

## Submission by Dingle Hub to the Public Consultation on the draft

### Kerry County Council Climate Action Plan (November 2023)

#### 1. Introduction

The Dingle Hub is pleased to be offered this opportunity to make this submission on the draft Kerry County Council Climate Action Plan (November 2023) and we compliment Kerry County Council (KCC) on producing this draft. We appreciate the amount of work that has gone into the preparation of this draft Climate Action Plan (CAP) and our comments are made in good faith so that the final CAP, when implemented by end 2029, is such that it can deliver the ambitions set out in the plan – to reduce the emissions by 2030 and to put in place the appropriate climate adaptation and mitigation measures that will enable County Kerry to be suitably prepared for addressing the challenges posed by climate change and biodiversity loss.

We have previously made a [detailed submission](#) to Kerry County Council<sup>1</sup> as part of the initial consultation process, so, rather than going through in detail this draft CAP and the Annex of Actions, we consider that there are some significant issues with the national guidelines that need to be addressed, as these set the framework within which the County Kerry CAP and all other CAPs are written.

#### 2. Executive Summary

Dingle Hub acknowledges the effort behind Kerry County Council's draft Climate Action Plan (CAP) and appreciates the opportunity to provide feedback. While the draft demonstrates dedication, there are fundamental concerns with the national guidelines framing the CAPs, impacting their efficacy and alignment with the intended objectives. This summary outlines critical points requiring attention:

**Guidance Discrepancies:** The Local Authority Climate Action Plan Guidelines emphasize local leadership in climate action. However, inconsistencies exist between the guidelines' ambitions and the practical implementation observed in the draft CAPs. This positions Local Authorities more as a bystander, e.g., only taking responsibility for 0.2% of total GHG emission reductions in Co. Kerry

**Limited Accountability:** The current guidelines confine local authorities to primarily internal actions, absolving them of shared/joint accountability for broader community climate initiatives. This narrow scope inhibits meaningful contribution to emission reduction targets, shifting significant responsibility to communities and central government.

**Lost Opportunity for Local Leadership:** The guidelines inadvertently limit local authorities' potential to assume a leadership role in addressing climate change and biodiversity loss. This undermines the opportunity for these entities to demonstrate proactive involvement, leading to potential adverse impacts on affected communities.

**Lack of Comprehensive Actions:** The CAP lacks specificity, failing to outline SMART (Specific, Measurable, Assigned, Realistic, Time-bound) actions necessary for achieving the targeted 51% emission reduction by 2030 and implementing adequate mitigation and adaptation measures. The financial and human cost of failing to act will be a multiple of the upfront investment in SMART actions now.

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<sup>1</sup> <https://consult.kerrycoco.ie/en/submission/ke-c12-63#attachments>

**Inadequate Response to Risks:** Despite identifying key climate risks like flooding, coastal erosion, and severe windstorms, the CAPs fall short in proposing comprehensive actions, relegating the local authority's role to a mere facilitator rather than a proactive participant in managing these risks. There is a risk of mounting frustration if there is insufficient and delayed action and severe impact on communities due to inadequate response on climate change.

In conclusion, while the intent and effort behind the draft CAP are evident, the current national guidelines inhibit local authorities' ability to be proactive leaders in tackling climate change. Rectifying these shortcomings is crucial to empower local authorities, ensuring their active participation and shared accountability for achieving necessary climate goals, ultimately benefiting both local communities and the broader environmental landscape.

### **3. Guidance for local authorities on the preparation of Climate Action Plans**

Guidance on the preparation by local authorities of Climate Action Plans is provided in [Local Authority Climate Action Plan Guidelines](#)<sup>2</sup> and we note the aspiration for climate leadership by local authorities (p.6).

*“Set against the backdrop of an evolving and more rigorous framework of national climate policy, local government maintains a strong commitment to pursuing a leadership role on climate action. In Delivering Effective Climate Action 2030 (DECA 2030), the local government strategy on climate action, an overarching commitment on leadership is highlighted to ensure a coherent approach to climate action across the administrative and political structures of all 31 local authorities.*

*“This commitment acknowledges how well positioned local authorities are in their close relationships with their communities. It builds upon their extensive knowledge of the natural and built environments within their functional areas. It acknowledges their already established engagement in climate action measures with examples such as: emergency response to severe weather events, flood alleviation measures, infrastructural provision, supporting the transition to sustainable transport, protection of the natural environment, energy efficiency and reduction and housing retrofits for social housing and privately owned property.”*

The above statement is from the *Delivering Effective Climate Action 2030 (DECA 2030)*<sup>3</sup> and it is clearly stating that “local government maintains a strong commitment to pursuing a leadership role on climate action”, which is what would be expected from local government.

In the guidance to local authorities, [Local Authority Climate Action Plan Guidelines](#), there are what appear to be inconsistencies in the Guidelines that, we consider, will likely undermine the overall purpose of the legislation and certainly undermine the commitment that local authorities will ‘pursue a leadership role on climate action’.

For example, in the Guidelines (p.9), the following is stated:

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<sup>2</sup> <https://assets.gov.ie/250048/e508312c-39c4-4a78-a7ad-c855afc501e6.pdf>

<sup>3</sup> County and City Management Association [CCMA] (2021): Delivering Effective Climate Action 2030: Local authority sector strategy for delivering on the Climate Action Charter and Climate Action Plan. Dublin: Local Government Management Agency [LGMA]. Available online at: [delivering-effective-climate-action-2030.pdf](#) (lgma.ie)

Through the development and implementation of specific, action-focused, time-bound and measurable actions, the local authority climate action plan will:

- Provide a strong emphasis on a place-based approach to climate action, delivering a better understanding of greenhouse gas emissions and climate-related risks at a local level, while addressing context-specific conditions and support for locally tailored policy making.
- Deliver and promote evidence-based and integrated climate action by way of adaptation and mitigation measures, centred around a strong understanding of the role and remit of the local authority on climate action.
- Translate and provide strategic direction at local and community levels on the delivery of the national climate objective which is seeking to curb further global warming and to transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy by no later than the end of 2050.

From the draft Kerry County Council Climate Action Plan, it is hard to see how these aspirations could be met.

We propose to cite three examples, below but there are many other issues that should be reviewed prior to publication of the final Climate Action Plans.

#### 4. Full Accountability of Local Authorities is severely limited

The Guidelines state, as follows (p.13):

*“The scope includes areas for which a local authority will have a full mandate, can exert its influence more broadly to maximise and support the climate action efforts of other stakeholders and can assume a co-ordination and facilitation role, as well as a broader advocacy role on climate action.*

*“For the purposes of the local authority climate action plan and informing how actions are devised, it is important to define the four scales at which local authorities maintain responsibility on climate action:*

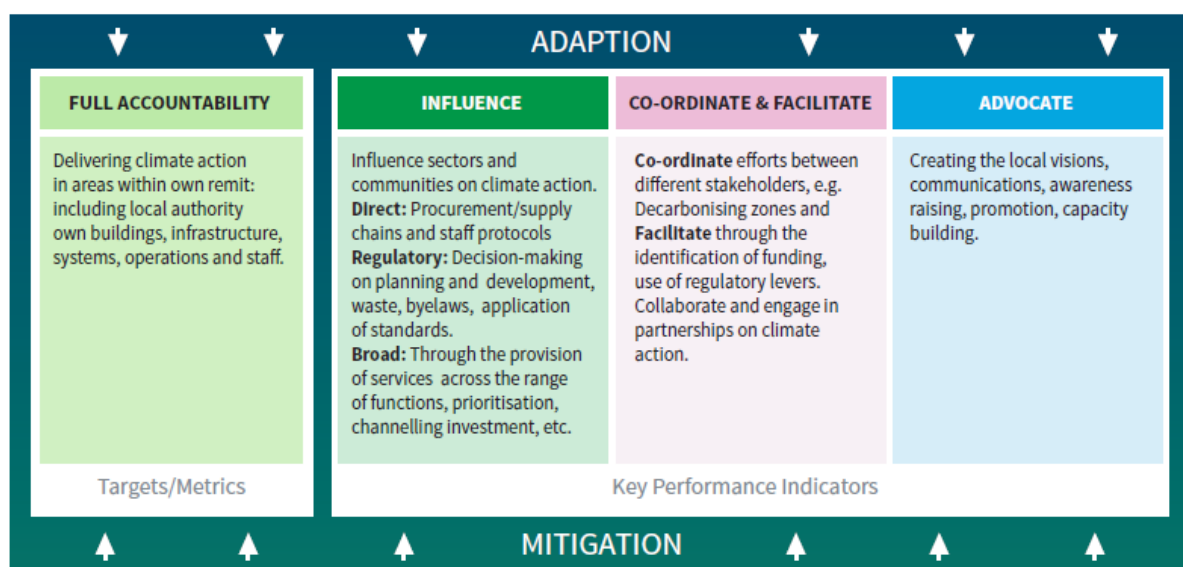


Figure 1: Local authority scope on climate action (source CCMA/CARO).

*“1. Full accountability for climate action within the local authority, which includes tracking and reporting on the reduction of emissions from their own internal operations, buildings and facilities (including transport fleet, public lighting, retrofitting social housing, the provision of infrastructure etc.) in addition to building resilience to the negative impacts of climate change, within the organisation, through the range of services and functions provided.*

*“2. Influence sectors, business, communities and individuals in the delivery of local climate action through the various functions and services provided, as well as using many regulatory levers and the sector's broader remit to enable, facilitate and support them.*

*“3. Co-ordinate and facilitate by bringing together key stakeholders, engaging in partnerships to maximise efforts and creating interactions that will yield successful initiatives and projects which may not otherwise occur.*

*“4. Advocate for climate action by raising awareness, communicating and engaging in open dialogues on climate related issues and responses. “*

The document clearly states that *‘the local authority has only full accountability for climate action within the local authority, which includes tracking and reporting on the reduction of emissions from their own internal operations, buildings and facilities (including transport fleet, public lighting, retrofitting social housing, the provision of infrastructure etc.) in addition to building resilience to the negative impacts of climate change, within the organisation, through the range of services and functions provided’.*

By way of example, Kerry County Council (KCC)<sup>4</sup>, presumably following this advice, is stating in the [Draft Kerry County Council Climate Action Plan](#)<sup>5</sup> that it only has 'full accountability' for its own internal actions, which should deliver a reduction of 2,657 tCO<sub>2</sub> by 2030. This reduction is 0.21% of the total emission reductions required in County Kerry as a whole, leaving the local communities and others to deliver the 99.79% reduction in emissions.

Lest there be any doubt, the following statement appears on page 16 of the Plan:

*“It is important to re-iterate that these are the only GHG emissions in the county that KCC will have full responsibility and will be fully accountable...”*

In our opinion, there is a requirement to include an additional column, titled **'Shared/Joint Accountability'**, as it entirely undesirable that local authorities would be at such distance from substantive levels of 'Shared / Joint Accountability' for so many initiatives (e.g in transport, flooding, coastal erosion, etc.) and that the role of local authorities would be limited to 'influencing', 'co-ordinating', 'facilitating' and 'advocating' but without more meaningful 'shared/joint accountability' for the delivery of the required actions.

In our opinion, the current Guidelines are incompatible with the aspirations of local government as outlined in their own publication, *Delivering Effective Climate Action 2030 (DECA 2030)*.

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<sup>4</sup> While using County Kerry CAP as an example, there is no reason to presume it is any different from other counties.

<sup>5</sup> [https://consult.kerrycoco.ie/en/system/files/materials/2289/KCC\\_LACAPFinal.pdf](https://consult.kerrycoco.ie/en/system/files/materials/2289/KCC_LACAPFinal.pdf)

The outcome of this gap in local authority accountability will be increased direct responsibility for local climate adaptation measures and outcomes on central government. The scale of this is enormous. This is likely to lead to frustration at community level.

**5. The Local Authority Climate Action Plans should specify, over the full duration of the Plan, the actions required to deliver 51% reduction in emissions by 2030 and the actions that will mitigate against the impacts of climate change**

The Climate Action Plan covers the period 2024-2029 and, as such, the actions listed in the Plan should be capable of demonstrating that, if the actions are delivered in accordance with the Plan, the nett result should be (by the end of the period) that the emissions are reduced by almost 51%, with the final (relatively small) emissions being reduced by 51% by the end of year 2030. Also, the necessary mitigation and adaptation actions should also be in place by 2030.

To enable this to happen, it should be made clear that the Climate Action Plan should be comprehensive and include the detailed SMART (specific, measurable, assigned, realistic and time-bound) actions that will deliver the emission reduction by 2030 and the other requirements.

The starting point for the adaptation and mitigation actions should be the Risk Section, which should set up the basis for the remainder of the Plan in addressing the scale and timeline for what needs to be done.

By way of example, in the [Draft Kerry County Council Climate Action Plan](#), it is stated as follows:

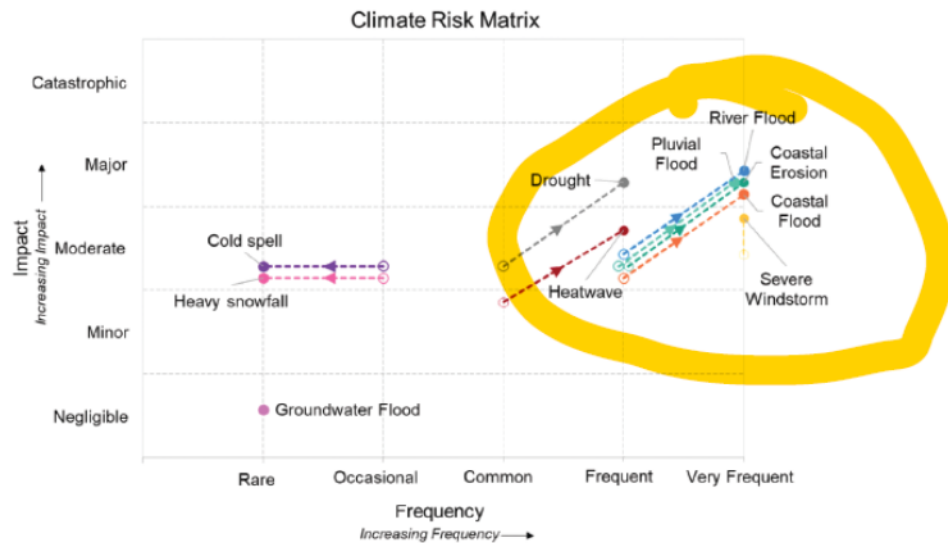
*"Kerry sets a clear pathway for Kerry County Council to:*

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

Studying the Plan, it is clear that there is not 'a clear pathway' and they are certainly not comprehensive actions that will deliver the 51% reduction in emissions by 2030 and also mitigate and adapt against the known hazards. This Climate Action Plan covers the period 2024-2029 so it is presumed that, within the Plan, the specified actions would be comprehensive, covering that full period (to 2029) and designed to deliver very close to a 51% decrease in emissions by the end of the Plan period. That is not clear at all from the Plan.

The emission reduction required by Kerry County Council (internally) is 2,657 tCO<sub>2</sub>, which is 0.21% of the total emission reductions required in County Kerry as a whole. The emission reduction required of Corca Dhuibhne/Dingle Decarbonisation Zone (DZ), is 126,480 tCO<sub>2</sub>eq, which is a 9.96% of the total emission reductions required in County Kerry as a whole. It is also 48 times the emission reduction required of KCC (internally).

Similarly, Kerry County Council, in its Climate Risk Matrix, identifies flooding (river, pluvial, coastal), coastal erosion and sever windstorms as the greatest risk for County Kerry.



**FIGURE 4-9 | Climate Risk Matrix for Kerry: on the right shows the future change in risk with the hollow marker showing the current risk and the solid marker the future risk. The dotted line shows the change between the current and future risk**

Yet, in the Climate Action Plan, the Council only sees its role in respect of mitigation and adaptation actions to address flooding risk as to ‘Ensure flood alleviation schemes listed in OPW flood management plans are facilitated and supported, having due regard to the need to promote nature-based solutions and Sustainable Drainage Systems, and environmental sensitivities at these locations, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.’

The timeline is defined as ‘Long term’ and the KPI is ‘Number of Schemes’.

We would suggest that it is inconceivable that the citizens would expect the local authority would see itself as more an ‘interested bystander’ and not to take shared/joint accountability for managing the mitigation and adaptation efforts in the county, not least in respect of flooding, coastal erosion and windstorms and to see these (at least some of these works and other ‘softer’ forms of community preparedness measures) completed in the short-term and not long term.

**6. While the use of SMART objectives/targets are specified in the Guidelines, the listed Actions are generally not SMART**

The [Local Authority Climate Action Plan Guidelines](#) state (on page 20), the following:

*“In tailoring actions as part of the place-based approach to climate action, the SMART approach to the development of actions is encouraged whereby actions identified are Specific, Measurable, Assigned, Realistic, Time-bound.”*

By way of example, in the [Draft Kerry County Council Climate Action Plan](#), there is a notable absence of SMART actions, with the use of such phrases as ‘continue to promote’, etc. – which means these actions are not specific, measurable, assigned, realistic and time-bound.

There is a stated aim (p. 7) *'to be a leader in Climate Action at a local, community-based level'* but there are no SMART objectives or targets to support this aim and it is not clear how the work on the decarbonisation zone will be extended to cover the whole county, as will be required.

It raises the issue of what SMART actions are proposed to ensure that the remainder of County Kerry can meet the emission reduction of 51% while also ensuring that the necessary mitigation and adaptation actions are put in place to ensure that the whole county is properly prepared by 2030.

## **7. Conclusion**

While accepting that there may be a genuine interest by local authorities and, particularly, Kerry County Council, to respond to (and be seen to respond to) the climate and biodiversity crises, the [Local Authority Climate Action Plan Guidelines](#) do not require or encourage leadership from local authorities. In this regard, there is a lost opportunity for the local authorities to take on new responsibilities that would help re-position the local authorities as key leaders in addressing what is seen as the existential crises of this generation – the twin issues of climate change and biodiversity.

On the contrary, the [Local Authority Climate Action Plan Guidelines](#) endeavour to remove from local authorities most accountability for climate action and to position the local authorities more as 'interested bystanders' who are only mandated to 'influence', 'coordinate', 'facilitate' and 'advocate' but not take shared/joint accountability for the delivery of the required actions, which will be essential if the challenges are to be met.

This is a lost opportunity for local authorities to reposition themselves and make local authorities visible, energetic leaders in addressing climate change and biodiversity loss. Given the severity of impacts already being felt in 2023, the failure to create a more muscular, engaged role for local authorities will have massive consequences for the impacts that will be experienced over the period to 2030 and beyond. This cannot be expected to be tolerable for impacted communities.