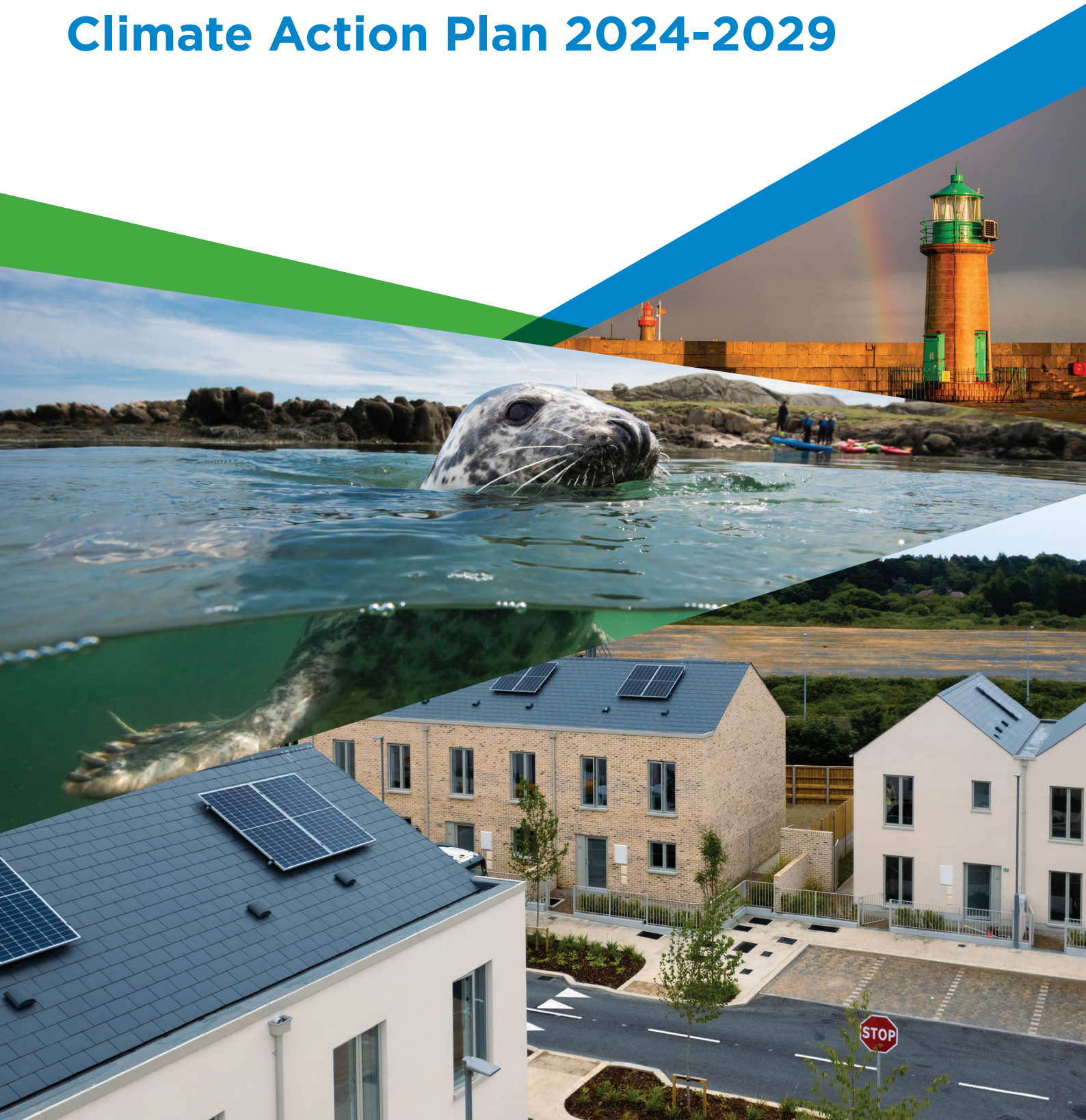


# Dún Laoghaire-Rathdown County Council **STRATEGIC ENVIRONMENTAL ASSESSMENT STATEMENT** Climate Action Plan 2024-2029





CONSULTANTS IN ENGINEERING,  
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PLANNING

# LOCAL AUTHORITY CLIMATE ACTION PLAN

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## Strategic Environmental Assessment Statement

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Prepared for:

Dún Laoghaire-Rathdown County Council



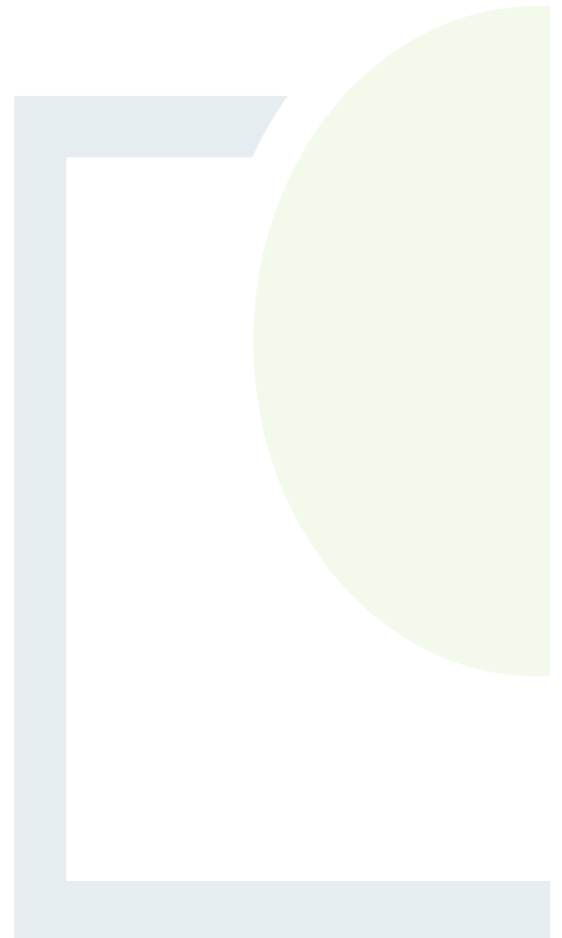
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## Strategic Environmental Assessment Statement

### 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 Dún Laoghaire-Rathdown Local Authority Climate Action Plan to Dún Laoghaire-Rathdown 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

Dún Laoghaire-Rathdown County Council have adopted the Dún Laoghaire-Rathdown 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 on invasive species risk associated with climate change and the need for appropriate need to promote resilience 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.
EPA	<p>An overview of the nature of climate change challenges was provided. The EPA acknowledged the nature, focus and goals of the emerging LACAP was made. It was advised the SEA should seek to maximize climate action co-benefits for air quality, human health, biodiversity, water quality and other interrelated areas (i.e. win-win solutions).</p> <p>Other measures advised on which were relevant to the SEA included: the need to consider the Plan influence on Greenhouse Gas (GHG emissions) the need to manage climate change influenced invasive species spread, the need to have regard to the receiving water quality and air quality environment during the plan-making process.</p> <p>In relation to the SEA specifically, commentary was provided on the approach to mitigation, and on how the plan should consider impacts on air and water quality, water resource, soils/geology, landscape and material assets.</p> <p>The EPA recommended integrating the environmental mitigation defined under the SEA into the Plan, and advised on other interrelated plans and programmes to consider during plan-making and SEA processes.</p>	<p>The recommendation to ensure climate action defined in the Plan created co-benefits underpinned the SEA process and the defined mitigation measures. Where relevant, mitigation measures ultimately defined serve to holistically maximize environmental benefits. The promotion of climate action co-benefits is embedded into the Environmental Governance Principle framework defined for the Plan.</p> <p>Appropriate regard was had to the need to consider the climate change influenced invasive species spread. This was considered when shaping defined climate action and also within the Environmental Governance principle framework defined under the Plan.</p> <p>The receiving water and air quality environmental were appropriately considered and evaluated during the SEA process, in light of the EPA's commentary on baseline water quality and air quality data and information.</p> <p>The nature, focus and level of mitigation measures defined in the SEA Environmental Report were informed by the EPA's commentary. All mitigation measures defined were integrated into the Plan itself. The wording of climate action defined in the Plan was shaped having regard to relevant environmental considerations. A set of Environmental Governance Principles were included in the Plan.</p>
Department of the Environment, Climate and Communications	Background information on the Geological Survey of Ireland was provided initially in this submission. An overview of county-level geoheritage and groundwater assets and databases was provided. Information was provided on geological, geotechnical, geothermal, natural resources, geochemistry and geophysical data sources. Specific advice on geological/hydrogeological considerations that needed to be taken into account during the making of the Plan was provided, as follows:	Appropriate regard was had to these baseline geological and hydrogeological data sources and considerations during the preparation of the SEA Environmental Report for the LACAP.



Environmental Authority	Summary on the Scoping Consultation Submission	How was this submission taken into account during the SEA?
	<ol style="list-style-type: none"> <li>1. Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general.</li> <li>2. Geohazards should be considered during the Plan-making and development processes.</li> <li>3. Sustainable development of our natural resources should be an integral part of all development plans from a national to regional to local level to ensure that the materials required for our society are available when required.</li> </ol>	
<p>Department of Housing, Local Government and Heritage</p>	<p>The Department recommended clarifying and confirming some baseline biodiversity related information contained in the Scoping Report during the production of the SEA Environmental Report (relating to Flora Protection Orders).</p> <p>The Department advised on various other impact assessment related matters, as follows:</p> <ul style="list-style-type: none"> <li>- The potential impact linear infrastructure, including active travel and green infrastructure projects, may have on biodiversity and the water environment (e.g., due to artificial lighting)</li> <li>- The need to consider impacts on flora and fauna when planning and executing flood/coastal defence works.</li> <li>- The need to consider impacts on biodiversity due to renewable energy and ancillary infrastructure development.</li> </ul>	<p>Baseline biodiversity information was reviewed carefully, clarified and updated as necessary during the finalization of the SEA Environmental Report, having appropriate regard to the Department's commentary in relation to baseline data. All Flora Protection Order detail was confirmed/clarified having regard to the Department's commentary (e.g., the presence of species t Booterstown Marsh, Glencullen etc.).</p> <p>All advice with respect to the potential impacts of the LACAP was considered during the environmental assessment process. The need to assess and mitigated the effects of development/infrastructure supported by the Plan was one aspect that underpinned the SEA. With the adoption of the proposed mitigation, including the Environmental Governance Principles, the LACAP does not support the carrying out of any development that may lead to adverse effects on biodiversity or European sites. Mitigation was incorporate into climate action relating to linear infrastructure, flood/coastal works and renewable energy specifically.</p>



## 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.

Several integrated environmental considerations relating to decarbonising zone opportunities were established to guide plan implementation. These principles are defined in Table 2-2:

**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
EB3	Facilitate the development of offshore renewable energy projects	Attach the following text to the action: whilst advocating and exerting influence to ensure such projects promote climate action co-benefits, support homeowners, schools, businesses, community and club facilities in their endeavours to reduce their carbon footprint and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.
EB6	Increase share of renewables in Council's energy consumption.	Attach the following text to the action: where it is confirmed through appropriate environmental assessment that associated renewable energy development will not have any significant environmental effect.
EB9	Undertake energy upgrades on Council-owned housing stock through the Energy Efficiency Retrofitting Programme.	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.
EB12	Implement energy upgrades on Council-owned buildings (non-housing).	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.
EB17	Carry out energy performance monitoring/ research projects in Council-owned housing and/or buildings.	Attach the following text to the action: ensure monitoring/research outputs are incorporated into future decision making processes.
EB19	Increase the proportion of public lighting using high-energy efficiency/LED lighting.	Attach the following text to the action: while ensuring the lumen levels and spectral range are maintained or reduced/controlled to avoid effects to biodiversity.
EB20	Create a 'Green Building Neighbourhood' incorporating Energy creation, storage and distribution including aspects of retrofit insulation and 'smart' building management' (known as the ProBono Project).	Attach the following text to the action: having due regard to the need to ensure renewable energy development forming part of this project will not have any significant negative environmental effect.
EB21	Reduce energy use of Council owned heritage properties.	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.
EB22	Develop projects to promote adaptive reuse/increased use of historic structures/traditional buildings.	Attach the following text to the action: having appropriate regard to protected species and structures regulations.



LACAP Action Reference	LACAP Action	Mitigation Measure
EB26	To improve climate resilience and energy performance of architectural and archaeological heritage in public and private ownership through heritage funding schemes.	Attach the following text to the action: <b>subject to appropriately protection and restoration considerations.</b>
F1	Progress Flood Alleviation schemes in the county in conjunction with the Office of Public Works (OPW).	Attach the following text to the action: <b>having due regard to the need to promote nature based solutions and Sustainable Drainage Systems, and environmental sensitivities at these locations, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.</b>
F7	Identify and progress minor works schemes to resolve recurring flood issues, where possible, ensuring the schemes are designed and implemented to include Sustainable Urban Drainage Systems (SuDs) / nature-based solutions.	Attach the following text to the action: <b>protection of biodiversity and avoidance of habitat fragmentation.</b>
F16	Maintenance of key lakes and wetlands, existing flood storage facilities to maintain storage capacity during severe weather events.	Attach the following text to the action: <b>having due regard to the need to appropriately protect, conserve and enhance important habitats and species and European sites, and support the maintenance and improvement of water quality in line with the aims of the Water Framework Directive.</b>
F17	Update the Coastal Defence Strategy report to advise future protection measures and implement as necessary.	Attach the following text to the action: <b>having due regard to the need to promote nature based solutions and Sustainable Drainage Systems, and environmental sensitivities associated with coastal areas such as the receiving marine environment, biodiversity, European sites, recreation and amenity value.</b>
F19	Work with Córas Iompair Éireann (C.I.E.) on Coastal Defence Measures.	Attach the following text to the action: <b>having due regard to environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value.</b>
F20	Develop an Integrated Coastal Zone Management Plan.	Attach the following text to the action: <b>Develop an Integrated Coastal Zone Management Plan, which supports the appropriate protection and enhancement of the coastal environment.</b>
R4	Support the capture of waste electric and electronic equipment (WEEE) at authorised Council Recycling Centres and free WEEE collection events	Attach the following text to the action: <b>at appropriately authorised County Council Recycling Centres.</b>
R6	Continue to accept garden waste at Ballyogan Recycling Park.	Attach the following text to the action: <b>in accordance with the environmental management and protection related conditions contained in the waste licence for this facility.</b>
R19	Carry out deep Cleans of Towns and Villages	Attach the following text to the action: <b>in a manner which does not adversely impact air or water quality, or native biodiversity.</b>
N9	Prepare and implement a Habitat and Species Management Plan for Killiney and Roches Hill pNHA in the face of climate change and wildfires.	Attach the following text to the action: <b>having appropriate regard to the need to support the achievement of conservation objectives and protect and enhance the qualifying interests of this site.</b>



LACAP Action Reference	LACAP Action	Mitigation Measure
N10	Prepare a Habitat and Species Management Plan for Booterstown Marsh proposed National Heritage Area (pNHA), a Protected Plant Species Site and part of the South Dublin Bay and Tolka Estuary SPA subject to the agreement of the National Parks and Wildlife Service.	Attach the following text to the action: having appropriate regard to the need to support the achievement of conservation objectives and protect and enhance the qualifying interests of this site.
N11	Develop guidance on biodiversity inclusive design for housing development including social housing with green roofs, wetland & pond SuDS, green carparking, nest boxes, local soil and seed for landscaping, and wildlife friendly shrubs and trees	Attach the following text to the action: Develop guidance on biodiversity inclusive design for housing estates with green roofs, wetland & pond SuDS, green carparking, nest boxes, local soil and seed for landscaping, and wildlife friendly shrubs and native trees. Ensure such guidance is designed to support the carrying out of biodiversity inclusive development in a manner that does not cause any unintended negative environmental effects.
N12	Develop guidance on biodiversity and cycleways/pathways to ensure that the location and design of greenways is not at the loss of biodiversity and to provide guidance on biodiversity enhancements.	Attach the following text to the action: ensuring due regard is given to the operational phase effects on biodiversity such as disturbance, trampling, litter management and signage.
N17	Development of on-street Sustainable Urban Drainage systems (SuDS) within the county with an emphasis on nature-based solutions/SuDS where possible following best practice design and governmental guidance.	Attach the following text to the action: ensuring all SuDS related construction works are designed and implemented in a manner that does not result in the occurrence of significant adverse environmental effects.
N22	Implement Green Infrastructure (G.I.) Strategy in line with E.U. G.I. definition and policies that incorporates climate change mitigation and adaptation.	Attach the following text to the action: having due regard to environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value.
N26	Expand the community garden model developed at Fernhill Park to other locations in the County.	Attach the following text to the action: having due regard to environmental sensitivities such as European sites and biodiversity.
C1	Administer the Community Climate Action Fund.	Attach the following text to the action: having due regard to environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value.
C9	Increase climate themed events for national events such as National Heritage Week, Cruinniú and Bealtaine.	Attach the following text to the action: having due regard to environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value
C10	Design an innovative and creative project to use a heritage site to creatively engage local communities with climate change, climate mitigation and heritage.	Attach the following text to the action: having due regard to environmental sensitivities such as European sites and biodiversity.
C16	Support the Council Sports Partnership in co-ordinating and delivering Walking Programmes in the County.	Attach the following text to the action: having due regard to environmental sensitivities such as European sites and biodiversity.
T1	Deliver a safe active travel network for people of all ages and abilities by implementing the County and Greater Dublin Area Cycle Network.	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.



LACAP Action Reference	LACAP Action	Mitigation Measure
T4	Provide digital and physical heritage interpretation along active travel routes.	Attach the following text to the action: <b>in appropriate locations.</b>
T5	Implement the 'Safe Routes to School' Programme in the County.	Attach the following text to the action: <b>having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality, cultural heritage etc.</b>
T6	Support the implementation of Department of Transport Pathfinder Projects.	Attach the following text to the action: <b>having appropriate regard to environmental sensitivities such as traffic and transport constraints and aspects, European sites and biodiversity.</b>
T7	Expand the EV / ebike / eScooter charging networks in the County, including disabled access for EV charging.	Attach the following text to the action: <b>having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage etc.</b>
T8	Reallocate road space to provide for sustainable travel alternatives.	Attach the following text to the action: <b>having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage etc.</b>
T13	Expand the network of secure, public cycle and scooter parking to accommodate a variety of transportation modes.	Attach the following text to the action: <b>having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality, and cultural heritage.</b>
T15	Facilitate public transport development in the County.	Attach the following text to the action: <b>whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.</b>
T18	Increase the number of vehicles and machinery in the Council fleet that are electric or using renewable fuels.	Attach the following text to the action: 'Increase the number of vehicles and machinery in the Council fleet that are electric or using <b>sustainably sourced</b> renewable fuels.
T21	Identify opportunities and upgrade existing road network drainage systems.	Attach the following text to the action: <b>having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality, and cultural heritage.</b>
T22	Develop and implement an annual Bridge Inspection and Maintenance Programme and increase the number of bridge structures on which maintenance works are carried out annually.	Attach the following text to the action: <b>having appropriate regard to protected species and structures regulations.</b>



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

Promote climate action projects that support and maximise 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 a significant negative effects on the receiving environment shall be supported.
Flood and coastal defence 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 unauthorised physical damage to cultural, archaeological or architectural features, or unauthorised or inappropriate alteration of the context of sensitive cultural heritage features.'
Ensure climate action related projects are carried out in a manner that promotes climate action water quality co-benefits, and align with the provisions of the Water Framework Directive and relevant River Basin Management Plan.

**Table 2-4: Proposed Environmental Mitigation Measures – Integrated Environmental Considerations relating to Decarbonising Zone Opportunities included in the Plan**

The opportunities progressed, and any associated activities and development, such as energy, heating or active travel related development, shall have due regard to the need to protect sensitive aspects of the receiving environment, including local human receptors; European sites and biodiversity; heritage features, protected structures and the context in which such features sit; and the receiving water, soils and local air quality environment.
Any opportunities progressed that result in the development of renewable energy development, such as wind turbine development or solar panel development, shall specifically have due regard to the need to protect sensitive aspects of the environment from the typical effects of such development, including avifauna effects or landscape and visual related effects, including glint and glare.
Dún Laoghaire- Rathdown County Council (DLR) will advocate and exert influence to ensure that opportunities progressed that lead to the development of additional electricity network infrastructure, including linear cable infrastructure development, by electricity network operators, does not contravene relevant planning and environmental protection criteria or cause significant negative environmental effects.
Any opportunities progressed that support the upgrade of public lighting, shall have due regard to the need to ensure the lumen levels and spectral range of such lighting are maintained or reduced/controlled to avoid effects on biodiversity.

**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 2-5. Updates were made to the SEA and AA documentation where relevant following on from receipt and consideration of the consultation submissions.



**Table 2-5: Responses to Consultation Submissions**

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
EPA	The SEA should also assist in identifying ways to maximise the potential co-benefits of climate-related measures for air quality, human health, biodiversity, water quality and other interrelated areas (i.e. win-win solutions).	Noted and agreed. It 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.	None.	None.
	We recommend that the findings of the SEA ER and NIS are fully reflected in the Plan, to ensure that the relevant recommendations are fully considered and integrated as appropriate.	Noted and agreed. Environmental mitigation measures in the form of Environmental Governance Principles and climate action amendment suggestions have been fully integrated into the Plan itself.	None.	None.
	Environmental Authorities Under the SEA Regulations, you should consult with: <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> 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.	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.	None.	None.
	<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. 434 Of 2004, as amended.	It was assumed that SI No. 434 was a typo and SI No. 435 is what was intended to be addressed with this statement.  The requirements of Schedule 2 of SI No 435 have been noted and amendments to the NTS have been made as appropriate.	None.	Updated the NTS to reflect the relevant information as required under Schedule 2 of SI No 435 of 2004 as amended.
	<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	Noted and agreed. It was noted that this was in reference to the LACAP and not the SEA ER or AA NIR documentation.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>sets out the key plans, programmes and policies considered in preparing the SEA.</p> <p>The Plan should include a commitment to remain aligned with high level plans and programmes, Guidelines, and legislation over its lifetime. The Climate Action Plan 2024 is currently being prepared and work will be commencing on the review of the National Planning Framework and Regional Spatial and Economic Strategies also. Any relevant updates of these plans/strategies should be integrated as appropriate into the Plan as relevant and appropriate.</p> <p>The Plan should include a commitment to consider any relevant updated actions, 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>It was recommended the Council include a commitment in the Plan to remain aligned with high level plans and programmes if this was not done already.</p> <p>It was recommended the plan 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><b>Strategic Environmental Objectives</b></p> <p>We recommend that in considering strategic environmental objectives, they should where possible reflect the plan being prepared, rather than use more generic environmental objectives. This will help both in considering more specific monitoring and mitigation measures, when required.</p>	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.	None.	None.
	<p><b>Alternatives</b></p> <p>We note the alternatives considered in the SEA and acknowledge the preferred option selected</p>	Noted.	None.	None.
	<p><b>Mitigation Measures</b></p> <p>Where the potential for likely significant effects has been identified, you should provide appropriate mitigation measures to avoid or minimise these. You should also ensure that the Plan includes clear commitments to implement the relevant mitigation measures.</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>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>	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
		<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="https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf">https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/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 '<i>Guidance on SEA Statements and Monitoring</i>' (2020).</p> <p>The monitoring programme is multi-faceted, broad in scope and has been designed to allow for a flexible and adaptive approach to SEA monitoring during Plan implementation.</p> <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:  <i>'Where monitoring identifies that the implementation of the LACAP is having a significant negative environmental effect, an in-depth review of the LACAP should take place and the LACAP should be updated in a manner that satisfactorily mitigates these environmental effects (i.e., through the adoption of additional environmental mitigation measures.). Similarly, where monitoring indicates that potential positive environmental effects associated with LACAP implementation are not being adequately realized, the LACAP should be reviewed and updated in a manner that supports the realization of all potential positive</i></p>	None.	<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>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
		<p><i>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 was 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’. Delivering Ireland’s long term sustainable development and environmental objectives will involve many different stakeholders to address these key actions. The report recognises the need for full implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies.</p> <p>The EPA are currently preparing the next iteration of the SOER report, which will be published in 2024. We recommend 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>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>	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>SEA Statement – “Information on the Decision”</p> <p>Once the Plan is adopted, you should prepare an SEA Statement that summarises:</p> <ul style="list-style-type: none"> <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>	Noted. An SEA statement was produced and circulated to any environmental authority consulted during the SEA process.	None.	None.
	<p><b>Future Amendments to the Plan</b></p> <p>You should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan</p>	Noted.	None.	None.
Sea Fisheries coordination DAFM	<p>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.</p>	Noted.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	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 for 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 ( <a href="#">Agriculture, Forest and Seafood Climate Change Sectoral Adaptation Plan</a> ) and the annual Climate Action Plan ( <a href="#">CAP23</a> ) 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 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.	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 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.).	Reference was made to the European Commission's Communication on the energy transition of the fisheries and aquaculture sector in Section 3.4 - <i>In-combination effects with Other Plans and Programmes</i> , and Appendix 2 - <i>Relationship with other plans and programmes</i> , as appropriate.	Reference was made to the European Commission's Communication on the energy transition of the fisheries and aquaculture sector in Section 7.3 - <i>Potential Cumulative Effect of the 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.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
DHLGH	<p><b>Archaeology</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 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.</p>	Noted.	None.	None.
	<p>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.</p>	Noted.	None.	None.
	<p>For example, it is recommended that the strategies should consider:</p>	The SEA scoping report and SEA Environmental Report identify the built and archaeological heritage assets in the LA including structures and sites subject to	None.	None.





Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<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>	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.		
	Including objectives to carry out climate change risk assessments, including condition assessments, for the historic structures and sites in its area	Noted. It was recommended the local authority consider this commentary.	None.	None.
	Including objectives to develop disaster-risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area	Noted. It was recommended the local authority consider this commentary.	None.	None.
	Including objectives to develop resilience and adaptation strategies for the built and archaeological heritage in its area.	Noted. The Plan defines action that will improve the climate resilience of architectural and archaeological heritage within the local authority's remit.	None.	None.
	Developing the skills capacity within the local authority to address adaptation/mitigation/emergency management issues affecting heritage assets in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works.	Noted. It was recommended that the local authority consider this as appropriate.	None.	None.
	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	Noted. It was recommended that the LA consider this as appropriate.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	Officer and Archaeologist should be included in the local authority's Adaptation Steering Group.			
	You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: referrals@npws.gov.ie	Noted. It was recommended that the LA consider this as appropriate.	None.	None.
Department of Housing, Local Government and Heritage	Having considered the Draft Dún Laoghaire-Rathdown County Council Climate Action Plan 2024-2029 and the Strategic Environmental Assessment (SEA) Environmental Report and Natura Impact Report (NIR) prepared in relation to this draft plan the Department makes the following observation.	Noted.	None.	None.
	The Department previously in August of this year made a submission in relation to the scoping of the SEA for the Dún Laoghaire-Rathdown County Council Climate Action Plan. In this submission corrections were suggested with regards to factual errors concerning the occurrence of protected plant species in the Dún Laoghaire-Rathdown County Council administrative area contained in Table 3.1 'Designated Ecological sites and Protected Species' in Section 3.3 Biodiversity, Flora and Fauna of the scoping report. It is noted that these factual errors have not been corrected in the corresponding Table 4.1 'Designated Ecological Sites and Protected Species' in Section 4.3 Biodiversity, Flora & Fauna of the SEA Report prepared in relation to the Draft Climate Action Plan. It is therefore recommended that Table 4.1 in the SEA Environmental Report should be modified to incorporate the corrections with regards to the occurrence of protected plant species in the Dún Laoghaire-Rathdown area suggested in the Department's submission on the SEA scoping for the Climate Action Plan.	Noted. The correction of these errors did not alter the development of the Plan-level environmental assessment undertaken. The environmental mitigation defined serves to ensure environmental protection at source.	The NIR was updated to correct these factual errors	The SEA ER was updated to correct these factual errors.
	Amongst the corrections in the Department's submission referred to above with regards to the occurrence of protected plant species in the Dun Laoghaire-Rathdown area the presence of the protected species Puccinellia fasciculata Borrer's Saltmarsh-grass in Booterstown Marsh was noted.	Noted.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>This is relevant to Action N10 of the Climate Action Plan included under the heading Nature Based Solutions which is to “Prepare a Habitat and Species Management Plan for Booterstown Marsh proposed Natural Heritage Areas (sic) (p.N.H.A)”, which is subject to Note A “Having appropriate regard to the need to support the achievement of conservation objectives and protect the qualifying interests of this site”. As a site of a plant species protected under the Flora (Protection) Order 2022 (Statutory Instrument S.I No. 235 of 2022) any interference with Booterstown Marsh is illegal except under licence from the National Parks and Wildlife Service of this Department. It should also be noted that while Booterstown Marsh is listed to be proposed for designation as a Natural Heritage Area (NHA), it is part of an already designated European site, the South Dublin Bay and Tolka Estuary Special Protection Area (SPA).</p>			
	<p>The Department therefore recommends that the wording of Action N10 of Climate Action Plan should be altered to ‘Prepare a Habitat and Species Management Plan for Booterstown Marsh, a Protected Plant Species Site and part of the South Dublin Bay and Tolka Estuary SPA subject to the agreement of the National Parks and Wildlife Service’.</p>	<p>Note and agreed. It was recommended the Council make this non-material amendment.</p>	<p>None.</p>	<p>None.</p>



## 2.5 SEA and Plan Modifications

Dún Laoghaire-Rathdown County Council 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 Action modifications made during the plan-making process are presented in Table 2-6. No modifications affecting the SEA and AA processes were made upon Plan Adoption.

**Table 2-6: Plan Action Modifications**

Action	Summary of Modification
C24	The following new action is to be included in the Community Engagement section of the LACAP: "Explore and respond to ways in which the Climate transition will affect different groups in the county including facilitating skills training and energy poverty reduction measures so that no one is left behind." Tracking Measure: Number of people availing of interventions offered. Timeframe: 2029. Adaptation /Mitigation: Mitigation. Council Role: Full Accountability/ Influence/Co-ordinate and facilitate /Advocate. Lead Department(s) Infrastructure and Climate Change (including Road Maintenance and Traffic) Partners Identified: Codema, Third Level Institutions, the HSE and the Community and Voluntary Sector.
C20	The action below has been amended to read as follows: "Promote energy awareness within the county and the Council including workshop type events"
EB8	Action EB8 to include Infrastructure and Climate Change (including Road Maintenance and Traffic) as a 'Lead Department'.
EB9	Action EB9 include the additional text into the 'Tracking Measure' as follows: 'The number of energy and decarbonisation upgrades carried out through the Energy Efficiency Retrofitting Programme (EERP). '



Action	Summary of Modification
EB12	Action EB12 to be updated and include 'Lead Department(s)' <b>Corporate Affairs (including IT and Human Resources) and Infrastructure and Climate Change (including Road Maintenance and Traffic)</b>
EB12	<b>Architects, dlr Energy Team and Codema to be included</b> as 'Partner(s) Identified'.
EB17	Action EB17 to include <b>Codema</b> as a 'Partner(s) Identified'.
EB18	Action EB18 to include <b>Codema</b> as a 'Partner(s) Identified'.
EB21	Action EB21 include the additional text into the Tracking Measure: <b>'Energy use and decarbonisation'</b> Action EB21 include <b>Corporate Affairs (including IT and Human Resources)</b> as a 'Lead Department'.
EB25	Action EB25 include <b>Corporate Affairs (including IT and Human Resources)</b> as a 'Lead Department'.
T13	<b>"Note A"</b> text to be added to action T13
T21	<b>"Note A"</b> text to be added to action T21
T20	This action will be updated from 'Assess the condition of road infrastructure within the County' to the following: <b>"Identify opportunities to upgrade the existing road and footway network to mitigate damage due to weather events and to provide new footpaths."</b> The wording of tracking measure will be altered to: <b>'Length of existing road network upgraded. Length of footway repaired.'</b> The wording of timeframe will be altered to read: <b>'2024 and annually thereafter.'</b> Both ' will be replaced with <b>'Adaption'</b>
C8	Change to the Draft Plan to include the words <b>'and Blue/Green Infrastructure'</b> in Action C8 'Action' column.
C8	Include <b>'Planning and Economic Development (including Dún Laoghaire Harbour) and Private Landowners</b> as Partners Identified for this action.
F11	Include <b>Private Landowners</b> as Partners Identified relating to Urban Greening.
N11	Change to Action N11 as follows: <b>"Develop guidance on biodiversity inclusive design for housing development including social housing with green roofs, wetland &amp; pond SuDS, green carparking, nest boxes, local soil and seed for landscaping, and wildlife friendly shrubs and native trees."</b>
N25	Change to the Draft Plan to include <b>Community Gardens Ireland</b> as an Identified Partner for action N25.
N13	Change to be made to Action N13 to remove the words 'Publish and', to read as: <b>"Implement the Council's Tree Strategy 2023-2029 (A Climate for Trees)."</b>
N11, N23, N24	<b>Airfield Estate</b> to be added as a 'Partner Identified'
N17	Add 'with an emphasis on nature-based solutions/SuDs wherever possible following best practice design and governmental guidance' to action N17 to read as follows: <b>"Development of on-street Sustainable Urban Drainage systems (SuDS) within the county with an emphasis on nature-based solutions/SuDS where possible following best practice design and governmental guidance."</b>
N/A	Edit to page 150 of Draft Plan to correct Action numbering from N25 and N26 to <b>N24 and N25</b> .
R16	Action R16 will be expanded to read: <b>"Monitor and review use of Smart Bins in the county including conducting a trial to collect compostable waste in the decarbonising zone."</b> Tracking Measure to also include: <b>'Volume of food waste segregated for composting from Smart Bins during the trial.'</b> Timeframe to also include: <b>'2029'</b>



Action	Summary of Modification
	Council Role: <b>Full Accountability/Influence/Co-ordinate and facilitate.</b>
R4	Alter the wording of Action R4 to read: <b>"Support the capture of waste electric and electronic equipment (WEEE) at authorised Council Recycling Centres and free WEEE collection events."</b> Alter the Tracking Measure to read: <b>'Tonnes of WEEE waste received at Recycling Centres and public events annually'</b>
R10	Revise Action R10 and expand it to read: <b>"Develop a vision for Dún Laoghaire-Rathdown to become a circular county including the feasibility of setting up blue/circular economy hubs in the county."</b>
C23	New Action C23 to be added reading: <b>"Facilitate Uisce Éireann's delivery of water demand/conservation campaigns for schools, households and businesses."</b> Tracking Measure: <b>'Number of campaigns carried out.'</b> Timeframe: <b>'2024 and Annually thereafter'.</b> Action Type: <b>'Mitigation'</b> Council Role: <b>'Facilitate'.</b> Lead Department: <b>'Infrastructure and Climate Change (inc. Road Maintenance and Traffic)'</b> Partner Identified: <b>'Uisce Éireann'.</b>
R5	Community Reuse Network Ireland will be altered to read <b>Community Resources Network Ireland</b> as a 'Partner Identified' in the delivery of Action R5.
C7	Change to Action C7 to include <b>Creative Ireland</b> as a 'Partner(s) Identified'
C17	Revise Action C17 to read: <b>"Provide education and raise awareness of the impacts of climate change on biodiversity and water quality."</b>
C25	New action to be added C25: <b>'Produce a newsletter to encourage all within the county to take climate action and to report on the progress being made in implementing the actions over the lifetime of the Plan'.</b> Tracking Measure: <b>'Number of Newsletters produced annually.'</b> <b>Timeframe: 2024 Annually thereafter.'</b> Adaptation/Mitigation: <b>Mitigation.</b> Council Role: <b>Full Accountability.</b> Lead Department(s): <b>Infrastructure and Climate change (inc. Road Maintenance and Traffic) and Corporate Affairs (inc. IT and Human Resources).</b>
C6	Wording for C6 revised to read: <b>"Work in partnership with residents, community groups, sports clubs and schools in climate related programmes."</b>
C6	<b>Community, Cultural Services and Parks</b> to be added as joint 'Lead Department(s)' for the implementation of this action.
C19	Action C19 to be altered include additional text as follows: <b>'Create training programmes for local authority staff/public in the use of traditional and sustainable materials and skills, carbon literacy, protection of heritage assets and any other specific skills training necessary to address the adaptation, mitigation and emergency management issues arising from the impact of climate change'.</b>



Action	Summary of Modification
EB3	<p>Wording of EB3 to be altered to read 'Facilitate the development of offshore renewable energy projects whilst advocating and exerting influence to ensure such projects promote climate action co-benefits, support homeowners, schools, businesses, community and club facilities in their endeavours to reduce their carbon footprint and do not contravene relevant environmental protection criteria or cause significant negative environmental effects'.</p> <p>Tracking Measure to be altered to add 'Offshore Renewable Projects undertaken'</p>
C9	<p>Wording of Action C9 will be updated to read 'Increase climate themed events for national events such as National Heritage Week, Cruinniú and Bealtaine'.</p>
C14	<p>Action C14 will be revised and expanded to read:</p> <p>"Promote and support Circular Economy initiatives with businesses and the community including the feasibility of setting up of blue/circular economy hubs in the county."</p>
C14	<p>The Rediscovery Centre will be added as a 'Partner Identified' to C14.</p>
C11	<p>Action C11 will be revised and expanded to read:</p> <p>'Encourage and support schools implementing the An Taisce Green Schools Programme and the Farmer Time Programme'.</p> <p>The Tracking Measure will be revised to read:</p> <p>'Number of schools awarded Green Flag. Number of schools participating in Farmer Time Programme.'</p> <p>Partner(s) Identified will be revised to read An Taisce Airfield Estate.</p>
N10	<p>Change to the Draft Plan for Action N10 to include the additional text as follows:</p> <p>"Prepare a Habitat and Species Management Plan for Booterstown Marsh proposed National Heritage Area (pNHA), a Protected Plant Species Site and part of the South Dublin Bay and Tolka Estuary SPA subject to the agreement of the National Parks and Wildlife Service."</p>
EB1A	<p>The following new action was included in the Plan:</p> <p>Review how planning applications demonstrate regard to the relative energy cost of and expected embodied and operational carbon emissions and demonstrate maximum energy efficiency over the lifetime of the development to align with climate policy.</p> <p>Tracking Measure: Number of applications reviewed</p> <p>Timeframe: 2024, Annually thereafter</p> <p>Lead Department: Planning and Economic Development (including Dún Laoghaire Harbour)</p> <p>Partner Identified: Forward Planning Infrastructure</p>
EB20A	<p>The following new action was included in the Plan:</p> <p>Work with partners in the Climate Action Regional Office, CODEMA and others to develop a plan to reduce Scope 3 emissions over the lifetime of the Plan.</p> <p>Tracking Measure: Scope 3 Reduction Plan developed</p> <p>Timeframe: 2029</p> <p>Lead Department: Infrastructure and Climate Change (including Road Maintenance and Traffic)</p> <p>Partner Identified: Climate Action Regional Office CODEMA Neighbouring Local Authorities Other Agencies.</p>
T17	<p>The following action was amended as follows:</p> <p>Expand the number of controlled crossings and zebra crossings.</p> <p>Additional Tracking Measure: Number of zebra crossings.</p>
T19	<p>The following action was amended as follows:</p> <p>Implement alternative treatments for winter maintenance operations and respond appropriately in line with the latest available guidance, practices and industry standards to any longer-term weather predictions advised by Met Eireann and the Vaisala road condition forecast system</p>
R1A	<p>The following new action was included in the Plan:</p> <p>Ensure compliance with Solid Fuel Regulations through inspection of and monitoring of solid fuel suppliers.</p> <p>Tracking Measure: Number of inspections per year as per RMCEI Plan</p> <p>Timeframe: 2024 Annually thereafter</p>



Action	Summary of Modification
	<p>Lead Department: <b>Infrastructure and Climate Change (including Road Maintenance and Traffic)</b></p> <p>Partner Identified: <b>Department of Environment, Climate and Communications</b></p>
R6	<p>The following action was amended as follows:</p> <p>Continue to accept garden waste at Ballyogan Recycling Park, in accordance with environmental management and protection related conditions contained in the waste licence for this facility <b>and develop a composting strategy for organic waste collected by/generated by the Council.</b></p> <p>Additional Tracking Measure: <b>Composting strategy developed.</b></p> <p>Additional Timeframe: <b>2025.</b></p>
R12	<p>The following action was amended as follows:</p> <p>Monitor municipal solid waste generated annually in corporate dlr buildings <b>with a view to reducing the quantity of this waste sent for incineration.</b></p> <p>Additional Tracking Measure: <b>Tonnes of solid municipal waste.</b></p>
C26	<p>The following new action was included in the Plan:</p> <p><b>Promote and encourage retrofitting of housing and multi-unit developments while sharing Council knowledge and best practices, with an emphasis on reaching households at risk of fuel poverty.</b></p> <p>Tracking Measure: <b>Number of engagement events per year</b></p> <p>Timeframe: <b>2024 Annually thereafter</b></p> <p>Lead Department: <b>Architects</b></p> <p>Partner Identified: <b>Multi -Departmental, Approved Housing Bodies Tenants' Organisations Owner Management Companies Private Landlords</b></p>





## 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.

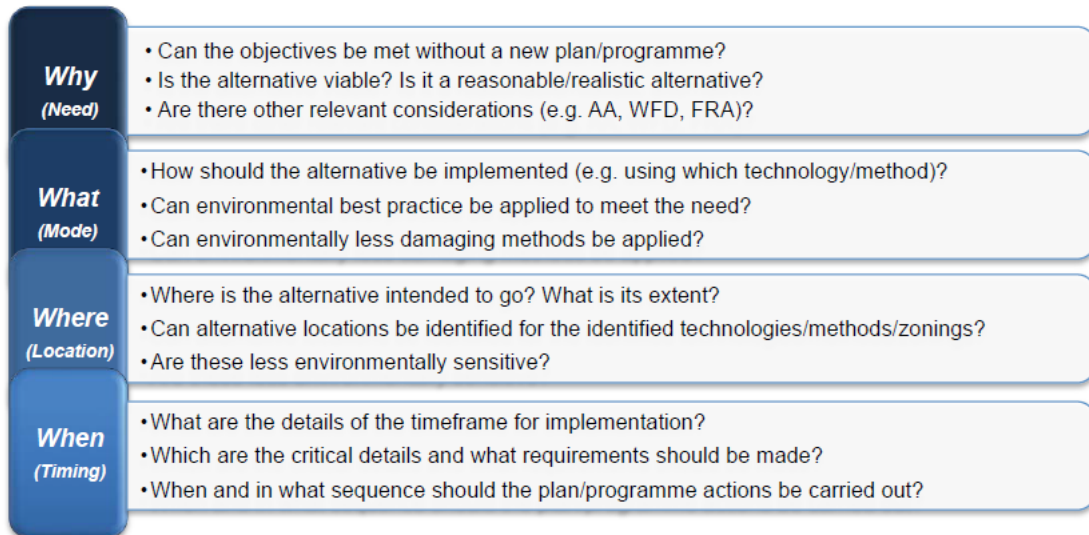
### 3.2 Approach to Developing Reasonable Alternatives

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 lead to some positive environmental effects and would have 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 effect, 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.

Dún Laoghaire-Rathdown County Council 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 and Climate Change section of Dún Laoghaire-Rathdown 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 are 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.  Planning 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).  Number and geographical distribution of Species or Species population trends impacted by climate change.	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 Biodiversity Action Plan.  Internal monitoring of likely significant environmental effects of development projects.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
			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 Biodiversity Action Plan.	No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the County's Biodiversity Action Plan.  Planning consent for development proposals supported by the plan only to be granted where development complies with policy supporting biodiversity protection and enhancement.	
	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.	Internal monitoring of likely significant environmental effects of development projects.  Consultation with the NPWS.  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.  Department of Housing, Local Government and Heritage's National Birds Directive Monitoring Report for the Birds Directive under Article 12.  Review of NPWS publications regarding the status of European sites.
	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 structure or their function as stepping stones (designated or not) - are of major importance for wild fauna and flora and essential for the migration,	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 major importance for wild fauna and flora.  Linear meters of riparian corridors enhanced with native planting.	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 major importance for wild fauna and flora as a result of plan implementation.  Increase linear metres of riparian corridor enhanced with native planting.	Internal monitoring of likely significant environmental effects of development projects.  Mapping of LR important habitats and species as part of the County Biodiversity Plan.

<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
		dispersal and genetic exchange of wild species.	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.	Reduce habitat fragmentation or breaks. Increase number of developments consented that have significant greenspace proposals.	
	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.	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). 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 Biodiversity Action Plan.	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. No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the County's Biodiversity Action Plan. Planning consent for development proposals supported by the plan only to be granted where development complies with policy supportive of biodiversity protection and enhancement.	Internal monitoring of compliance with CDP Policy Objectives. Internal monitoring of compliance with the County Biodiversity Action Plan. Internal monitoring of likely significant environmental effects of development projects. Mapping of LR important habitats and species as part of the County Biodiversity Plan.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
Landscape & Visual Amenity	L1	Avoid or, minimise impacts to statutory landscape designations defined in the CDP.	<p>Status of Landscape Character Areas, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects.</p> <p>Number of developments consented that result in avoidable adverse impacts on Landscape Character Areas, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects.</p> <p>Number of areas in the local authority functional area designated for their landscape character.</p>	<p>All action and development proposals supported by the plan must comply with policy objectives relating to the protection of Landscape Character Areas, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects defined in the CDP.</p> <p>No development supported by the plan should have an adverse impact on Landscape Character Areas, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects.</p>	<p>Internal monitoring of compliance with CDP Policy Objectives.</p> <p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Review of future iterations of the Landscape Character Assessment.</p>
	L2	Avoid or minimise adverse visual effects on residential receptors or other sensitive visual receptors.	<p>Number of developments consented that result in avoidable adverse visual impacts on residential receptors or other sensitive visual receptors.</p> <p>Number of areas in the local authority functional area designated for their visual amenity.</p>	<p>No development supported by the plan should have a significant adverse visual impact on residential receptors or other sensitive visual receptors.</p> <p>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.</p>	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Review of future iterations of the Landscape Character Assessment.</p>
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)).	<p>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.</p> <p>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.</p>	<p>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.</p> <p>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.</p>	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Consultation with the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media</p> <p>Review of Heritage Plan environmental effect monitoring</p>



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
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. Internal monitoring of length of new sustainable transport routes developed.
	AQN2	Avoid or minimise effects on local air quality.	Number of developments consented that result in avoidable adverse air quality impacts on sensitive receptors. Number of exceedances of ambient air quality standards in the County, as monitored under the EPA's National Ambient Air Quality Monitoring Network. Improvements in air quality status in the county.	No development supported by the plan should have a significant adverse air quality impact on sensitive receptors. All development supported by the plan should adhere to relevant Development Management Standards defined in the CDP relating to the protection of air quality. Minimise ambient air quality standard exceedances in the County.	Internal monitoring of likely significant environmental effects of development projects. Consultation with the EPA. Review of EPA Air Quality Monitoring undertaken in the County. Review of EPA annual 'Air Quality in Ireland' Report
	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.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
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>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.</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>
	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.	<p>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.</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>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.</p> <p>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.</p>	Internal monitoring of likely significant environmental effects of development projects. Consultation with the EPA.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	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 planning 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
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 on 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.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	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. Tonnes of Bulky waste received at Council Waste Management Facilities annually. Tonnes of garden 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.
	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 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.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	CF3	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.
	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 planning consent.	Increase the number of blue and green infrastructure measures included as part of development projects that have been granted planning consent.	Review of granted planning consents.



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