of reducing urban sprawl into rural green space and also facilitates the development of car free transport including public transport and shorter walking and cycling routes. As we build with increasing densities and lower amounts of personal open space it is important to maintain good quality public open space with good use of shrub and tree planting. National guidelines set standards for the amount of public open space to be provided.

The recently produced food strategy discusses allotments. Food is an important cross cutting Climate action issue. The food strategy should be assessed to identify how it can assist in delivering Climate Action identifying which goals can help us deliver Climate Action. It is already proposed to include a new Action 6.13 Review Wicklow Food Strategy to review which goals and actions, including those developing local products and local markets or allotments can help to deliver on Climate Action.

**Recommendation: No Further action required.**

**Sub No. 85: Sophia Meeres**

**Summary of issues raised:**

- Document is long and difficult to read for the lay person, it contains no clear output and there is no executive summary.
- Public consultation this strategy has been minimal.
- Disappointing that mitigation has not been addressed and focus of the plan; economy first, people second and environment third, must be the other way round.
- There are no specific actions stated that mitigate against dependency on fossil fuels and loss of biodiversity.
- There must be actions to reverse the degradation of natural habitats(rivers, watersheds coastlines ...).
- Coastlines cannot be buried under rock and concrete nor walls built along watercourses.
- Information and data in the Strategy does not relate to Wicklow and should be sufficiently localised.
- There is no focus on the Marine and the changing zone between land and sea.
- Poor planning has resulted in car-reliant communities and building on flood plains which need stricter controls.

**Response to issues raised in submission:**

The Strategy is a technical document designed for in-house use to guide governance and operation over the lifetime of the strategy. As a result the language can be difficult those not working in the sector. We have already decided to extend to summary in response to prior submissions that the main document is difficult to read and this can help to inform people of how the strategy will address Climate Adaption.



Methodology used for consultation with the public and key stakeholders was as follows:

- Newspaper Notice in three local papers.
- Wicklow.ie
- Social media
- Public Participation Network
- Public presentations in Kilcoole and Bray
- Radio
- Engagement with adjoining Local Authorities...
- The CARO engaged with the Departments responsible for the development of sectoral adaptation plans inviting them to review the local authority adaptation strategies and to make submissions.
- The CARO identified key high level stakeholders according to their importance and relevance to the subject matter of local authority adaptation strategies and invited them to make review the local authority adaptation strategies and to make submissions.

Consultation went beyond what was required and beyond what most local authorities undertook. Wicklow County Council received one of the highest numbers of submissions of any of the local authorities in the country.

Wicklow County has produced a Climate Adaptation Strategy as required by statute. It did not set out to address mitigation measures in this strategy. It is clear that there is strong support throughout the county for Wicklow County Council to also address mitigation that will help attain a low carbon transition within its remit and assist where feasible others to achieve that goal. Wicklow County Council is already working with Sustainable Energy Communities in County Wicklow and will continue to support these communities and encourage others to engage in the programme. Mitigation measures are already a part of many work programmes and the Climate Action plan published by the government assigns further actions to local government and also will shift focus in many policy and economic development areas towards mitigation. Wicklow County Council will soon have to develop further actions in this area. It is important that the adaptation strategy recognizes the purpose of the Climate Action Plan and the role intended for Local Authorities to meet targets and contribute to the national climate ambition. Wicklow County Council will include an action to reflect this. *Action 1.20* Assess the range of and scope of existing mitigation measures already undertaken by Wicklow County Council and those that will be required under the Climate Action Plan.

The River Basin Management Plan is the appropriate plan for addressing the issue of the degradation of rivers and watersheds. We have included an action on working with LAWPRO on the water ways. Action 4.8 Coordinate with River Basin Coordinators regarding measures and funding/incentives for riparian buffers in priority water bodies, as a measure to accompany the work being done through the River Basin Management Plan.

Following consultation with neighbouring local authorities in Wexford and Waterford we have also decided to incorporate some new coastal protection actions as follows. . Action 2.11



Undertake a review of the current status of coastal erosion and protection measures, identifying areas that are vulnerable to increasing sea levels through CEFRAM maps in order to assess the effect of increasing tidal levels and inundation events. Action 2.12 Implement a monitoring and inspection programme for vulnerable areas of coasts, coastal protection works, harbours piers, marinas and quays, working with relevant external agencies to identify works that will protect them against rising sea levels. Action 2.13 Review Sea level exposed roads and Wicklow County Council managed harbours, piers and Quays to identify works required to protect these infrastructure assets. Action 3.7 Prepare a map of County Wicklow that projects increased tidal level heights at the year 2050. Action 5.11 Appoint consultants to carry out an assessment of works necessary to protect wetland and dune system sites identified as vulnerable which act as a natural defence to rising sea levels.

The protection of coastal areas and riparian communities from inundation will need to be assessed on a case by case basis. As already stated in the strategy the use of green infrastructure as mentioned in Action 4.5 Investigate best practice in storm runoff attenuation through the use of green infrastructure in urban open spaces is to be considered avoiding rock, concrete or walls when feasible. Such works will be used however can be used when necessary to protect communities and infrastructure.

Data for this strategy was sourced from Met Eireann and Climate Ireland who have the expertise to gather data from all available sources including local and regional weather station, marine weather stations and satellite data to compile an accurate picture of how weather changes and climate is evolving overtime. The work is undertaken by trained meteorologists and climatologists. It would be irresponsible to rely only on local data sets or to try and interpret local data without engaging experts in the field. The data sets were used to identify what events impacted on Wicklow and the extent of that impact.

Wicklow County Council has undertaken a Strategic Review of the Maritime for County Wicklow. The DAFM is the appropriate body to address management of the marine environment and the zone between land and sea.

Wicklow County Council as a planning authority works within guidelines established at national level and with regional guidelines in order to develop a County Development Plan which aims to protect people from development in unsuitable locations. The County Development Plan contains a strategic flood risk assessment. A flood risk assessment is required if it is intended to zone land for development. Flood risk assessments have been carried out for each of the existing Town Development Plans.

**Recommendation: Coastal issues are already being addressed through additional actions. No further action required with other issues raised.**

**Sub No. 86: Eoin Llewellyn**

**Summary of issues raised:**

- Supports the CWPPN Submission to the WCC Draft Climate Change Adaptation Plan July 2019 and the Protecting Our Home for Every Child submission.

**Response to issues raised in submission:**

Does not raise new issues.

**Recommendation: No further action required**

**Sub No. 87: Matt Wilson**

**Summary of issues raised:** Enquired about making a submission but none received

**Response to issues raised in submission:**

No issues to address.

**Recommendation: No further action required**

**Sub No. 88: Irish Water**

**Summary of issues raised:**

- Welcomes publication of the draft Strategy.
- Looks forward to collaborating with WCC in implementing the measures set out in the recently published Government Climate and Water Services Infrastructure published in May by the DHPLG, in particular as regards using Integrated Catchment Management (ICM) to provide a cost effective, sustainable means to reduce the sources of pollutants, and to slow, limit or restrict pathways of pollutants to water bodies.

**Response to issues raised in submission:** Irish Water is a key partner delivering water and waste water services in County Wicklow. Wicklow County Council has a close working relationship with Irish Water and this should be used to deliver on delivering common goals of ensuring a sustainable delivery of water services and maintenance of good water quality noting the use of Integrated Catchment Management. An action should be added to facilitate collaboration on Climate Adaptation. *Action 2.10 Engage with Irish Water to ensure collaboration on the provision of sustainable water services and the maintenance of good water quality.*

**Recommendation: Add Action 2.10 Engage with Irish Water to ensure collaboration on the provision of sustainable water services and the maintenance of good water quality.**

**Sub No. 89: Andrew Scanlon**

**Summary of issues raised:**

- Requesting more information on climate finance and carbon offset, at the county council level, including using Wicklow County Council as offset location for initiatives under the CDM
- No mention of climate science at county level is made, i.e. engagement with Met. Eireann and data gathering from local weather stations
- Climate Strategy should be linked to the Biodiversity Plan
- Wicklow County Council Strategy is not currently linked other actors' plans e.g. Coillte's and aspiration should be a single Wicklow Strategy covering all utility providers.
- Omitted from the strategy is how the Roads Section plans to move to a Green Transport approach – road focused approaches are doomed.

**Response to issues raised in submission:**

Climate financing and carbon offsetting through the CDM is a mitigation matter not an adaptation measure.

How Met Eireann and Climate Ireland collect data and what data they collect should be addressed to the relevant bodies. Wicklow County Council does not direct their work. Data for this strategy was sourced from Met Eireann and Climate Ireland who have the expertise to gather data from all available sources including local and regional weather station, marine weather stations and satellite data to compile an accurate picture of how weather changes and climate is evolving over time. The work is undertaken by trained meteorologists and climatologists. It would be irresponsible to rely only on local data sets or to try and interpret local data without engaging experts in the field and looking at the wider weather situation. The data sets were used to identify what events impacted on Wicklow and the extent of that impact.

Ireland reports to the CBD at national level rather than through local government. The 6th National Report to the Convention on Biological Diversity reports that Local Authorities fall under the responsibility of the DHPLG. Local authorities can have a direct influence on biodiversity through planning and environmental assessment. They also have a key input to biodiversity indirectly through their responsibility for local amenity including park management and green infrastructure, for example sustainable urban drainage. Specific biodiversity actions are modest, but most local authorities include Heritage Officers (supported through the Heritage Council) and four include Biodiversity Officers who can have an important influence on local planning. **Local Agenda 21** and the **EU LEADER Programme** are both important sources of funding for Local Authority support for environmental and biodiversity projects. In 2018, a grant scheme of €400,000 was made available by DCHG to County Heritage/Biodiversity officers to implement biodiversity actions at a local level, including workshops for school children, actions on invasive species, pollination, surveys of swifts (*Apus apus*) and the supply of nesting boxes for this species. Wicklow County Council has implemented the above measures as appropriate and further measures including supporting the work of schools on biodiversity through its Environmental Awareness Office. Wicklow County Council is guided by the National Biodiversity Plan in

implementing its own Biodiversity Plan which is the appropriate document for ensuring adequate consideration of biodiversity in all operations and activities of the organization. A key action in the Climate Strategy is to review the Wicklow Biodiversity Plan addressing Climate Change further, taking account of the Climate and Biodiversity emergency that has been declared by the elected members of Climate Change. Biodiversity is being integrated as appropriate into the Climate Adaptation Strategy.

As previously stated all local authorities are currently preparing climate adaptation strategies and the concurrent to this process twelve sectoral strategies are being developed one of which is strategy being developed by the DAFM which will cover forestry. Wicklow County Council is working with the bodies including the DAFM to ensure areas of common interest are addressed in a collaborative approach. Wicklow County Council has already added an action in response to submissions from the DAFM Action 6. 11: Develop a steering group to explore and develop common goals and objectives between Wicklow County Council and representatives from the farming, forestry, Parks and Wildlife Service and landowners sectors in rural and upland areas of the county. This does not represent a change in the remit of Wicklow County Council, giving oversight on the type of planting or management by Coillte of its lands, once they do so within planning guidelines and national environmental regulations. Wicklow County Council is putting in place processes to collaborate with utilities covered under sectoral strategies but must recognize that these utilities have a larger nationwide mandate and the key measure need at local levels is collaboration at local level to ensure national strategies align with local strategies and suit the needs of local communities in Wicklow.

Senior management are taking responsibility for Climate Adaptation. Actions 1.1 to 1.6 the first six actions in the strategy aim to create systems to ensure that Climate Action is given the highest consideration by the management team, and that they put in place structures to ensure that responsibility cascades down through the organizations developing adequate support structures and incorporating it into the key policies and plans for delivering work programmes across all services.

Commuting and car travel has been identified as key concern for the future development of County Wicklow. A large scale commuter survey was undertaken in 2018 with the results showing high levels of frustration with the daily car commute to work. Wicklow County Council is already assessing measures that can reduce the need to commute. Promotion and development of co-working hubs to facilitate working from their locality is more of a mitigation measure. It is already actively promoted through the Local Economic and Community Development Strategy. The introduction of remote working days is a measure that should be considered as a follow up measure to a staff commuting survey in Action 1.15. This action can be augmented to include a range of potential outcomes including remote working days, public transport, cycling or walking promotion. Council office space in other locations could offer opportunity for remote working. *Action 1.15 Undertake a staff commuter survey with result used to assess the feasibility of remote working days, or promotion of car pooling or cycling and walking to work.* Wicklow County Council has an opportunity to build further on the commuter survey using it and other data sets to create a more focussed approach in economic and community development on implementing measures to change commuting practices and create more opportunity to develop local alternatives to commuting. Wicklow County Council will add a new action 6.16 Facilitate cooperation between CCSD, LEO and Roads and Transportation services, to ensure they coordinate measures to reduce

dependence by the public on commuting for work, identifying measures to provide car independent work opportunities.

Wicklow County Council does envisage electric vehicles playing a role in transport going forward and in line with national policy under the National Climate Action Plan will work to promote their adoption in place of the petrol or diesel engines. Wicklow County Council will continue to work with SEAI and ESB networks to enable provision of EV charging points throughout the whole county.

**Recommendation: No further action required.**

**Sub No.90: Niamh McGinty**

**Summary of issues raised:**

- While the Strategy is a good start a stronger, data-driven Wicklow Climate & Biodiversity Plan is now needed, which references Wicklow Emergency dated 29<sup>th</sup> April 2019 and commit to Zero Carbon Emissions by 2030.

**Response to issues raised in submission:**

Issues proposed by the Wicklow Community for Climate and Biodiversity Action group have already been addressed previously. The draft Climate Adaptation Strategy put out for consultation was exactly as presented to the Council on the 29<sup>th</sup> of April. The Climate and Biodiversity Emergency was declared after the members voted to put the strategy out to consultation. We can now make amendments suggested through public consultation so will reference the emergency declared in the introduction.

**Recommendation: No action required.**

**Sub No.91: David Sullivan**

**Summary of issues raised:**

- Strongly opposed to 5G internet provision because of high energy consumption and resulting cutting down of trees.

**Response to issues raised in submission:** 5G is not a Climate Adaptation issue and will not be addressed through this strategy.

**Recommendation: No action required.**

**Sub No.92: Joan Campbell**

**Summary of issues raised:**

- Critical that the Strategy does not deal with mitigation.
- Critical that the strategy focuses only on the County Council's, as an organisation, own activities.
- Wicklow should aim to be a clean Energy Super Power and Climate Change leader.
- Emphasis should be on training the youth and developing the Green Schools Programme.
- Strategy is repetitive and vague with no targets or indices.

**Response to issues raised in submission:**

Wicklow County has produced a Climate Adaptation Strategy as required by statute. It did not set out to address mitigation measures in this strategy. It is clear that there is strong support throughout the county for Wicklow County Council to also address mitigation that will help attain a low carbon transition within its remit and assist where feasible others to achieve that goal. Wicklow County Council is already working with Sustainable Energy Communities in County Wicklow and will continue to support these communities and encourage others to engage in the programme. Mitigation measures are already a part of many work programmes and the Climate Action plan published by the government assigns further actions to local government and also will shift focus in many policy and economic development areas towards mitigation. Wicklow County Council will soon have to develop further actions in this area. It is important that the adaptation strategy recognizes the purpose of the Climate Action Plan and the role intended for Local Authorities to meet targets and contribute to the national climate ambition. Wicklow County Council will include an action to reflect this. *Action 1.20* Assess the range of and scope of existing mitigation measures already undertaken by Wicklow County Council and those that will be required under the Climate Action Plan.

The strategy is developed to deliver on climate adaption within the framework in which Wicklow County Council delivers its services. The intent is to deliver a programme of action which will deliver resilience in the operations of Wicklow County Council but more importantly help to create more resilient communities throughout the county.

This climate adaptation strategy focuses on delivering adaptation but also operates within a climate action framework that aims to deliver on mitigation. Wicklow County Council agrees that preventing Climate Change is more important than adapting and welcomes the guidance given in the Climate Action Plan on how local authorities and other sectors will deliver on mitigation.

Wicklow County Council shares the vision of creating a more positive future for all in County Wicklow and agrees that leadership and innovation will help us to lead here in Wicklow and also to demonstrate better practice across the country. Wicklow County Council hopes to see Wicklow leading on the supply of renewable energy, with potential to supply all existing users in County Wicklow and beyond, while respecting local communities in the county. Developing clean technologic solutions, zero carbon energy

in the county can help and already is helping to attract industry to County Wicklow. Job creation with clean technologies will assist in reducing the need for residents to commute out of the county for work.

A new action will be added, Action 6.18 Create a database of clean technologies operating in Wicklow, technologies offered elsewhere in Ireland and new technologies being developed outside of Ireland as a tool to focus attention on this sector in County Wicklow is being added in response to a previous submission.

Wicklow County Council has been active in working with Schools through Green Schools for twenty years and will continue to do so. An Taisce are developing a new Climate Action programme within Green Schools building on their Climate Ambassador programme. Wicklow County Council will support the roll out of this programme. The Environmental Awareness Office undertakes activities, workshops, seminars and competitions tailored to help schools explore the environment as part of the curriculum and will continue to develop unique projects to assist schools address awareness on Climate Change. An action will be added to Theme 6 on education in schools, 6.12 Support the delivery of Climate Action Awareness and education in County Wicklow schools through Green Schools and associated.

Action 1.5 does require the development of service indicators for adaptation measures. We will work with CARO, the regional office to develop key indicators looking to incorporate some that will be common to all local authorities, to allow cross comparison, and also where needed, some which may be specific to Wicklow. Action 1.4 requires the incorporation of Climate Adaptation into the service delivery programme which will allow for setting and monitoring of targets across the organisation at team and individual staff levels.

**Recommendation: Issued raised in this submission have been addressed elsewhere.**

**Sub No.93: Rory Fallon**

**Summary of issues raised:**

- A Wicklow Climate & Biodiversity Plan is now needed, which references Wicklow Emergency dated 29<sup>th</sup> April 2019 and commit to Zero Carbon Emissions by 2030.

**Response to issues raised in submission:**

Issues proposed by the Wicklow Community for Climate and Biodiversity Action group have already been addressed previously. The draft Climate Adaptation Strategy put out for consultation was exactly as presented to the Council on the 29<sup>th</sup> of April. The Climate and Biodiversity Emergency was declared after the members voted to put the strategy out to consultation. We can now make amendments suggested through public consultation so will reference the emergency declared in the introduction.

**Recommendation: No further action required.**

**Sub No.94: Office of Public Works**

**Summary of issues raised:**

- Welcomes the Strategy, the identification of flooding and extreme precipitation events as key climate impacts and the recognition that climate change may increase flood risk.
- Referencing previous co-operation between the 2 organisations, attention is drawn to the CFRAM maps, which map areas where there is a risk of floods currently and potentially in the future due to climate change. These are available at [www.floodinfo.ie](http://www.floodinfo.ie)
- Supports the promotion of flood protection schemes at Avoca River, Baltinglass, Blessington, Greystones & Environs, and Wicklow/Ashford within the Strategy. These schemes already consider climate change adaptation.

Wicklow County Council may wish to:

- include climate change impacts on “Land Use and Development Policy” under the category “Heatwaves and Drought” and also under “Snow and Ice/Low Temperatures”.
- Include climate change impacts on “Infrastructure and Built Environment” under the category “High Sea Levels and Coastal Flooding”.
- Require a risk analysis in Section 4 of the Plan to identify potential future impacts and vulnerabilities associated with the 2 previous points above.
- Add text outlining the requirements to review and update the plan to ensure that it stays up to date with evolving science, socio-economic consideration and experiences as per Section 6.4 “Update the Strategy” of the Local Authority Adaptation Strategy Development Guidelines as published by the DCCA

**Response to issues raised in submission:**

During consultation with staff of Wicklow County Council to identify the impacts from weather events no significant impacts were identified relating to heatwaves, drought or Snow and Ice/low temperature. It is clear however that Climate Change is an evolving issues and where issues are indentified in the future the strategy and work programmes will be tailored to respond to evolving issues. The process did identify impacts relating to infrastructure and built environment under High sea level and coastal flooding but at the time it discussions and recording of information focused particular attention on the impact on operations. The strategy should be amended to document that high sea levels and coastal flooding also impact on ht built environment and infrastructure.

Wicklow County Council agrees that science, socio economic considerations and experiences will evolve in what is a rapidly developing field. Wicklow County Council will need to be flexible adapting new measures as needed and when opportunities or requirements necessitate further



**Recommendation: Update Page 53 Climate Hazard High Sea Level and Coastal Flooding should be updated to reflect that it will impact on Built Environment and Infrastructure demonstrating here that it impacts here as well as in Governance and Operations. This will need to follow through into the risk analysis.**

**Sub No.95: Cllr. Sylvester Bourke**

**Summary of issues raised:** Land use Policy needs to be changed as there is a lot of land owned by the council left vacant.

**Response to issues raised in submission:** The Climate Adaptation Strategy is not the appropriate document for addressing how WCC manages its land bank where there are no immediate plans to develop or where parcels of land are left over following development of infrastructure or housing. The Corporate Development Plan, Action 1,2, would be a better space to address how land assets are managed. There are opportunities to use such land either through short term management for biodiversity or longer term planting with trees as a Climate Action measure. Action 5.1 Develop a strategy to undertake and implement an active Tree Planting programme with mapping of sites suitable for planting in the context of climate adaptation in conjunction with an awareness campaign that informs of the benefits to communities in improving air quality, offsetting carbon emissions, promoting biodiversity, limiting flood risk, reducing urban heat, as well as aesthetic value has already been amended following a previous submission to include mapping of sites suitable for planting.

**Recommendation: No further action required in this strategy but the issue should be addressed through the Corporate Development Plan offering scope to develop biodiversity actions.**

**Sub No.96: CARO**

**Summary of issues raised:** Following the preparation of draft Climate Adaptation Strategies by local authorities the CARO regional office suggested consulting with neighbour local authorities on coastal protection measures in order to share best practice.

**Response to issues raised in submission:**

Wicklow consulted with Wexford County Council and Waterford County Council and has decided following this consultation to incorporate several new actions . Action 2.11 Undertake a review of the current status of coastal erosion and protection measures, identifying areas that are vulnerable to increasing sea levels through CEFRAM maps in order to assess the effect of increasing tidal levels and inundation events. Action 2.12 Implement a monitoring and inspection programme for vulnerable areas of coast, coastal protection works, exposed roads

and railways, harbours, piers, marinas and quays, to identify works that would protect them against rising sea levels. Action 2.13 Collaborate with relevant external agencies to identify, fund and programme works to protect coastal infrastructure assets. Action 3.7 Prepare a map of County Wicklow that projects increased tidal level heights at the year 2050. Action 5.11 Appoint consultants to carry out an assessment of works necessary to protect wetland and dune system sites identified as vulnerable which act as a natural defence to rising sea levels.

**Recommendation: Add Action 2.11 Undertake a review of the current status of coastal erosion and protection measures, identifying areas that are vulnerable to increasing sea levels through CEFRAM maps in order to assess the effect of increasing tidal levels and inundation events. Action 2.12 Implement a monitoring and inspection programme for vulnerable areas of coast, coastal protection works, exposed roads and railways, harbours, piers, marinas and quays, to identify works that would protect them against rising sea levels. Action 2.13 Collaborate with relevant external agencies to identify, fund and programme works to protect coastal infrastructure assets. Action 3.7 Prepare a map of County Wicklow that projects increased tidal level heights at the year 2050 and 2100. 5.11 Appoint consultants to carry out an assessment of works necessary to protect wetland and dune system sites identified as vulnerable which act as a natural defence to rising sea levels.**

**Sub No.97: CARO**

**Summary of issues raised:** Wicklow County Council discussed with the CARO regional office the issue of ensuring that County Wicklow's adaptation strategy fully engages with the twelve sectoral strategies being developed at national level. Several public submission voiced concerns that strategies for the sectors and that of Wicklow County Council may not fully integrate. As the sectoral strategies are also in preparation at the moment it is not feasible to adopt shared actions at the moment.

**Response to issues raised in submission:** In order to progress the strategy while taking account of the sectors as relevant going forward a new action will be added. *Action 1.25 Liaise, collaborate and work in partnership with the sectors identified in the NAF, subject to funding and resources in the delivery of the Government approved sectoral adaptation actions, where they relate and are relevant to the functions and activities of the council at local level or in local communities.*

**Recommendation: Add Action 1.25 Liaise, collaborate and work in partnership with the sectors identified in the NAF, subject to funding and resources in the delivery of the Government approved sectoral adaptation actions, where they relate and are relevant to the functions and activities of the council at local level or in local communities.**