



CONSULTANTS IN ENGINEERING,  
ENVIRONMENTAL SCIENCE &  
PLANNING

# LOCAL AUTHORITY CLIMATE ACTION PLAN

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## Strategic Environmental Assessment Statement

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**Prepared for:**

**Limerick City and County Council**



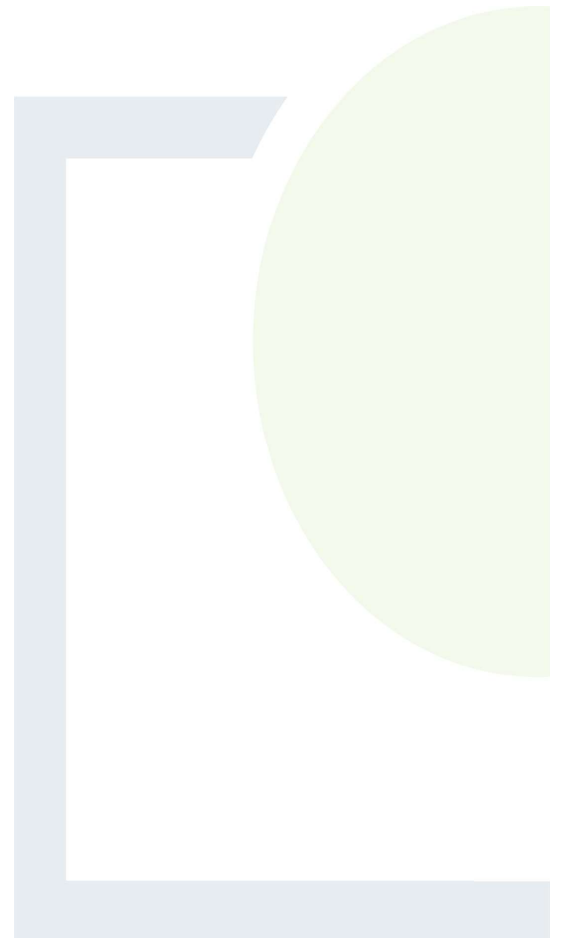
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Core House, Pouladuff Road, Cork, T12 D773, Ireland

T: +353 21 496 4133 | E: [info@ftco.ie](mailto:info@ftco.ie)

**CORK | DUBLIN | CARLOW**

[www.fehilytimoney.ie](http://www.fehilytimoney.ie)



## Strategic Environmental Assessment Statement

### REVISION CONTROL TABLE, CLIENT, KEYWORDS AND ABSTRACT

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**Abstract:** Fehily Timoney and Company is pleased to submit this Strategic Environmental Assessment Statement for the Limerick Local Authority Climate Action Plan to Limerick City and County Council for publication alongside the Plan. This Statement provided information on the decision in accordance with Article 16 of S.I. No. 435/2004 - European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (as amended).

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## 1. INTRODUCTION

### 1.1 Background

Limerick City and County Council (LCCC) have adopted the Limerick Local Authority Climate Action Plan (LACAP) 2024 - 2029. This is the Strategic Environmental Assessment (SEA) Statement for the LACAP. This SEA Statement provides information on the following:

1. How Environmental Considerations were integrated into the LACAP.
2. How the SEA Environmental Report and consultation submissions and observations on it have been taken into account during the preparation of the LACAP
3. The reasons for choosing the LACAP as adopted, in the light of the other reasonable alternatives considered.
4. The measures decided concerning monitoring the significant environmental effects of implementation of the LACAP.

The EPA in their Guidance on Strategic Environmental Assessment (SEA) Statements and Monitoring (2023) succinctly summarize the role SEA Statement have under the SEA process, as follows: *'SEA Statements have the potential to play a central role in summarising the effectiveness of the SEA process. They can capture how environmental considerations have shaped the plan/programme (e.g., through policy wordings, revisited zonings and other measures) and how the process has contributed to making the plan or programme more sustainable'*.

### 1.2 Legislative Context

SEA is required under the EU Council Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment (the SEA Directive)<sup>1</sup>. The SEA Directive requires that an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.

The overarching objective of the SEA Directive is *'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'*<sup>2</sup>

SEA is described within the Department of the Environment, Community and Local Government's (2004) Guidelines for Regional Authorities and Planning Authorities on the Implementation of SEA Directive (2001/42/EC) as the *'formal systematic evaluation of the likely significant environmental effects of implementing a plan or programme before a decision is made to adopt the plan or programme'*.

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<sup>1</sup> Transposing Irish Regulations: S.I. No. 435 of 2004 (European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004, as amended by S.I. No. 200 of 2011 (European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011). S.I. No. 436 of 2004 (Planning and Development (Strategic Environmental Assessment) Regulations 2004, as amended by S.I. No. 201 of 2011 (Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011).

<sup>2</sup> Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment – Guidelines for Regional Authorities and Planning Authorities (Department of the Environment, Community and Local Government, 2004)



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Article 16 of S.I. No. 435/2004 - European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (as amended) requires that a competent authority provide information on the decision to approve a Plan that has been subject to SEA. Article 16(2)(b) requires that a statement is produced summarized, inter alia, how environmental considerations have been integrated into the plan or programme subject to SEA.



## 2. HOW ENVIRONMENTAL CONSIDERATIONS WERE INTEGRATED INTO LOCAL AUTHORITY CLIMATE ACTION PLAN 2024 - 2029

### 2.1 SEA Scoping

The first stage of the SEA process was to carry out SEA Screening to determine the requirement for SEA of the LACAP. It was determined the LACAP was a statutory Plan and had the potential to give rise to likely significant environmental effects and therefore SEA is required for the Plan.

The second stage of the SEA process was carrying out SEA Scoping. The purpose of SEA Scoping is to establish the spatial and temporal scope of the SEA and a decision-making framework that can be used to evaluate impacts of the LACAP. A SEA Scoping Report was produced to document the scoping process. The SEA Scoping Report outlined information on the emerging LACAP, including the need for the LACAP, its temporal and geographical area and overall objectives. It facilitated scoping the Environmental Components and understanding the environmental issues to be considered under the SEA process.

A copy of this report was made available to the statutory Environmental Authorities. Environmental Authorities made scoping submissions on the SEA Scoping Report. The SEA Scoping Report was finalized in light of these submissions. The SEA Scoping Report, along with SEA scoping consultation submissions and consideration of these submissions by the SEA process, helped communicate and define the scope of the environmental issues which are to be dealt with by the SEA, the methods which will be used to address these issues, and the level of detail required to address these issues, as per the SEA Guidelines<sup>3</sup>. Summary detail on the scoping consultation submissions received from Environmental Authorities and how these were taken into account during the SEA process is presented in Table 2-1.

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<sup>3</sup> Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment Guidelines for Regional Authorities and Planning Authorities (DEHLG, 2004), Page 18: "It is recommended that at the end of the scoping procedure, the plan-making authority should prepare a brief scoping report of its conclusions as to what information is to be included in the environmental report, taking account of any recommendations from the environmental authorities."



**Table 2-1: Summary Detail on Scoping Consultation Submissions Received from Environmental Authorities**

Environmental Authority	Summary on the Scoping Consultation Submission	How was this submission taken into account during the SEA?
Department of Agriculture, Food and the Marine	An overview on how climate resilience could be promoted in agriculture setting was provided (e.g., maintaining a fodder reserve, measures to promote biodiversity and carbon sequestration, measures to improve soil structure and function). An overview of Ireland's seafood industry and maritime sectors was provided.	The content of this submission served to inform the focus of the environmental assessment of agriculture related action defined in the LACAP. It informed the nature and focus of mitigation measures defined for related climate mitigation and adaptation action defined in the LACAP. A number of Environmental Governance principles defined in the LACAP specifically reflect the recommendations contained in this submission.
Department of Housing, Local Government and Heritage	The Department advised that protection of built and archaeological heritage should be taken into account during the plan-making process. The Department made recommendations regarding heritage-related strategies that a local authority should consider during the plan-making and implementation stages.	All advice with respect to the potential impacts of the LACAP on built and archaeological heritage was considered during the environmental assessment process. The need to assess and mitigate the effects of infrastructure supported by the Plan was one aspect that underpinned the SEA.





## 2.2 Environmental Assessment and Mitigation

Taking into account the scope detailed in the SEA Scoping Report which was produced for the initial draft version on the LACAP, the environmental effects associated with the implementation of the LACAP were identified, evaluated and described in a SEA Environmental Report.

This report defined mitigation measures to prevent adverse environmental effects due to the implementation of the LACAP. The following forms of mitigation have been adopted to ameliorate the negative environments of the LACAP and maximize potential positive effects of the plan:

- Mitigation through consideration of alternatives.
- Mitigation through integration of environmental considerations into the LACAP.
- Mitigation through consideration of development management standards/environmental protection objectives contained in the CDP.

### 2.2.1 Mitigation through consideration of alternatives

A number of alternatives were considered at an early stage in the process. The environmental effects of these alternatives were evaluated during the SEA process. Detail on how Plan alternatives and their environmental effects were considered during plan-making is provided in Section 3.

### 2.2.2 Mitigation through integration of environmental considerations into the LACAP

The plan making process was carried out in parallel with the SEA and AA processes. Regular communication and interaction took place between the environmental assessment team and the plan making team. Environmental considerations that came to light during the SEA and AA processes, including consultation processes, were regularly communicated to the plan making team during the plan making process. As necessary, environmental mitigation measures to ameliorate the potential negative environmental effects of implementing the LACAP were developed and then integrated into the LACAP. Much of the environmental mitigation was embedded in the plan early on in the process as a result of this. This process was carried out in an iterative manner to ensure optimal plan making and environmental outcomes. Environmental considerations were also integrated into the plan so as to facilitate maximizing identified positive environmental effects of the LACAP.

Mitigation measures were suggested that maximize the co-benefits of climate action for other environmental components such local air quality, human health, biodiversity, water quality and other interrelated areas (i.e., win-win solutions).

Additional text clarifying environmental protection related obligations and environmental enhancement opportunities has been attached to a variety of defined actions in the plan. This text has been shaped to ensure that environmental considerations are appropriately taken into account during plan implementation. This text has also been shaped to ensure plan implementation generates the minimum level of negative environmental effects and the maximum level of positive environmental effects. These text additions are presented in Table 2-2.

Several environmental governance principles were established to ensure plan implementation generates the minimum level of negative environmental effects and the maximum level of positive environmental effects. These environmental governance principles shall underpin and guide plan implementation and shall apply to and be integrated into all actions/activities which result due to the implementation of the plan. These principles are defined in Table 2-3. The principles were incorporated into the plan itself.



These environmental mitigation measures were integrated into the LACAP and will prevent negative effects and maximize positive effects associated with the LACAP.

**Table 2-2: Proposed Environmental Mitigation Measures - Additional text included in Plan actions relating to environmental protection related obligations and environmental enhancement opportunities**

LACAP Action Reference	LACAP Action	Mitigation Measure
T1	Increase the use of public transport through the implementation of the bus connects programme	Attach the following text to the action: "Promote - through control or influence, as appropriate - project adherence to planning and environmental protection criteria."
T2	Develop and implement a park and ride strategy.	Attach the following text to the action: "having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, traffic and transport conditions and cultural heritage."
T3	Examine the feasibility of the provision of new greenways either within disused rail lines or immediately adjacent to existing or proposed rail corridors	Attach the following text to the action: "having due regard to environmental sensitivities such as archaeology, European sites, biodiversity and amenity value, and the potential to enhance ecological connectivity"
T4	Implement the Active travel programme in particular the Limerick Metropolitan Cycle Network Study	
T5	Deliver a network of secure, public bicycle and powered personal transportation parking, to accommodate a variety of bike types across the County, including at schools, parks, playgrounds, towns, and villages.	Attach the following text to the action: "having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, and local air quality."
T7	Prepare an EV charging strategy to support city / town centre charging as well as destination charging locations	Attach the following text to the action: "having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, and cultural heritage."
T10	Implement a bridge rehabilitation programme that is resilient to the impacts of Climate change	Attach the following text to the action: having due regard to the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations, and the need to not negatively impinge on any protected species or European sites.
T11	Carry out maintenance and rehabilitation of regional and local roads in accordance with the guidance document on the climate adaptation of regional and local roads	Attach the following text to the action: "having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, and local air quality."
T12	In road construction projects, minimise the use of virgin materials and promote the use of reclaimed asphalt pavement (RAP) or low carbon alternatives	In road construction projects, minimise the use of virgin materials and promote the use of reclaimed asphalt pavement (RAP) or low carbon alternatives. Ensure material reuse takes place in accordance with Regulation 27 and 28 of the Waste management Act and materials reused are inert and environmentally non-hazardous.
T14	Assess individual vehicles of the Class (GVW) available in EV format. Ascertain the minimum annual KM to be of benefit as a change from ICE (Internal Combustion Engine) to EV. Agree a fleet	Attach the following text to the action: "whilst ensuring appropriate end-of-life management practices are in place for Electric Vehicles under the ownership of local authorities."



LACAP Action Reference	LACAP Action	Mitigation Measure
	replacement plan to comply with SI-381-2021.	
T15	For the vehicles that will not migrate to EV, assess EURO Stage emissions and look at replacements with newer improved emission levels. Alternatively switch from DERV to HVO (Hydrotreated Vegetable Oil) proposed test at Park Road depot before rolling out to main depots	Attach the following text to the action: "Ensure renewable fuels procured by the local authority are sourced from sustainable sources."
T16	Assess depots etc for suitability for EV charging and parking to include potential for solar generation to support charging.	Attach the following text to the action: "Ensure development supported by the strategy is delivered in a manner that has due regard to environmental sensitivities (European sites, biodiversity, built heritage, glint and glare impact) and available grid capacity."
B2	Prepare a renewable energy strategy for Limerick incorporating all forms of renewable energy including integrated renewables that will guide the development of new energy infrastructure in the county	Attach the following text to the action: "This strategy shall be informed by planning and environmental protection related considerations and constraints."
B3	Implement the Catchment Flood Risk Management (CFRAM) programme across Limerick following the OPW Plans (2016) for Athea, Adare, Askeaton, Croom, Foynes, Newcastlewest, Rathkeale, Castleconnell and Limerick City and Environs	Attach the following text to the action: "Ensure due regard is given to promoting Sustainable Drainage Systems, nature-based solutions, and environmental sensitivities, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology."
B4	To support communities to be make the transition to EV it is necessary to set out a strategy for the development of a public charging network across the county that is based on site suitability, grid capacity and demand. The strategy will identify both on street and off-street options including the provision of eMaaS hubs.	Attach the following text to the action: "Ensure development supported by the strategy is delivered in a manner that has due regard to environmental sensitivities (European sites, biodiversity, built heritage) and available grid capacity."
B7	Support owners of historic building to carry out appropriate retrofitting initiatives by developing guidance and supports	Attach the following text to the action: "having due regard to the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations, and the need to not negatively impinge on any protected species."
B8	Partner with the Chamber of Commerce to encourage businesses to carry out energy efficiency upgrade works to their premises and to reduce their carbon emissions	Attach the following text to the action: "having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity, and the need to appropriately protect and conserve protected structures."
B9	Implement the Blue Green Infrastructure strategy for Limerick City and Environs whose aim is to inform and guide the planning and management of green and blue spaces in Limerick City and Environs, including our rivers, parks and open green spaces, helping drive the transition	Attach the following text to the action: "having due regard to opportunities to enhance tourism, recreation and cultural heritage value associated with routes, and environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites, and cultural heritage related sensitivities."



LACAP Action Reference	LACAP Action	Mitigation Measure
	to a low carbon and climate resilient society.	
B10	Implement the LSMATS Strategy was prepared by the NTA in collaboration with Limerick City and County Council. The strategy aims to deliver a transport system for the region, which will enable it to become an environmentally sustainable and unified metropolitan unit.	Attach the following text to the action: "use influence and control, as appropriate, to promote climate action co-benefits and development project conformance with planning and environmental protection requirements."
B11	Support the implementation of the Shannon Estuary Taskforce Plan sets out recommendations for the delivery of up to 30GW of Atlantic Offshore Wind through the Estuary by 2050, and measures to maximise the industrial development opportunities arising from this.	Attach the following text to the action: "whilst advocating and exerting influence to ensure supported projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects."
B16	Install maximum solar PV on appropriate LCCC owned corporate building.	Attach the following text to the action: "whilst having due regard to environmental sensitivities (European sites, biodiversity, glint and glare impacts built heritage)."
B17	Start retrofitting Council owned social housing to reduce carbon emissions as well as addressing fuel poverty	Attach the following text to the action: "having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity, and the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations."
B18	Make applications to Pathfinder. Pathfinder is a programme operated by SEAI. It provides finance to achieve substantial energy savings by bundling similar large-scale projects. Scale projects together. It is operated by SEAI.	Attach the following text to the action: "having due regard to environmental sensitivities such as biodiversity, European Sites and sensitive human receptors. "
C9	Utilise the facilities of the CIL and other programmes to encourage communities to form SECS	Attach the following text to the action: "Facilitate project adherence to planning and environmental protection requirements."
C12	Deliver Engagement programmes regarding funding opportunities and local development	Attach the following text to the action: "Facilitate project adherence to planning and environmental protection requirements."
N1	A local Biodiversity Action Plan will set out measures to protect and enhance local biodiversity, including climate-relevant measures. Implement relevant actions of the national Bio-diversity Action Plan at local level	Attach the following text to the action: "having due regard to co-benefit opportunities such the maintenance and improvement of water quality in line with the aims of the Water Framework Directive, or the potential for increasing carbon sequestration levels. "
N3	A wetland survey will inform council strategy and planning documents and implement recommendations in terms of conservation and restoration of wetlands.	Attach the following text to the action: having due regard to co-benefit opportunities such the maintenance and improvement of water quality in line with the aims of the Water Framework Directive, or the potential for increasing carbon sequestration levels.
N6	Deliver a habitat protection and creation of new habitats, landscapes, hedgerows strategy.	Reword the action as follows: "Deliver a habitat protection and creation of new habitats, landscapes, and native hedgerows strategy."



LACAP Action Reference	LACAP Action	Mitigation Measure
N11	Identify urban areas, towns and villages to be greened (tree planting, pollinators, community gardens, sensory gardens, allotments natural play areas)	Amend the text to the following: "Identify urban areas, towns, and villages to be greened (tree planting, pollinators, community gardens, sensory gardens, allotments natural play areas) <b>using native species.</b> "
N13	Investigate community tree planting and biodiversity enrichment programmes (Mini-Forest initiatives)	Attach the following text to the action: <b>"using native species."</b>
N16	Meet annual inspection targets as per EPA National Agriculture Inspection Plan	Attach the following text to the action : <b>"while ensuring sustainable transport modes are used to travel to and from inspection sites, where feasible."</b>
E1	Investigate the development of composting centres to promote circularity of green waste	Attach the following text to the action: <b>"having due regard to planning and environmental considerations and constraints."</b>
<b>Decarbonisation Zone Actions</b>		
Project	Description	Suggested Amendments
Historic building retrofit programme	Support the retrofitting of historic buildings through the development of new business models including the establishment of a sustainable investment fund	Attach the following text to the action: <b>"having appropriate regard to the need to protect and conserve the architectural or cultural heritage value that may be associated with such buildings, and protected species that may be present in such buildings."</b>
District Heating	Idea - Combined waste heat from local sources. Feasibility study required	Attach the following text to the action: <b>"Ensure such a report has appropriate regard to planning and environmental protection considerations."</b>
District Heating at Colbert Station	In conjunction with LDA development of the Colbert Quarter support the development of district heating on a community scale.	Attach the following text to the action: <b>"Promote - through control and influence as appropriate - development taking place in accordance with relevant planning and environmental protection requirements."</b>
River turbine	+City xChange project has developed a tidal turbine which has obtained planning permission	Attach the following text to the action: <b>"Ensure the project adheres to planning permission conditions relating to proper planning, sustainable development and environmental protection."</b>
Solar roof top	The potential for roof sharing should be examined	Attach the following text to the Action: <b>"Due regard shall be had to environmental sensitivities relevant to solar projects, including built heritage, visual impact and biodiversity related sensitivities."</b>
Freight management delivery and service strategy	This is a recommendation in LSMATS. The removal of heavy goods vehicles from the city centre would greatly improve air quality in the city centre	It is recommended that a feasibility study undertaken to ensure a net improvement to air quality through this action.
Behavioural Change/Active Travel/Travel planning for workplaces and schools	Active travel are continuing to develop and implement a range of initiatives in the areas of safe school, and cycling networks that connect the city	Attach the following text to the action: <b>"Ensure the active travel network is planned in a manner that has due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites and cultural heritage."</b>
Promote and Facilitate EVs	Develop an EV charging strategy for the city centre	Attach the following text to the action:



LACAP Action Reference	LACAP Action	Mitigation Measure
Car club - EVs	Support the roll out of EV car clubs and infrastructure in the DZ	"having due regard to ensuring disabled access to EV charging, and environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage."
LSMATS Park and Ride Hubs	Hubs at strategic locations outside city to reduce traffic coming into the city.	Attach the following text to the action: "Ensure such development promotes climate action co-benefits, including SuDS and nature based solutions, and does not contravene relevant environmental protection criteria or cause significant negative environmental effects."
Tree Planting	Tree planting offers the potential to address the heat island effect which will become more pronounced as global warming increases. There is potential to increase planting and greening across the city.	Ensure efforts are made to use native Irish trees to support local biodiversity.
Blue Green Infrastructure	The Blue Green Infrastructure delivers a vital role in addressing climate change (e.g. through surface water and flood management, storing greenhouse gases, providing habitats for wildlife) whilst providing a wide range of benefits and supports. The Limerick BGI Strategy presents a road map for its integration across the city and environs.	Attach the following text to the action: "having due regard to environmental sensitivities such as archaeology, European sites, biodiversity and amenity value, and the potential to enhance ecological connectivity"
City Flood Relief Scheme	City Flood Relief Scheme: The scheme will help protect the biodiversity of the Shannon Estuary	Attach the following text to the action: "having due regard to environmental sensitivities such as archaeology, European sites, biodiversity and amenity value, and the potential to enhance ecological connectivity"
Innovation area/R & D park	Give support to novel food R & D, including Vertical urban farming, Protein from fermentation	Give support to <b>sustainable</b> novel food R & D, including Vertical urban farming, Protein from fermentation



**Table 2-3: Proposed Environmental Mitigation Measures - Environmental Governance Principles included in the plan**

Promote climate action projects that support and maximize environmental co-benefits, such as biodiversity protection and enhancement; improved air, water or soil quality; or enhanced recreation, amenity and cultural heritage value, to ensure win-win benefits are gained.
Support or facilitate climate action related projects and initiatives which seek to make improvements in soil structure, management and health by increasing soil organic carbon - which will create the environmental co-benefits of improving flood resilience by enhancing water holding capacity of soils and increasing the level of GHG sequestration associated with land use functions.
Ensure all development underpinned or supported by climate action is planned and implemented in a manner that appropriately considers the potential for environmental co-benefits, potential environmental impacts and environmental protection requirements. No climate action related development project that is likely to have significant negative effects on the receiving environment shall be supported.
Flood projects, or related maintenance works, shall be carried out in a manner that promotes climate action-biodiversity related co-benefits, and shall have due regard for the protection and enhancement of rare, protected or important habitats and species.
Ensure climate action related projects are carried out in a manner that promotes climate action-cultural heritage co-benefits, and do not result in unauthorized physical damage to cultural, archaeological or architectural features, or unauthorized or inappropriate alteration of the context of sensitive cultural heritage features.
Promote the carrying out of climate action related projects underpinned by the plan in a manner that supports climate action water quality co-benefits, the achievement of Water Framework Directive objectives, and the protection and maintenance of physical habitat and hydrological processes/regimes.
Promote climate action projects that support protected trees, hedgerows and other habitats such as wetlands, flood zones which contribute to green infrastructure.
Support opportunities to improve ecological connectivity of non-designated habitats and sites to improve overall ecosystem resilience and functioning while supporting climate action within the county.
Ensure all projects supported by the council have taken the necessary precautions to identify and manage invasives species, particularly with regard to Schedule III species. No climate action related development project that is likely to cause the spread of invasives species listed in Schedule III shall be supported.

**2.2.3 Mitigation through consideration of development management standards/environmental protection objectives contained in the CDP**

In addition to the environmental mitigation measures integrated into the LACAP, the development management standards and environmental protection measures defined in the CDP will serve to mitigate the environmental effects of any development proposals supported by the LACAP. These development management standards/environmental protection measures have been defined for the express purpose of ensuring proper planning and sustainable development in the County. The CDP has been subject to its own SEA and AA. The LACAP has been prepared having appropriate regard to the policies and objectives contained in the County Development Plan.

**2.3 Appropriate Assessment**

The environmental assessment for the Plan undertaken was carried out in accordance with an Integrated Biodiversity Impact Assessment based methodology in accordance with EPA's guidance document entitled '*Final Report: Integrated Biodiversity Impact Assessment, Streamlining AA, SEA and EIA Processes. Best Practice Guidance.*' (2012).





The methodology employed facilitated the integration of SEA and Appropriate Assessment (AA) processes relating to biodiversity impact assessment to ensure the effective and streamlined assessment of biodiversity impacts. The plan-making, SEA and AA processes - including scoping, baseline evaluation, impact assessment and mitigation/monitoring measure development processes - were carried out concurrently to facilitate holistic and complete assessment of biodiversity impacts. The effective communication and integration of scientific knowledge and analysis between assessments took place. The SEA was suitably informed by the analysis and conclusions in AA.

## 2.4 Consultation on SEA Environmental Report

A draft version of the SEA Environmental Report accompanied a draft version of the LACAP on public display as part of the statutory public consultation required under Article 13 of S.I. No. 435/2004 - European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004. A draft version of the Natura Impact Report (NIR) produced under the AA process for the Draft LACAP also accompanied the Draft LACAP on public display. Environmental Authorities, relevant interested stakeholder and members of the public were notified of the Draft LACAP being placed on display and the opportunity to make consultation submissions in relation to the Draft LACAP. Members of public were made aware of the Draft LACAP and associated environmental reports through a notification published by the local authority on its website. Environmental Authorities and interested stakeholders were notified through notification correspondence.

Various parties made consultation submissions and observations on the Draft LACAP and associated environmental reports. Detail on submissions received relevant to SEA and AA issues and documentation, responses to these submissions, and any changes made to SEA Environmental Report (ER) and NIR documents on foot of these submissions, is provided in Table 2-4. Updates were made to the SEA and AA documentation where relevant following on from receipt and consideration of the consultation submissions.





**Table 2-4: Responses to Consultation Submissions**

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
Sea Fisheries coordination DAFM	Ireland's seafood industry (fishing and aquaculture) is one of the key stakeholders operating in the marine area and plays a vital role in the sustainability of our coastal communities. Over 15,000 people are employed around our coast both directly and indirectly. Many of these communities have very limited alternative employment and economic activity options. It is therefore essential that the socio-economic reliance on the seafood sector is fully recognised and is factored into any Climate Change Action plan. Fishing and food security is as key a part of Government Policy. Food Vision 2030 recognises and values the role of primary food producers.	Noted.	None.	None.
	The Seafood industry is experiencing a period of difficult change, arising from the ongoing consequences of the EU UK Trade and Co-operation agreement which are specific and impactful on Ireland's seafood sector. There is now ever-increasing demand on the marine space from Offshore Renewable Energy (ORE), Marine Spatial Planning, Marine Protected Areas (MPAs), and other environmental measures.	Noted.	None.	None.
	Our coastal communities and maritime sectors will continue to play a significant role in contributing to our climate goals and will continue to be consulted and supported in the transition to carbon neutrality. The seafood industry, through both the Sectoral Adaptation Plan (Agriculture, Forest and Seafood Climate Change Sectoral Adaptation Plan) and the annual Climate Action Plan (CAP23) continue to support initiatives to improve understanding of our marine area and ensure sustainable resource use, including through bio and circular economy initiatives. These plans require consideration in the SEA process.	The National Climate Action Plan (2023) and Sectoral Adaptation Plans have been considered in the SEA Process. The relationship of the Plan with other relevant Plans and Programmes has been defined in Appendix 1 of the SEA. Inter-plan cumulative effects have been evaluated in Section 7 of the SEA ER.	None.	None.
	Also for consideration in the SEA process is the European Commission's Communication on the energy transition of the fisheries and aquaculture sector as part of its Fisheries	This commentary was noted. Local authorities in Ireland do not have a direct remit over the fisheries and aquaculture sector. The actions defined in the Plan	Reference has been made to the European Commission's Communication on the	Reference has been made to the European Commission's



	<p>Policy Package. This proposes the establishment of an Energy Transition Partnership (ETP) to develop a roadmap for the energy transition of the sector towards climate neutrality by 2050. The roadmap will set out investment needs, sector initiatives and inform policy decisions to help achieve this transition. The ETP is a multi-stakeholder platform intended to promote co-operation, knowledge sharing and dialogue between private and public stakeholders in order to accelerate the energy transition in the fisheries and aquaculture sector. This Partnership will help to shape the development of future transitional actions for Ireland's seafood sector. Local authorities should include relevant steps to support a Just Transition for the sea fisheries and aquaculture sectors in their Climate Action Plans.</p>	<p>are however mutually symbiotic and harmonious with the vision and measures defined in European Commission's Communication on the energy transition of the fisheries and aquaculture sector. Insofar as the local authority's remit extends, the plan supports the protection and enhancement of the marine environment. The climate action defined in the plan has the potential to generate multiple climate action benefits, and co-benefits for the water and biodiversity environments and by extension the marine environment (i.e. biodiversity conservation and enhancement, coastal protection, water quality protection and improvements etc.).</p>	<p>energy transition of the fisheries and aquaculture sector in Section 3.4 - <i>In-combination effects with Other Plans and Programmes</i>, and Appendix 2 - <i>Relationship with other plans and programmes</i>, as appropriate.</p>	<p>Communication on the energy transition of the fisheries and aquaculture sector in Section 7.3 - <i>Potential Cumulative Effect of the LACAP in combination with other Plans and Projects</i>, and Appendix 1 - <i>Relationship of the Plan with other relevant Plans and Programmes</i>, as appropriate.</p>
Cian O'Mahony SEA Section Office of Radiation Protection and Environmental Monitoring Environmental Protection Agency	<p>The SEA should also assist in identifying ways to maximise the potential co-benefits of climate-related measures for air quality, human health, biodiversity, water quality and other interrelated areas (i.e. win-win solutions).</p>	<p>Noted and agreed. It was noted that the SEA Environmental Report (ER) has defined Environmental Governance Principles and action amendment suggestions to ensure climate action co-benefit opportunities are maximized. Various defined mitigation measures serve to promote win-win solutions.</p>	None.	None.
	<p>We recommend that the findings of the SEA ER and NIS are fully reflected in the Plan, to ensure that the relevant recommendations are fully considered and integrated as appropriate.</p>	<p>Noted and agreed. Environmental mitigation measures in the form of Environmental Governance Principles and climate action amendment suggestions have been fully integrated into the Plan itself.</p>	None.	None.
	<p><b>Environmental Authorities</b> Under the SEA Regulations, you should consult with:</p> <ul style="list-style-type: none"> <li>• Environmental Protection Agency;</li> <li>• Minister for Housing, Local Government and Heritage;</li> <li>• Minister for Environment, Climate and Communications;</li> <li>• Minister for Agriculture, Food and the Marine.</li> </ul> <p>If you have any queries or need further information in relation to this submission, please contact me directly at c.omahony@epa.ie. I would be grateful if you could send an email confirming receipt of this submission to: sea@epa.ie.</p>	<p>Noted. All listed Environmental Authorities have been consulted with as part of the SEA process. It was recommended the Council confirm receipt of this submission with Cian O' Mahony, if this was not done already.</p>	None.	None.



	<p><b>Non-Technical Summary</b>          You should ensure that the Non-Technical Summary includes the relevant information as required under Schedule 2 of S.I. No. 435 of 2004, as amended.</p>	<p>The requirements of Schedule 2 of SI No 435 were noted and amendments to the NTS have been made as appropriate.</p>	<p>None.</p>	<p>Updated the NTS to reflect the relevant information as required under Schedule 2 of SI No 435 of 2004 as amended.</p>
	<p><b>Relationship with other plans and programmes</b>          We acknowledge that the Plan has been prepared taking account of the key National plans including the National Climate Action Plan 2023. We also acknowledge that the Plan sets out the key plans, programmes and policies considered in preparing the SEA.          The Plan should include a commitment to remain aligned with high level plans and programmes, Guidelines, and legislation over its lifetime. The Climate Action Plan 2024 is currently being prepared and work will be commencing on the review of the National Planning Framework and Regional Spatial and Economic Strategies also. Any relevant updates of these plans/strategies should be integrated as appropriate into the Plan as relevant and appropriate.          The Plan should include a commitment to consider any relevant updated actions, measures or recommendations that may arise in updates to the National Climate Action Plan (or the National Planning Framework) over the lifetime of the Plan.</p>	<p>Noted and agreed. It was noted that this was in reference to the LACAP and not the SEA ER or AA NIR documentation.          It was recommended the Council includes a commitment in the Plan to remain aligned with high level plans and programmes if this was not done already.          It was recommended the Council include a commitment in the Plan to consider and appropriately integrate relevant updates to the national Climate Action Plan and National Planning Framework over the lifetime of the Plan.</p>	<p>None.</p>	<p>None.</p>
	<p><b>Strategic Environmental Objectives</b>          We recommend that in considering strategic environmental objectives, they should where possible reflect the plan being prepared, rather than use more generic environmental objectives. This will help both in considering more specific monitoring and mitigation measures, when required.</p>	<p>Noted. The Strategic Environmental Objectives defined have been very specifically defined to reflect the themes, goals, objectives and climate action contained in the plan and in light of the potential environmental effects associated with Plan implementation.</p>	<p>None.</p>	<p>None.</p>
	<p><b>Alternatives</b>          We note the alternatives considered in the SEA and acknowledge the preferred option selected.</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>
	<p><b>Mitigation Measures</b>          Where the potential for likely significant effects has been identified, you should provide appropriate mitigation</p>	<p>The SEA produced recommended a suite of mitigation measures in response to climate actions considered to have potentially significant environmental effects.</p>	<p>None.</p>	<p>None.</p>



	<p>measures to avoid or minimise these. You should also ensure that the Plan includes clear commitments to implement the relevant mitigation measures.</p>	<p>Environmental Governance Principles have been defined for the purpose of underpinning and framing the defined climate actions. All activities and development supported by the defined climate actions shall be undertaken or influenced by the local authority, as appropriate, in accordance with these Environmental Governance Principles.</p> <p>Mitigation has also been achieved by the integration of environmental considerations into the defined LACAP climate actions.</p> <p>These mitigation measures have been wholly integrated into the LACAPs.</p> <p>Section 8 of the SEA ER provides full detail of these environmental mitigation measures.</p> <p>It was recommended the Plan provide a clear commitment to implement these mitigation measures, if this was not done already.</p>		
	<p><b>Monitoring, Implementation &amp; Reporting</b></p> <p>The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities</p> <p>If the monitoring identifies adverse impacts during the implementation of the Plan, then you should ensure that suitable and effective remedial action is taken.</p> <p>Guidance on SEA-related monitoring is available on the EPA website at <a href="#">06695-EPA-SEA-Statements-and-Monitoring-Report.pdf</a></p>	<p>The SEA Monitoring Programme established for the LACAP is contained in the SEA ER. This monitoring programme has been developed in accordance with EPA guidelines entitled 'Guidance on SEA Statements and Monitoring' (2020).</p> <p>The monitoring programme is multi-faceted, broad in scope and has been designed to allow for a flexible and adaptive approach to SEA monitoring during Plan implementation.</p> <p>The monitoring programme has been designed to inherently measure cumulative effects that may arise due to the implementation of the Plan.</p> <p>This plan considers both positive and negative effects, as per the following statement from the SEA text:</p> <p><i>'Where monitoring identifies that the implementation of the LACAP is having a significant negative environmental effect, an in-depth review of the LACAP should take place and the LACAP should be updated in a manner that satisfactorily mitigates these environmental effects (i.e., through the adoption of</i></p>	<p>None.</p>	<p>Updated the SEA monitoring programme to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects arising due to plan implementation.</p> <p>Provided additional detail on monitoring programme data sources.</p>



		<p><i>additional environmental mitigation measures.). Similarly, where monitoring indicates that potential positive environmental effects associated with LACAP implementation are not being adequately realized, the LACAP should be reviewed and updated in a manner that supports the realization of all potential positive environmental effects, having regard to the overall vision and high-level objectives of the plan.'</i></p> <p>It was noted however that additional opportunities exist in relation to monitoring the positive environmental effects of defined climate action – in connection with SEOs PHH1, L1, AQN2, TR1. The SEA monitoring programme has been updated to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects arising due to plan implementation.</p> <p>The monitoring programme includes detail on the indicators, targets and data sources to be used to monitor and measure progress. Some additional detail on data sources has however been provided to better guide the SEA monitoring to be carried out across plan implementation.</p> <p>A commitment to remedial action in the event SEA monitoring shows the implementation of the Plan is having adverse environmental effects has been made in the SEA.</p>		
	<p><b>EPA State of the Environment Report</b></p> <p>Our State of Environment Report, Ireland's Environment - An Integrated Assessment 2020 (SOER2020) identifies thirteen 'Key Messages for Ireland'.</p> <p>Delivering Ireland's long-term sustainable development and environmental objectives will involve many different stakeholders to address these key actions. The report recognises the need for full implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies.</p>	<p>Noted.</p> <p>It was recommended the Council make a commitment to take account of any relevant recommendations in the SOER 2024 report, once published, in implementing the Plan over its lifetime.</p>	<p>None.</p>	<p>None.</p>



	<p>The EPA are currently preparing the next iteration of the SOER report, which will be published in 2024. We recommend that a commitment is made in the Plan, to take account of any relevant recommendations in the SOER 2024 report, once published, in implementing the Plan over its lifetime.</p>			
	<p><b>SEA Statement – “Information on the Decision”</b>        Once the Plan is adopted, you should prepare an SEA Statement that summarises:</p> <ul style="list-style-type: none"> <li>• How environmental considerations have been integrated into the Plan;</li> <li>• How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;</li> <li>• The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,</li> <li>• The measures decided upon to monitor the significant environmental effects of implementation of the Plan.</li> </ul> <p>You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.</p>	<p>Noted. An SEA statement has been produced and circulated to any environmental authority consulted during the SEA process.</p>	<p>None.</p>	<p>None.</p>
	<p><b>Future Amendments to the Plan</b>        You should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>



<p>Kerry County Council (excerpts relevant to SEA and AA)</p>	<p>Finally, it is noted that Limerick City and County Council has determined that the LACAP requires a SEA and AA.</p> <p>The Limerick LACAP is accompanied by a SEA Environmental Report and a Natura Impact Report (NIR).</p> <p>It is noted both reports have assessed the Limerick LACAP for likely significant effects on the environment and the potential for adverse effects on the integrity of European Sites. This includes an assessment further to other plans and programmes, such as those of adjoining Local Authorities, including KCC LACAP. The mitigation measures from both the SEA ER and NIR are noted and the integration of same into Limerick's LACAP. Similarly, KCC has also undertaken a SEA and prepared a NIR. As you are probably aware, Kerry's Draft LACAP 2024-2029 public consultation phase has now concluded, and we have moved to the next phase of the plan making process.</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>
<p>DAFM</p>	<p>The national Climate Action Plan contains a number of actions that will reduce GHG emissions, however there will also be significant benefit to biodiversity and enhance adaptation.</p> <p>In relation to adaptation and the potential effects of climate change on Agriculture, there are a number of measures that can be applied to build resilience, many of which can also have benefits from a mitigation perspective. Maintaining a fodder reserve on farm can address the effects of longer and wetter winters as well as poorer weather conditions in spring at the start of the grazing season. The Teagasc advisory service and private Agricultural Consultants are available to provide the appropriate advice to farmers. Diversification in agricultural systems will increase resilience of farms to climate change and reduce the economic risk. Changes in climate can encourage an increase in exotic pests and diseases including invasive species - which would have a negative impact on biodiversity if measures to promote resilience are not put in place. Equally, warmer and wetter climatic conditions encourage increased disease pressure in livestock, for instance an increased prevalence of liver fluke.</p>	<p>Noted. It was recommended that the local authority have further regard to the comments made in this consultation submission.</p>	<p>None.</p>	<p>None.</p>



	<p>Creating further resources to harbour and restore biodiversity improve resilience to climate change. The planting of trees and forestry can contribute to carbon sequestration, and biodiversity by providing a more diverse ecosystem to build resilience. Improvements in soil structure, management and health by increasing soil organic carbon will enhance water holding capacity beneficial for drought conditions as well as high rainfall events. Peatland restoration will also improve water holding capacity as well as water quality.</p> <p>As Local Authorities continue to finalise their 5 year Climate Action Plans, DAFM would request that the above policies, strategies and measures be taken into consideration to ensure that Ireland's reduction targets for agriculture and land use are fully supported. DAFM remains available to support Local Authorities in the development of their CAPs and other agriculture related items.</p>			
Cork County Council	<p>We would welcome further consultation in relation to the mitigation measures and adaptation measures proposed to be adopted in Cork County Council's Climate Action Plan.</p> <p>We note that Limerick City &amp; County Council's Draft Climate Action Plan is accompanied by a Strategic Environmental Assessment Environmental Report and Appropriate Assessment Natura Impact Report and note the conclusions reached therein.</p>	Noted.	None.	None.
N/M 20 Cork to Limerick Project	<p>A key aim of the project is to ensure it supports the mobility needs of society in a manner that is the least damaging to the environment and does not impair the mobility needs of future generations. The project will support decarbonisation of the transport network (inclusive of electrification of vehicle fleet), foster intermodality of transport use, improve air quality and reduce noise emissions in towns and villages with key health, quality of life and placemaking benefits. It will enable local opportunities for walking and cycling activity in communities with reduced traffic levels from the scheme. Environmental considerations are actively being integrated into the project planning and design through the Environmental Impact Assessment process.</p>	Noted.	None.	None.





<p>Inland Fisheries Ireland (IFI)</p>	<p>Protection of aquatic ecosystems requires that river systems be protected on a catchment basis. The Climate Action Plan (CAP) must recognise that protection of the aquatic environment/habitat not only requires the protection of water quality but also necessitates the protection and maintenance of physical habitat and hydrological processes/regimes.</p>	<p>Noted. It was noted that any significant environmental effects of the CAP have been identified and mitigated against through the SEA and AA processes. The cumulative effects and inter-relationships between environmental components have been considered in this manner. Nonetheless, it was recommended that the local authority consider this comment, as appropriate.</p>	<p>None.</p>	<p>None.</p>
	<p>IFI encourages the use of soft engineering solutions are the way to sensitively increase flood reliance in a river system. Nature based solutions can involve approaches such as bank protection using tree logs, natural water retention and restoring natural river processes. Encouraging meanders in rivers will improve local flow conditions and slows water during high flow conditions.</p>	<p>The Plan promotes the use of Nature Based Solutions and Sustainable Drainage Systems as ways to promote flood resilience. It was recommended the local authority have further regard to these comments during plan implementation.</p>	<p>None.</p>	<p>None.</p>
	<p>IFI also encourage the idea of self-rehabilitation of a river system by being "left alone". By ceasing activities such as channel maintenance, this allows time for the river processes of erosion and deposition to normalise. Daylighting/deculting of waterbodies within the county is also considered a natural method of flood management which IFI would fully support. Council commitment to reject proposals that would interfere with natural floodplains would greatly benefit both aquatic and riparian features in the surrounding areas.</p>	<p>Environmental protection considerations have been appropriately integrated into flood resilience related action defined within the plan. Climate action defined in the Plan supports the protection and enhancement of biodiversity, including riparian buffer zones and aquatic habitat. It was recommended the local authority have further regard to these comments during plan implementation.</p>	<p>None.</p>	<p>None.</p>
	<p>Nature-based solutions should be considered from the beginning of the development planning process. Nature Based SuDS work with nature (rather than trying to control it) and are now being mainstreamed across the globe. The benefits of taking a nature-based approach includes not just flood risk management benefits, but also improved water quality, biodiversity and climate adaptation and mitigation. In terms of surface water runoff, it is always best to deal with pollutants as close to the source as possible, rather than transferring the pollution elsewhere.  Nature-based solutions allows polluted runoff be treated close to where the rain falls and can improve the quality of surface water runoff and decrease runoff volumes.</p>	<p>The Plan promotes the use of Nature Based Solutions and Sustainable Drainage Systems as ways to promote flood resilience. It was recommended the local authority have further regard to these comments during plan implementation.</p>	<p>None.</p>	<p>None.</p>



	<p>They can also help combat the adverse effects of climate change by reducing temperatures at street level in urban areas and reducing volumes of rainfall-runoff which can aid to alleviate flooding issues. The Department of Housing, local Government and Heritage have recently published the following interim guidance document on Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document, which should be considered when designing drainage systems. It discusses Water Sensitive Urban Design (WSUD), which is an approach to design that delivers greater harmony between the water cycle, the environment, and communities. IFI should be consulted when resolving local flooding issues incorporating Nature Based Solutions. The CAP should include incentives and policies to enhance the uptake of Nature Based Solutions in new private developments. The multifunctional asset value of Nature Based Solutions should be laid out and the extent of the benefits provided be quantified to encourage the use.</p>			
	<p>One of the stated main objectives of the CAP is to climate proof council infrastructure. Road Drainage should ensure adequate attenuation measures are in place and silt and petrol interceptors, constructed wetlands and swales should be employed where appropriate to reduce pollutants from the road entering watercourses. However, these systems only work when they are properly maintained into the future. IFI encourages a commitment by Limerick City and County Council that all roads and pipelines are constructed in such a manner so as not to pose a threat to surface waters either through pollution, loss of fisheries habitat or through interference with the passage of migratory fish species and/or spawning beds. The impacts of poorly designed river/stream crossing structures can be serious in terms of habitat loss. Prevention of the free upstream migration of fish species such as Salmon, Trout and Lamprey effectively results in the loss of spawning habitat upstream of the barrier to migration. This could have serious implications for the populations of fish species concerned and contravenes the legal obligation under the WFD to protect the ecological status of river catchments and channels. When structures</p>	<p>At policy level, the Plan supports the protection of the water environment from development and activities supported by defined climate action.</p> <p>Several Environmental Governance Principles have been defined in the Plan which promote environmental protection and enhancement, including biodiversity conservation and water quality protection and improvement.</p> <p>Environmental protection considerations have been appropriately integrated into transport, flood and drainage related development and infrastructure maintenance related action defined in the Plan.</p> <p>It was recommended the local authority have further regard to these comments during plan implementation.</p>	None.	None.



	<p>are being designed for crossing fisheries waters, consideration must be given to the following biological criteria: species of fish required to safely pass; size of fish required to pass (life stage); time of year in which fish passage is required; and, high and low design passage flows etc. Bridges and bottomless culverts have the least impact on fish passage. IFI recommends that the CAP should include a clear policy on the use of clear span structures on fisheries waters and that IFI should be consulted on any such proposed developments.</p>			
	<p>There is a zone of influence associated with Greenways/Blueways and these must be considered and planned for in the CAP when promoting active travel.</p>	<p>The Plan supports the protection and enhancement of the biodiversity and water environments from development and activities supported by defined climate action.</p> <p>Several Environmental Governance Principles have been defined in the Plan which promote environmental protection and enhancement, including biodiversity conservation and water quality protection and improvement.</p> <p>Environmental protection considerations have been appropriately integrated into Green Infrastructure development related action defined in the Plan.</p> <p>The Plan promotes the use of Nature Based Solutions and Sustainable Drainage Systems as ways to promote flood resilience.</p> <p>It was noted that SEA Monitoring Framework for the LACAP includes the following Plan target:</p> <ul style="list-style-type: none"> <li>• Increase linear metres of riparian corridor enhanced with native planting.</li> </ul> <p>It was recommended the local authority have further regard to these comments during plan implementation.</p> <p>As a general note, it was recommended the local authority have appropriate regard to all commentary received from IFI when designing, planning for and delivering site specific projects.</p>	<p>None.</p>	<p>None.</p>



	<p>A wildlife corridor system that protects regional diversity should be at the forefront of the Greenway/Blueway planning processes. Fragmentation can occur along riparian corridors if proper planning is not in place. In considering wildlife, the focus should not be solely on the narrow width of the path of the greenway, consider the wider area it may influence such as allowing invasive plant and animal species to spread more easily along the corridor and outcompeting native species.</p>	<p>The Plan supports the protection and enhancement of the biodiversity and water environments from development and activities supported by defined climate action.</p> <p>Several Environmental Governance Principles have been defined in the Plan which promote environmental protection and enhancement, including biodiversity conservation and water quality protection and improvement.</p> <p>Environmental protection considerations have been appropriately integrated into Green Infrastructure development related action defined in the Plan.</p> <p>The Plan promotes the use of Nature Based Solutions and Sustainable Drainage Systems as ways to promote flood resilience.</p> <p>It was recommended the local authority have further regard to these comments during plan implementation.</p>	None.	None.
The Department of Housing, Local Government and Heritage	<p><b>Archaeology and Built Heritage</b></p> <p>The Department of Housing, Local Government and Heritage welcomes the publication of local authority draft Climate Change Adaptation Strategy. The Department draws your attention to the <b>Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019)</b> prepared as part of the National Adaptation Framework. The Climate Change Sectoral Adaptation Plan (CCSAP) identifies the priority impacts for the built and archaeological heritage based on current climate change projections.</p>	Noted.	Reference was made to the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) in Section 3.4 - <i>In-combination effects with Other Plans and Programmes</i> , and Appendix 2 - <i>Relationship with other plans and programmes</i> , as appropriate.	Reference was made to the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) in Section 7.3 - <i>Potential Cumulative Effect of the LACAP in combination with other Plans and Projects</i> , and Appendix 1 - <i>Relationship of the Plan with other relevant Plans and Programmes</i> , as appropriate.
	<p>The Heritage Division of the Department (National Monuments Service and National Built Heritage Service) is engaged with the local authorities through the departmental Climate Change Advisory Group and established Working Groups to ensure a consistent approach to protection and adaptation of heritage assets across the country and an</p>	Noted.	None.	None.



	alignment of policies, plans and actions across national, regional and local climate action. The Department anticipates ongoing engagement with the local authorities throughout the implementation of current and future sectoral adaptation plans.			
	In the preparation and implementation of the local authority adaptation strategy, there are a number of issues regarding protection of built and archaeological heritage that the Department recommends be taken into account to identify the heritage assets at risk in its area, assess their vulnerability to climate change, increase their resilience and develop disaster risk reduction policies for direct and indirect risks. For example, it is recommended that the strategies should consider:	Noted.	None.	None.
	<ul style="list-style-type: none"> <li>Identifying the built and archaeological heritage assets in the local authority area including, but not restricted to, structures and sites subject to statutory protection under the National Monuments Acts 1930 to 2014, or the Planning and Development Acts.</li> </ul>	The SEA scoping report and SEA Environmental Report identify the built and archaeological heritage assets in the LA including structures and sites subject to statutory protection under the National Monuments Acts 1930 to 2014, and the Planning and Development Act (as amended). Exhaustive detail on built and archaeological heritage is held on record by the local authority and provided in the Country Development Plan already.	None.	None.
	<ul style="list-style-type: none"> <li>Including objectives to carry out climate change risk assessments, including condition assessments, for the historic structures and sites in its area</li> </ul>	Noted. It was recommended the local authority have further regard to these comments.	None.	None.
	<ul style="list-style-type: none"> <li>Including objectives to develop disaster-risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area</li> </ul>	Noted. The Plan defines actions that will serve to minimize and manage climate related disaster risk (e.g., flood risk) and improve the climate resilience of architectural and archaeological heritage.	None.	None.
	<ul style="list-style-type: none"> <li>Including objectives to develop resilience and adaptation strategies for the built and archaeological heritage in its area.</li> </ul>	Noted. The Plan defines actions that will improve the climate resilience of architectural and archaeological heritage.	None.	None.
	<ul style="list-style-type: none"> <li>Developing the skills capacity within the local authority to address adaptation/mitigation/emergency management</li> </ul>	Noted. It was recommended that the local authority consider this as appropriate.	None.	None.



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



## 2.5 SEA and Plan Modifications

LCCC prepared a Chief Executive (CE) Report responding to consultation submissions from Environmental Authorities, interested stakeholders and members of the public.

The CE Report recommended Plan modifications in light of the consultations submissions received in relation to the Plan and associated environmental reports and subsequent consideration of these submissions. The CE Report was appropriately informed by recommendations made by the SEA (and AA) team on foot of their review of consultation submissions relating to SEA (and AA) issues and documentation. Recommendations were taken on board by the plan-making team as appropriate.

Plan modifications made were screened for SEA and AA. All Plan modifications made during the plan-making process were determined to be non-material and did not introduce any additional environmental effects not previously considered and mitigated during the SEA and AA processes.

An earlier draft version of the SEA Environmental Report was finalized having appropriate regard to the consultation submissions made during the SEA consultation period, recommendations made in the CE Report on consultation submissions, and the modifications made to the original draft version of the LACAP that was put on display for consultation. The updates made to the report were clerical or minor and non-material in nature and did not materially change the parameters of the environmental assessment undertaken or the environmental mitigation defined.

The CE Report on consultation submissions received on the Plan and associated environmental reports accompany the adopted Plan and this SEA Statement and provides exact detail on how consultation submissions were considered by the local authority during the plan-making process. This CE Report also documents the Plan modifications made by the local authority following its consideration of consultation submissions relating to both the content, focus and goals of the Plan and the environmental assessment of the Plan presented in the associated SEA and AA documentation. All Plan modifications are presented in Table 2-5. No modifications affecting the SEA and AA processes were made upon Plan Adoption.

**Table 2-5: Plan Modifications**

Action	Summary of Modification
n/a	The text in Section 4.2.5.1, has been amended to include the text 'Green Hydrogen' and 'including Bio Compressed Natural Gas': To support an increase in renewable energy sources across the county LCCC will prepare a Renewable Energy Strategy for the county that will include wind, solar, integrated renewables as well as District Heating, <b>Green Hydrogen</b> and Anaerobic Digestion <b>including Bio Compressed Natural Gas</b> .
n/a	The following sentence has been added to Section 4.6 after the text 'National Waste Management Plan for a Circular Economy 2023-2029': <b>Regard will also be had to "Irelands Draft National Biomethane Strategy Jan 2024."</b>
n/a	The following sentence has been added to Section 6.1 after the text '...greatly support the delivery of this plan.': <b>Limerick City and County Council will continue to review the plan to ensure it is fully aligned to relevant national strategies and guidelines.</b>
n/a	The following sentence has been added to Section 6.3.4. <b>Ensure that the mitigation measures outlined in Section 8 of the SEA Environmental Report are implemented in the course of implementing this plan.</b>
n/a	In Section 4.3.1, the text 'Figure xxx' has been replaced with 'Figure 4.2'.



Action	Summary of Modification
n/a	In Section 4.7.1, the text 'Figure xx' has been replaced with 'Figure 4.5'.
n/a	In Section 5.3, Figure 5.1 has been amended to include the full extent of the LDA masterplan.
n/a	The following sentence has been added to Section 4.2.3 after the text '...to accelerate the programme of social housing retrofitting.': <b>LCCC ambition is to upgrade its social housing stock to A3 over the lifetime of this plan.</b>
n/a	The following sentence has been added to Section 4.3 after the text '...air and noise pollution in our towns, villages and cities.': <b>This plan seeks to reduce the modal split of cars by 50% over the lifetime of the plan.</b>
n/a	The following sentence has been added to Section 6.3.2 after the text '...established tracking measures, to the Climate Action Steering Group.': <b>These will be reported in the CE Monthly Report.</b>





## 3. CONSIDERATION OF ALTERNATIVES

### 3.1 Introduction

Article 5(1) of the SEA Directive states that: *'Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.'*

The SEA Directive requires that reasonable alternative means of achieving the strategic goals of the LACAP (taking into account the objectives and the geographical scope of a plan or programme) are identified, described and evaluated for their likely significant effects on the environment. Such reasonable alternative must be realistic and capable of implementation.

Reasonable alternatives to the LACAP were initially explored and examined during the SEA Scoping stage of the SEA process, having regard to the scope, function and strategic aims and main objectives of the LACAP, as defined in the Local Authority Climate Action Plan. This process facilitated the accurate identification of reasonable alternatives to the LACAP and also suitably informed the plan-making process, ensuring optimal environmental outcomes.

Reasonable alternatives were assessed against the Strategic Environmental Objectives (SEOs) established for the aspects of the baseline environment which are likely to be significantly affected by the LACAP.

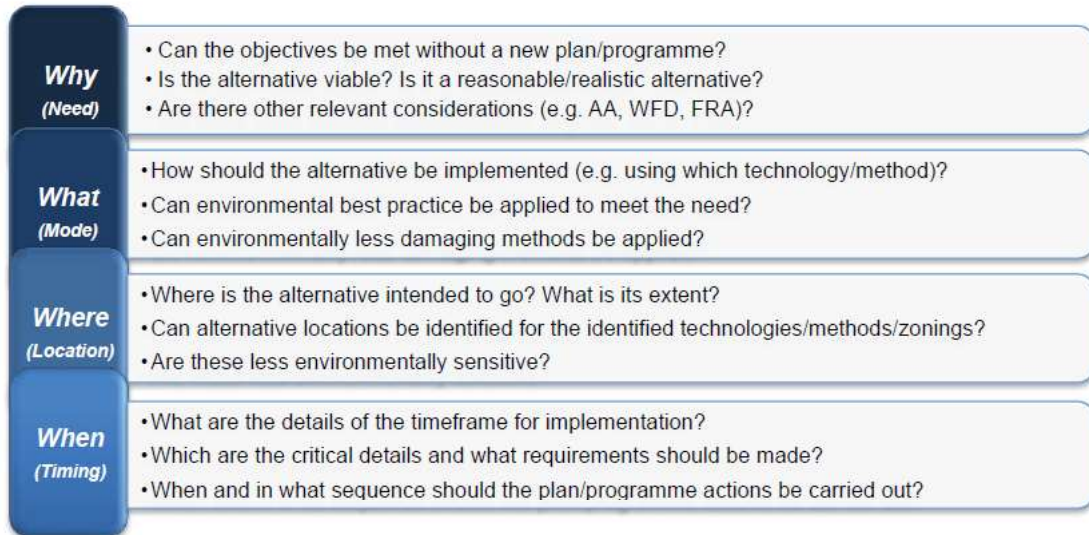
### 3.2 Approach to Developing Reasonable Alternatives

A range of alternatives to the LACAP were considered during the plan-making process. The approach for identifying reasonable alternatives to the LACAP is defined below:

1. Iterative communication was held between the plan-making and environmental assessment teams to identify the various alternative approaches and options being considered to achieve the vision of the plan - the reduction of GHG emissions at Local Authority organizational level and within the Community in support of Climate Action policy. This communication commenced early on during the plan-making process.
2. Reasonable alternatives considered were identified. For an alternative to be considered reasonable, it must be practical/functional, realistic and implementable. An evaluation of whether each alternative was practical/functional, reasonable and implementable took place. This evaluation considered the following factors:
  - 2.1. The vision of high-level objectives of the LACAP.
  - 2.2. The geographic scope of the LACAP.
  - 2.3. The actual powers and functions of the Local Authority.
  - 2.4. The climate action merits of the alternative.
  - 2.5. The genuine ability of the alternative to achieve the plan vision and high-level objectives.
  - 2.6. The technical feasibility of the alternative.
  - 2.7. The availability of resources, including financial resources to deliver the plan within the required timeframe.
  - 2.8. The policy hierarchy and the parameters placed around the LACAP by higher-level policy.
  - 2.9. The legislative context and the parameters placed around the LACAP by climate action and environmental related legislation.



The toolkit contained in the EPA's guidelines entitled 'Developing and Assessing Alternatives in Strategic Environmental Assessment Good Practice Guidance' (2015) was utilized when identifying reasonable alternatives. The 'Why? What? Where? When?' Model defined in the guidelines were used when framing reasonable alternatives, as shown in Figure 3-1.



**Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3 Developing and Assessing Alternatives in the Strategic Environmental Assessment Process (EPA, 2015).**

### 3.3 Identification and Description of Reasonable Alternatives

Reasonable alternatives to the LACAP were identified. A description of these reasonable alternatives and the reasons for selecting these reasonable alternatives are presented in Table 3-1.

A 'Do Nothing' or 'Do Minimum' alternative was not a reasonable alternative in this instance as the preparation of an effective LACAP is a statutory requirement under Section 16 of the Climate Act.



**Table 3-1: Reasonable Alternatives to the LACAP**

Reasonable Alternative	Description of Reasonable Alternative	Reasoning for selecting this Reasonable Alternative
<p>Alternative 1 - The Pareto Approach: Prioritize reducing GHG emissions from largest GHG emitting sectors to mitigate against climate change impacts.</p>	<p>This alternative involved developing a LACAP that primarily focusses on climate mitigation and reducing GHG emissions associated with the largest GHG emitting sectors in the County that a local authority can reasonable influence having regard to the functions of a local authority - the Residential and Transport sectors.</p>	<p>This was a viable alternative that could achieve a significant reduction in GHG emissions by prioritizing and supporting climate mitigation related action for the Residential and Transport sectors. The alternative would cover the period from 2024 to 2029 (the duration of the prospective LACAP).</p>
<p>Alternative 2 - The Holistic Approach: Adopt a multi-pronged approach and focus on a range of priority areas to mitigate against and adapt to climate change impacts.</p>	<p>This alternative involved developing a LACAP that has a balanced focus on both climate mitigation and adaptation across several theme areas and all socio-economic sectors.</p>	<p>This was a viable alternative that would have enhanced potential to reduce GHG emissions across multiple sectors, potential to offset GHG emissions, and greater potential to protect the local community and the environment from climate change related risks. Climate mitigation and adaptation actions across a wide breath of theme areas would be supported by the LACAP. The alternative would cover the period from 2024 to 2029 (the duration of the prospective LACAP).</p>
<p>Alternative 3 - The Holistic and Participatory Approach (Current LACAP): Adopt a multi-pronged approach - that has a strong community engagement emphasis - and focus on a range of priority areas to mitigate against and adapt to climate change impacts.</p>	<p>This alternative involved developing a LACAP that has a balanced focus on both climate mitigation and adaptation across several theme areas and all socio-economic sectors, and which has a strong community engagement emphasis, which underpins, supports and drives the climate action contained in the plan.</p>	<p>This was a viable alternative that would have enhanced potential to reduce GHG emissions across multiple sectors, potential to offset GHG emissions, and greater potential to protect the local community and the environment from climate change related risks. Climate mitigation and adaptation actions across a wide breath of theme areas would be supported by the LACAP. The range of climate mitigation and adaptation actions defined in the LACAP is likely to have better community level and organizational support given its strong community engagement emphasis. The alternative would cover the period from 2024 to 2029 (the duration of the prospective LACAP).</p>



### 3.4 Evaluation of Reasonable Alternatives and Reasons for Choosing the Preferred Plan

An evaluation of the potential effects of the reasonable alternatives on the baseline environment was carried out in accordance with the SEA Directive and best practice guidelines. This evaluation is documented in the SEA Environmental Report for the LACAP. A summary of this evaluation and the reason for choosing the preferred Plan is presented below.

Alternative 1 - The Pareto Approach - would of lead to some positive environmental effects and would of resulted in the reduction of GHG emissions in the sectors that the local authority can control or exert substantial influence on that contribute most in terms of GHG emission in the County - the Residential and Transport sectors. It is less likely that this alternative would have delivered the wide-ranging climate mitigation and offsetting related action required to fully realize GHG emission reduction potential in the County. It is also less likely this alternative would have defined a wide range of climate adaptation measures that would fully protect biodiversity, heritage resources, environmental receptors and people from climate change risks. This alternative approach may have generated several negative environmental effects, which would not be counterbalanced by the positive environmental effects associated with Alternatives 2 and 3.

Alternative 2 - The Holistic Approach - and Alternative 3 - The Holistic and Participatory Approach - would have both broadly delivered suitably wide ranging and effective climate action. These alternatives have the potential to generate multiple positive environmental effects, including a reduction in GHG emissions at organizational, community and sectoral levels, in addition to a variety of other environmental benefits. These alternatives would have placed a balanced emphasis on both climate mitigation and adaptation action, ensuring climate change related environmental risks are adequately understood and managed at community level.

Alternative 3 had the best potential to deliver effective climate action given its holistic, wide encompassing nature; and given its strong community engagement emphasis, which supports better participation in climate action at community level. Alternative 3 had better potential therefore to fully realize potential environmental effects than Alternative 2.

**Reasonable Alternative 3 - The Holistic and Participatory Approach - therefore constituted the preferred alternative or preferred plan.**



## 4. SEA CONCLUSION

The reasonable alternative evaluation presented in the preceding section resulted in the development of a LACAP that achieves the best environmental outcomes in comparison to other reasonable alternative considered.

The adoption of the mitigation measures to be integrated into the LACAP, in combination with the continued adoption of the development planning and control related environmental protection measures defined in the CDP will prevent, reduce and as fully as possible offset any potential negative environmental effects due to the implementation of the LACAP. No further mitigation measures are required for the LACAP.

With the adoption of the defined mitigation measures, the implementation of the adopted LACAP will not result in any likely, significant, adverse environmental effects.



## 5. SEA MONITORING

The SEA Directive requires that the environmental effects of the implementation of a plan are monitored in order 'to identify at an early stage unforeseen effects, and to be able to undertake appropriate remedial action.'

A series of indicators and targets were established for identified SEOs to enable ongoing monitoring and measurement of LACAP implementation performance, the environmental effects of the implementation of the LACAP and the efficacy of environmental mitigation measures. Such monitoring will be carried out regularly to support plan implementation.

SEO indicators are simple and effective quantifiable indicators used to measure the environmental effects of implementing the LACAP and the progress of SEO objectives and targets. SEO targets set focussed, measurable aims and thresholds that the LACAP can support the achievement of.

LCCC are responsible for implementation of the SEA monitoring programme. The environmental effects (including positive, negative and cumulative effects) of LACAP implementation will be monitored once every year over the course of the plan's five-year lifetime. This monitoring will be carried out by the Environment section of Limerick City and County Council who will report on progress and performance to the relevant SPC annually. A monitoring report will be prepared to document monitoring outcomes. This report shall be made available for public inspection.

Where monitoring identifies that the implementation of the LACAP is having a significant negative environmental effect, an in-depth review of the LACAP should take place and the LACAP should be updated in a manner that satisfactorily mitigates these environmental effects (i.e., through the adoption of additional environmental mitigation measures.). Similarly, where monitoring indicates that potential positive environmental effects associated with LACAP implementation are not being adequately realized, the LACAP should be reviewed and updated in a manner that supports the realization of all potential positive environmental effects, having regard to the overall vision and high-level objectives of the plan.

The SEA Monitoring Programme established for the LACAP is contained in Table 5-1. This monitoring programme has been developed in accordance with EPA guidelines entitled 'Guidance on SEA Statements and Monitoring' (2020). The monitoring programme includes detail on the indicators, targets and data sources used to monitor and measure progress.

A stand-alone monitoring report on the significant environmental effects of the implementation of the Plan will be prepared in advance of the plan review process. The Council is responsible for the ongoing review of indicators and targets, collating existing relevant monitored data, the preparation of monitoring evaluation report(s), the publication of these reports and, if necessary, the carrying out of remedial action.



Table 5-1: SEA Monitoring Programme

Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
Overall	O1	Ensure, where appropriate, that lower-level plans and projects contribute to overall environmental monitoring processes within the County.	Lower-level plan and project accordance with the plan.	Require all lower-level plans and projects have appropriate regard to and appropriately support all action and development proposals defined in the Plan. Ensure planning policy and climate action policy is aligned.	Review of Local Area Plans. Internal monitoring of likely significant environmental effects of development projects. Review of lower-level plan SEA documentation.
Population & Human Health	PHH1	Avoid or minimise impacts to population and human health.	Number of spatial concentrations of health problems arising from environmental factors as a result of implementing the Plan.	No spatial concentrations of health problems arising from environmental factors as a result of implementing the Plan.	Consultation with the Health Service Executive (HSE)/Health Atlas Ireland and the EPA.
	PHH2	Ensure the Decarbonising Zone avoids and minimises impacts to the existing economic activities within the area and does not compromise/conflict with existing land use objectives.	Compliance of action and development supported by the plan with policies and land use objectives protective/supportive of economic development in the county defined in the County Development Plan (CDP) or County Local Area Plans.	No contravention of policies and land use objectives protective/supportive of economic development in the county defined in the CDP or County Local Area Plans. Consent for development proposals supported by the plan only to be granted where development will be carried out in accordance with proper planning and sustainable development.	Internal monitoring of compliance with CDP Policy Objectives. Internal monitoring of likely significant environmental effects of development projects.
Biodiversity, Flora & Fauna	B1	Ensure Climate Action does not conflict with biodiversity protection, restoration and rehabilitation.	Compliance of action and development supported by the plan with policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the CDP. Condition of habitats impacted by climate change (Area km <sup>2</sup> /length metres).	No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the CDP. Ensure no habitats are impacted by the effects of climate change. Ensure no reduction in the number of geographic distribution of species as a result of climate change effects.	Internal monitoring of compliance with CDP Policy Objectives. Internal monitoring of compliance with the County Heritage and Biodiversity Plan. Internal monitoring of likely significant environmental effects of development projects.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
			<p>Number and geographical distribution of Species or Species population trends impacted by climate change.</p> <p>Compliance of action and development supported by the plan with policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the County's Heritage and Biodiversity Plan.</p>	<p>No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the County's Heritage and Biodiversity Plan.</p> <p>Planning consent for development proposals supported by the plan only to be granted where development complies with policy supporting biodiversity protection and enhancement.</p>	
	B2	Ensure compliance with Habitats and Birds Directives with regard to protection of European Sites and Annexed habitats and species <sup>4</sup> .	Condition of European Sites and annexed species.	No adverse impacts on the condition of European Sites and Annexed habitats and species as a result of plan implementation.	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Consultation with the NPWS.</p> <p>Department of Housing, Local Government and Heritage report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive.</p> <p>Department of Housing, Local Government and Heritage's National Birds Directive Monitoring Report for the Birds Directive under Article 12.</p> <p>Review of NPWS publications regarding the status of European sites.</p>
	B3	Support Article 10 of the Habitats Directive with regard to the management of features of the landscape which - by virtue of their linear and continuous	Condition of features of the landscape which - by virtue of their linear and continuous structure or their function as stepping stones	No adverse impacts on the condition of features of the landscape which - by virtue of their linear and continuous structure or their function as stepping stones (designated or not) - are of	Internal monitoring of likely significant environmental effects of development projects.

<sup>4</sup> 'Annexed habitats and species' refer to those listed under Annex I, II & IV of the EU Habitats Directive and Annex I of the EU Birds Directive.





Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
		structure or their function as stepping stones (designated or not) - are of major importance for wild fauna and flora and essential for the migration, dispersal and genetic exchange of wild species.	(designated or not) - are of major importance for wild fauna and flora. Linear meters of riparian corridors enhanced with native planting. Fragmentation or breaks in continuity of habitats and loss of wildlife corridors, stepping stones and connectivity (km <sup>2</sup> ). Number of developments consented that have significant greenspace proposals.	major importance for wild fauna and flora as a result of plan implementation. Increase linear metres of riparian corridor enhanced with native planting. Reduce habitat fragmentation or breaks. Increase number of developments consented that have significant greenspace proposals.	Mapping of LR important habitats and species as part of the County's Heritage and Biodiversity Plan.
	B4	To avoid or minimize significant impacts on semi-natural habitats, species, environmental features, or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed for designation; and to comply with the Wildlife Acts 1976-2012 with regard to listed species.	Condition of semi-natural habitats, species, environmental features or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed for designation.	No adverse impacts on condition of semi-natural habitats, species, environmental features or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed for designation, as a result of plan implementation. No adverse impacts on listed species in the Wildlife Acts 1976 - 2012 as a result of plan implementation.	Internal monitoring of likely significant environmental effects of development projects. Mapping of LR important habitats and species as part of the County Biodiversity Plan.
	B5	No net contribution to biodiversity losses or deterioration in response to the biodiversity emergency.	Compliance of development supported by the plan with policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the CDP. No. of developments consented that have significant greenspace proposals. Improved biodiversity areas (Area km <sup>2</sup> /length metres).	No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the CDP. Increase number of developments consented that have significant greenspace proposals. Increase quantum of improved biodiversity areas.	Internal monitoring of compliance with CDP Policy Objectives. Internal monitoring of compliance with the County Heritage and Biodiversity Plan. Internal monitoring of likely significant environmental effects of development projects. Mapping of LR important habitats and species as part of the County Heritage and Biodiversity Plan.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
			Compliance of development supported by the plan with policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the County's Heritage and Biodiversity Plan.	No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the County's Heritage and Biodiversity Plan.  Consent for development proposals supported by the plan only to be granted where development complies with policy supportive of biodiversity protection and enhancement.	
Landscape, Seascape & Visual Amenity	L1	Avoid or minimise impacts to statutory landscape designations defined in the CDP.	Status of Landscape Character Areas, the Seascape, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects.  Number of developments consented that result in avoidable adverse impacts on Landscape Character Areas, the Seascape, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects.  Number of areas in the local authority functional area designated for their landscape character or visual amenity.	All action and development proposals supported by the plan must comply with policy objectives relating to the protection of Landscape Character Areas, the Seascape, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects defined in the CDP.  No development supported by the plan should have an adverse impact on Landscape Character Areas, the Seascape, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects.	Internal monitoring of compliance with CDP Policy Objectives.  Internal monitoring of likely significant environmental effects of development projects.  Review of future iterations of the Landscape Character Assessment
	L2	Avoid or minimise adverse visual effects on residential receptors or other sensitive visual receptors.	Number of developments consented that result in avoidable adverse visual impacts on residential receptors or other sensitive visual receptors.	No development supported by the plan should have a significant adverse visual impact on residential receptors or other sensitive visual receptors.  All development supported by the plan should adhere to relevant Development Management Standards defined in the CDP, in particular standards defined in relation to physical and visual impacts.	Internal monitoring of likely significant environmental effects of development projects.  Review of future iterations of the Landscape Character Assessment.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
Cultural Heritage - Archaeology & Architectural	CH1	Avoid impacts upon archaeological heritage (including entries to the Record of Monuments and Places (RMP)) and architectural heritage (including entries to the Record of Protected Structures (RPS) and National Inventory of Architectural Heritage (NIAHs)).	Percentage of features contained in the RMP (and, where relevant, the associated surrounding context) protected from adverse effects due to action and development occurring as a result of this plan. Percentage of features contained in the RPS and NIAH (and, where relevant, the associated surrounding context) protected from adverse effects due to action and development occurring as a result of this plan.	No features contained in the RMP (nor the associated surrounding context) should be significantly adversely affected as a result of the implementation of this plan. No features contained in the RPS and NIAH (nor the associated surrounding context) should be significantly adversely affected as a result of the implementation of this plan.	Internal monitoring of likely significant environmental effects of development projects. Consultation with the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media. Review of Heritage Plan environmental effect monitoring.
Soils	S1	Avoid or minimise effects on mineral resources or soils.	Number of instances of significant adverse impacts on mineral resources or soils occurring, including the pollution, loss or degradation of mineral resources or soils, as a result of action and development supported by the plan.	No instances of significant adverse impacts on mineral resources or soils occurring as a result of action and development supported by the plan.	Internal monitoring of likely significant environmental effects of development projects. Consultation with Geological Survey of Ireland and review of published data on the soils environment.
Land Use	LU1	Avoid or minimise effects on existing land use.	Number of instances of significant adverse impacts on existing land use as a result of plan implementation.	No instances of significant adverse impacts on existing land use as a result of plan implementation.	Internal monitoring of likely significant environmental effects of development projects. Review of Land Use, Land Use Change and Forestry related Greenhouse Gas emissions calculated in the Baseline Emission Inventory.
Air Quality and Noise	AQN1	Increase the number of people travelling to work or school via public transport or by non-mechanical means.	% change in modal split. Length of new sustainable transport routes developed.	Reduction in private car use. Extension and improvement of the sustainable transport network in the plan area.	Central Statistics Office (CSO) Population data - Commuting in Ireland.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
					Internal monitoring of length of new sustainable transport routes developed.
	AQN2	Avoid or minimise effects on local air quality.	<p>Number of developments consented that result in avoidable adverse air quality impacts on sensitive receptors.</p> <p>Number of exceedances of ambient air quality standards in the County, as monitored under the EPA's National Ambient Air Quality Monitoring Network.</p> <p>Improvements in air quality status in the county.</p>	<p>No development supported by the plan should have a significant adverse air quality impact on sensitive receptors.</p> <p>All development supported by the plan should adhere to relevant Development Management Standards defined in the CDP relating to the protection of air quality.</p> <p>Minimise ambient air quality standard exceedances in the County.</p>	<p>Internal monitoring of likely significant environmental effects of development projects. Consultation with the EPA.</p> <p>Review of EPA Air Quality Monitoring undertaken in the County.</p> <p>Review of EPA annual 'Air Quality in Ireland' Report.</p>
	AQN3	Avoid or minimise adverse noise impacts.	Number of sensitive receptors exposed to noise nuisance.	No sensitive receptors exposed to nuisance noise in the County.	Internal monitoring of likely significant environmental effects of development projects. Monitoring of internal noise complaint investigations undertaken. Consultation with the EPA.
Water	W1	Maintain and/or improve, the quality and status of surface waters.	<p>Status of surface water bodies as reported by the EPA Water Monitoring Programme for the Water Framework Directive (WFD)</p> <p>Status of bathing waters as monitored under the Bathing Water Directive.</p> <p>Number of water bodies achieving High or Good Ecological Status as defined by the WFD within the life-cycle of the Climate Action Plan.</p>	<p>Number of Pollution Incidents detected due to poor bathing water quality results.</p> <p>Not to cause deterioration in the status of any surface water or affect the ability of any surface water to achieve 'good status.'</p> <p>No deterioration in the status of any bathing waters, having appropriate regard to bathing water mandatory and guidelines values defined in the Bathing Water Directive.</p> <p>Implementation of the objectives of the second cycle of the national River Basin Management Plan.</p>	<p>EPA surface water monitoring data and reports.</p> <p>EPA bathing water monitoring data and reports.</p> <p>Review of environmental quality data detailed in the EPA Maps Application.</p>



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
				Increase in number of water bodies achieving High or Good Ecological Status as defined by the WFD within the life-cycle of the Climate Action Plan.	
	W2	Maintain and/or improve, the chemical and quantitative status of groundwaters.	Status of groundwater bodies as reported by the EPA National Groundwater Monitoring Programme for the WFD.	No deterioration in the status of groundwater quality, having appropriate regard to Groundwater Quality Standards and Threshold Values defined under Directive 2006/118/EC.	EPA groundwater monitoring data and reports. Review of environmental quality data detailed in the EPA Maps Application.
	W3	Prevent impact upon the WFD status of surface waters and groundwater in line with the requirements of the WFD.	Number of instances of significant adverse impact on surface water or groundwater bodies resulting in a reduction in water quality or the ability of a water body to achieve 'good' water quality status.  Number of water bodies achieving High or Good Ecological Status as defined by the WFD within the life-cycle of the Climate Action Plan.	No instances of significant adverse impact on surface water or groundwater bodies resulting in a reduction in water quality or the ability of a water body to achieve 'good' water quality status.  Increase in number of water bodies achieving High or Good Ecological Status as defined by the WFD within the life-cycle of the Climate Action Plan.	Internal monitoring of likely significant environmental effects of development projects. Consultation with the EPA.
	W4	Comply as appropriate with the provisions of the Flood Risk Management Guidelines.	Number of incompatible developments (supported by the plan) consented within flood risk areas.	Minimise developments (supported by the plan) granted permission on lands which pose - or are likely to pose in the future - a significant flood risk, having appropriate regard to the Flood Risk Management guidelines.	Internal monitoring of development projects granted consent.
	W5	Prevent impact upon drinking water quality	Number of non-compliances with Drinking Water Quality Standards defined in the European Union (Drinking Water) Regulations 2023.	No non-compliances with Drinking Water Quality Standards defined in the European Union (Drinking Water) Regulations 2023.	EPA Drinking Water Quality Reports. Review of environmental quality data detailed in the EPA Maps Application.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
Material Assets	MAI1	Avoid or minimise effects on built/amenity assets and infrastructure	Number of incompatible developments (supported by the plan) adversely affecting built/amenity assets and infrastructure.	No incompatible development (supported by the plan) adversely affecting built/amenity assets and infrastructure.	Internal monitoring of likely significant environmental effects of development projects.
	MAI2	Avoid or minimise effects upon existing and (where known) planned infrastructure.	Number of incompatible developments (supported by the plan) adversely affecting existing or planned infrastructure, including water supply, wastewater management, energy and transport infrastructure.	No incompatible development (supported by the plan) adversely affecting existing or planned material assets infrastructure.	Internal monitoring of likely significant environmental effects of development projects, including monitoring of effects on other future planned or committed material asset infrastructure projects. Consultation with Irish Water, Gas Networks Ireland, ESB Networks and Transport Infrastructure Ireland.
	MAI3	Promote sustainable transportation.	% change in modal split. Kilometres of permanent segregated cycling network. Kilometres of permanent integrated cycling network. Number of Electric Vehicle charging points in the county. Total Area of road reallocated for sustainable alternatives (m <sup>2</sup> ).	Percentage increase in the number of public transport users in the County Increase kilometres of permanent segregated cycling network. Increase kilometres of permanent segregated cycling network. Increase number of Electric Vehicle charging points in the county. Increase Total Area of road reallocated for sustainable alternatives.	CSO Population data - Commuting in Ireland. Internal monitoring of length of new sustainable transport routes developed.
	MAI4	Promote sustainable waste management.	Tonnes of hazardous waste received at Council Waste Management Facilities annually. Tonnes of W.E.E.E. waste received at Council Waste Management Facilities annually.	Increase waste recycling in the County. Reduce waste generation in the County.	EPA Waste Statistics. Consultation with the EPA.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
			Tonnes of Bulky waste received at Council Waste Management Facilities annually. Tonnes of garden waste received at Council Waste Management Facilities annually.		
	MAI5	Promote sustainable water use and drainage management.	Level of water use in the County. Compliance with Sustainable Drainage System (SuDS) related development management standards defined in the CDP.	Reduced water use in the county. All development (supported by the plan) must comply with SuDS related development management standards defined in the CDP.	CSO water consumption data. Internal monitoring of flood risk associated with of development projects and development project compliance with relevant flood risk and management related development management standards.
Tourism & Recreation	TR1	Avoid or minimise effects upon tourism and recreation amenities.	Visitor trips to local authority functional area	Stable or increasing number of visitor trips to local authority functional area	Fáilte Ireland Data on Tourism Performance
Climate Change	CF1	Delivery of the necessary action to support the national target of 80% electricity from renewable sources by 2030.	Level of Greenhouse Gas (GHG) emissions in the County. Level of renewable energy infrastructure in the County.	Reduce GHG emissions associated with the Energy sector in the County. Increase the level of renewable energy infrastructure in the County.	EPA National Emission Inventory. Baseline Emission Inventory for the County. Megawatt hour (MWh) output from renewable energy infrastructure in the county.
	CF2	Actively support the delivery of all national climate policy as appropriate to the county with the prioritisation and acceleration of evidence-based measures.	Level of GHG emissions in the County	Reduce GHG emissions for all sectors in the County.	EPA National Emission Inventory. Baseline Emission Inventory for the County.
	CF3	Assist in the delivery of the climate neutrality objective at local and community levels.	Level of GHG emissions in the County. Level of GHG emissions in the Decarbonising Zone. Net addition of tree cover added.	Reduce GHG emission in the County to Net Zero. Reduce Decarbonising Zone GHG emissions to Net Zero. Increase level of tree cover in the County.	EPA National Emission Inventory. Baseline Emission Inventory for the County. Baseline Emission Inventory for the Decarbonising Zone.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	CF4	Deliver a Decarbonising Zone (DZ) within the local authority area to act as a test bed for a range of climate mitigation and adaptation measures in a specifically defined area through the identification of projects and outcomes that will assist in the delivery of the National Climate Objective.	Level of GHG emissions in the Decarbonising Zone.	Reduce Decarbonising Zone GHG emissions to Net Zero.	Baseline Emission Inventory for the Decarbonising Zone.
Inter-relationships	IR1	Maintain and improve the health of people, ecosystems and natural processes. Actively seek to integrate opportunities for environmental enhancement during adaptation to climate change.	Number of blue and green infrastructure measures included as part of development projects that have been granted consent.	Increase the number of blue and green infrastructure measures included as part of development projects that have been granted consent.	Review of granted consents.





**CONSULTANTS IN ENGINEERING,  
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