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ENVIRONMENTAL SCIENCE &
PLANNING

LOCAL AUTHORITY CLIMATE ACTION PLAN

Strategic Environmental Assessment Statement

Prepared for:
Offaly County Council



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Strategic Environmental Assessment Statement

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Abstract: Fehily Timoney and Company is pleased to submit this Strategic Environmental Assessment Statement for the Offaly Local Authority Climate Action Plan to Offaly 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

Offaly County Council (OCC) have adopted the Offaly 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)¹. 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'*²

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'*.

¹ 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).

² 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)



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 Guidelines³. 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.

³ 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 Housing, Local Government and Heritage	<p>The Department advised on other biodiversity related plans, policies, objective and guidelines to consider during the plan-making process.</p> <p>The Department welcomed various approaches to the SEA for the LACAP e.g. various SEOs defined for Biodiversity, Flora and Fauna; the proposal to carefully examine the impacts of linear projects on biodiversity; the proposal to consider potential for invasive species spread).</p>	<p>All relevant biodiversity related plans, policies, objectives and guidelines were considered during the carrying out of the SEA.</p> <p>Biodiversity related SEOs have been updated and shaped to reflect the observations of the Department. For example, SEO B5 has been reword to the following text - 'No net contribution to biodiversity losses or deterioration in response to the biodiversity emergency' - which is more measurable and defined and incorporates the idea of compensation for negative impacts to biodiversity which is sometimes unavoidable.</p>



Environmental Authority	Summary on the Scoping Consultation Submission	How was this submission taken into account during the SEA?
	<p>The Department made recommendations in relation to wording and focus of a number of Biodiversity related SEOs (promoting better alignment with the National Biodiversity Action Plan).</p> <p>The Department advised on various other impact assessment related matters, as follows:</p> <ul style="list-style-type: none"> - The potential impact linear infrastructure, including active travel and green infrastructure projects, may have on biodiversity and the water environment. - The potential impact of renewable energy development on biodiversity. - The potential impact of development or activities that may cause nitrogen deposition. - Utilizing Nature Based Solutions for the management of rainwater and surface water runoff. <p>The Department advised that monitoring indicators should be linked back to environmental effects and proposed mitigation measures. They stated that 'SEA monitoring should reflect the nature and level of detail of the LACAP. Monitoring of local-level plans should focus on both local issues (e.g. habitat loss) and particular aspects of larger scale problems that are relevant to the LACAP area'</p> <p>They advised the Plan should be Screened for AA and subject to full AA if necessary. They also recommended consulting AA related guidelines, as appropriate. They advised that cumulative effects of the Plan in combination with other plans and projects should be considered.</p>	<p>Similarly, SEO B4 was updated to consider potential effects of the Plan on non-designated locally important sites (the indicators and targets for this SEO were also updated appropriately).</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 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 activity that would result in nitrogen deposition. Climate action co-benefits including opportunities for utilizing nature-based solutions in development projects were promoted through the environmental mitigation measures defined in the SEA and AA.</p> <p>The SEOs indicators and targets defined in the LACAP SEA Monitoring Programme were shaped to ensure they were appropriately reflective of potential environmental effects (positive and negative) that may arise in the local authority functional area due to the implementation of the Plan.</p> <p>The Plan was subject to AA Screening which determined full AA was required. Full AA was undertaken in parallel with the SEA (using an Integrated Biodiversity Assessment Approach). The suite of environmental mitigation measures defined for the Plan will also serve to prevent significant adverse effects on European sites. The AA considered the cumulative effect of the Plan in combination with other plans and projects on European sites.</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.

Table 2-3 lists the suggested environmental considerations specific to the LACAP Decarbonising Zone.



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 2-4. The principles were incorporated into the plan itself.

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

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

LACAP Action Reference	LACAP Action	Mitigation Measure
G1.2.1	Promote and support carbon adaptation and mitigation policies, objectives and standards of the Offaly County Development Plan 2021-2027, through pre-planning consultation, planning application process and conditions	Promote and support carbon adaptation and mitigation policies, objectives and standards of the Offaly County Development Plan 2021-2027, through pre-planning consultation, planning application process and conditions; having due regard to environmental sensitivities such as European sites, biodiversity, air and water quality.
BE2.1.1	Continue to retrofit local authority social housing stock under the National Retro Fit Programme	Continue to retrofit local authority social housing stock under the National Retro Fit Programme; having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity, and the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations.
BE2.1.3	Upgrade of corporate buildings via Pathway project	Upgrade of corporate buildings via Pathway project, having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity, and the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations.
T3.1.1	Migration of the Offaly County Councils Corporate Fleet to Low Emission fuels(Electric/HVO)	Migration of the Offaly County Councils Corporate Fleet to Low Emission fuels(Electric/HVO) - Whilst ensuring energy/fuel used to power local authority alternative vehicles is sustainably sourced, and appropriate end-of-life management practices are in place for Electric Vehicles.
T3.1.2	Formulation of a County/Regional EV Strategy for the delivery of Zero Emission Electric Vehicle Infrastructure	Formulation of a County/Regional EV Strategy for the delivery of Zero Emission Electric Vehicle Infrastructure, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, and cultural heritage.
T3.2.1	Delivery of the Grand Canal Greenway/Greenways in general and associated Trailheads to facilitate modal shift.	Delivery of the Grand Canal Greenway/Greenways in general and associated Trailheads to facilitate modal shift, having due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, and European sites.



LACAP Action Reference	LACAP Action	Mitigation Measure
T3.2.2	Continued Delivery of the Offaly County Councils Active Travel Programs to facilitate modal shift.	Continued Delivery of the Offaly County Councils Active Travel Programs to facilitate modal shift, having due regard to environmental sensitivities such as traffic and transport constraints and aspects, the receiving water environment, local air quality, biodiversity, and European sites.
T3.4.3	The use of new technologies for weed control and the removal of glyphosate materials.	The use of new environmentally safe technologies for weed control and the removal of glyphosate materials
T3.4.4	The implementation of 'Climate Adaptation Strategy for Regional and Local Roads'	The implementation of 'Climate Adaptation Strategy for Regional and Local Roads', having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, and local air quality.
S6.1.1	Monitor & enforce waste regulations through working with WERLA	Monitor & enforce waste regulations through working with WERLA, while ensuring sustainable transport modes are used to travel to and from inspection sites, where feasible.
NE4.2.4	Ensure all new development is assessed in relation to the requirements of the OPW Guidelines for Planning Authorities - The Planning System and Flood Risk Management	Ensure all new development is assessed in relation to the requirements of the OPW Guidelines for Planning Authorities - The Planning System and Flood Risk Management - whilst having appropriate regard to environmental protection requirements associated with flood resilience development.
NE4.2.5	Assess all new development for the implementation of natural water retention measures	Assess all new development for the implementation of natural water retention measures - whilst having appropriate regard to environmental protection requirements associated with developing drainage related development.
NE4.1.1	Develop and implement an OCC Plan to record, conserve and raise awareness of all aspects of built, natural and cultural heritage in the County. Ensure actions of each plan complement each other	Develop and implement a Heritage Plan to record, conserve and raise awareness of all aspects of built, natural and cultural heritage in the County. Ensure actions of each plan complement each other, 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.
NE4.1.2	Develop and implement a local Biodiversity Action Plan to protect and enhance local biodiversity, including climate relevant measures.	Develop and implement a local Biodiversity Action Plan to protect and enhance local biodiversity, including climate relevant measures, 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.
NE4.1.3	Develop and implement pesticide reduction policy for the County Council	Develop and implement pesticide reduction policy for the County Council - ensuring these substances are only used to a degree that does not cause significant effects on the receiving environment, such as the receiving water environment, biodiversity or European sites.



LACAP Action Reference	LACAP Action	Mitigation Measure
BE2.3.1	Pilot a biodiversity inclusive design for a social housing estate with green roofs, green walls, wetlands & pond SUDS, green carparking, nest boxes in facades, grasslands, and wildlife friendly shrubs and trees in open spaces	Pilot a biodiversity inclusive design for a social housing estate with green roofs, green walls, wetlands & pond SUDS, green carparking, nest boxes in facades, grasslands, and wildlife friendly shrubs and trees in open spaces, ensuring development have due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.
BE2.3.2	Build climate resilience and improve energy performance of architectural and archaeological heritage in public and private ownership through schemes such as BHIS, HSF, HTI, IWTN and Community Monuments Fund.	Build climate resilience and improve energy performance of architectural and archaeological heritage in public and private ownership through schemes such as BHIS, HSF, HTI, IWTN and Community Monuments Fund, having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity, and the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations.
NE4.1.5	Develop integrated programme to address Invasive Alien Species through education and/or selected actions as appropriate. This programme shall be developed by a competent ecology team and shall have due regard to the need to appropriately manage and prevent the spread of invasive species.	Develop integrated programme to address Invasive Alien Species through education and/or selected actions as appropriate. This programme shall be developed by a competent ecology team and shall have due regard to the need to appropriately manage and prevent the spread of invasive species.
NE4.1.6	Commission a county wetland survey and support implementation of recommendations on OCC lands in terms of conservation and restoration works. Recommendations shall be developed by a competent ecology team and shall have 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.	Commission a county wetland survey and support implementation of recommendations on OCC lands in terms of conservation and restoration works. Recommendations shall be developed by a competent ecology team and shall have 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.
NE4.2.1	Prepare strategic wildfire management plan for high-risk areas such as bogs and Slieve Blooms having appropriate regard to the need to support the achievement of conservation objectives and protect and enhance important habitats or the qualifying interests of any protected sites.	Prepare strategic wildfire management plan for high-risk areas such as bogs and Slieve Blooms, having appropriate regard to the need to support the achievement of conservation objectives and protect and enhance important habitats or the qualifying interests of any protected sites.
BE2.3.4	Implement green infrastructure solutions, such as bioswales and permeable pavements, using a multi-disciplinary team to guide planning, installation and monitoring to improve stormwater management and enhance local biodiversity.	Implement green infrastructure solutions, such as bioswales and permeable pavements, using a multi-disciplinary team to guide planning, installation and monitoring to improve stormwater management and enhance local biodiversity, having appropriate regard to local environmental sensitivities such as the receiving water environment, biodiversity European sites and cultural heritage considerations.
C5.1.11	Offaly LCDC will support expressions of interest for funding from community and voluntary groups who are seeking funding to carry out climate action projects through the LEADER Programme	Offaly LCDC will support expressions of interest for funding from community and voluntary groups who are seeking funding to carry out climate action projects through the LEADER Programme, while ensuring funded projects accord with relevant planning and environmental protection criteria.



Table 2-3 Proposed Environmental Mitigation Measures - Integrated Environmental Considerations relating to Decarbonising Zone Opportunities suggested for inclusion in the plan

<p>The opportunities progressed, and any associated activities and development (such as energy, active travel, recreation, waste management, peatland, wetland or water body 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.</p>
<p>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.</p>
<p>The County Council 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.</p>
<p>Any opportunities progressed that support urban regeneration or town or rural renewal, shall have due regard to the need to ensure cultural heritage features, including protected structures, are appropriately conserved.</p>

Table 2-4: Proposed Environmental Mitigation Measures - Environmental Governance Principles suggested for inclusion in the LACAP - specifically the LACAP implementation section

<p>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.</p>
<p>Support or facilitate climate action related projects and initiatives which seek to make improvements in soil structure, management and health by increasing soil organic carbon - which will create the environmental co-benefits of improving flood resilience by enhancing water holding capacity of soils and increasing the level of GHG sequestration associated with land use functions.</p>
<p>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 effect on the receiving environment shall be supported.</p>
<p>Flood defence projects or related maintenance works supported by plan actions 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.</p>
<p>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.</p>
<p>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.</p>
<p>Promote climate action projects that support protected trees, hedgerows and other habitats such as wetlands, flood zones which contribute to green infrastructure.</p>
<p>Support opportunities to improve ecological connectivity of non-designated habitats and sites to improve overall ecosystem resilience and functioning while supporting climate action within the county.</p>
<p>Ensure all projects supported by the council have taken the necessary precautions to identify and manage invasives species, particularly with regard to Schedule III species. No climate action related development project that is likely to cause the spread of invasives species listed in Schedule III shall be supported.</p>
<p>Support opportunities to support peatland restoration, rehabilitation and maintenance while achieving climate targets through the implementation of the climate actions within the plan.</p>



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

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

2.3 Appropriate Assessment

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

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

2.4 Consultation on SEA Environmental Report

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

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



Table 2-3: Responses to Consultation Submissions

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



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	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.	It was noted that Offaly is a non-coastal county which does not have a seafood sector.	None	None
Cian O’Mahony SEA Section Office of Radiation Protection and Environmental Monitoring Environmental Protection Agency	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: Environmental Protection Agency; Minister for Housing, Local Government and Heritage; Minister for Environment, Climate and Communications;	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 hasn’t been done already.	None	None



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Minister for Agriculture, Food and the Marine.</p> <p>If you have any queries or need further information in relation to this submission, please contact me directly at c.omahony@epa.ie. I would be grateful if you could send an email confirming receipt of this submission to: sea@epa.ie.</p>			
	<p>Non-Technical Summary</p> <p>You should ensure that the Non-Technical Summary includes the relevant information as required under Schedule 2 of S.I No. 434 Of 2004, as amended.</p>	<p>It was assumed that SI No. 434 is a typo and SI No. 435 is what was intended to be addressed with this statement.</p> <p>The requirements of Schedule 2 of SI No 435 have been noted and amendments to the NTS will be made as appropriate.</p>	None	The NTS was updated to reflect the relevant information as required under Schedule 2 of SI No 435 of 2004 as amended.
	<p>Relationship with other plans and programmes</p> <p>We acknowledge that the Plan has been prepared taking account of the key National plans including the National Climate Action Plan 2023. We also acknowledge that the Plan sets out the key plans, programmes and policies considered in preparing the SEA.</p> <p>The Plan should include a commitment to remain aligned with high level plans and programmes, Guidelines, and legislation over its lifetime. The Climate Action Plan 2024 is currently being prepared and work will be commencing on the review of the National Planning Framework and Regional Spatial and Economic Strategies also. Any relevant updates of these plans/strategies should be integrated as appropriate into the Plan as relevant and appropriate.</p> <p>The Plan should include a commitment to consider any relevant updated actions, measures or recommendations that may arise in updates to the National Climate Action Plan (or the National Planning Framework) over the lifetime of the Plan.</p>	<p>Noted and agreed. It was noted that this is in reference to the LACAP and not the SEA ER or AA NIR documentation.</p> <p>It was recommended the Council includes a commitment in the Plan to remain aligned with high level plans and programmes if this isn't the case already.</p> <p>It was recommended the plan includes 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>	None	None



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Strategic Environmental Objectives</p> <p>We recommend that in considering strategic environmental objectives, they should where possible reflect the plan being prepared, rather than use more generic environmental objectives. This will help both in considering more specific monitoring and mitigation measures, when required.</p>	<p>Noted. The Strategic Environmental Objectives defined have been very specifically defined to reflect the themes, goals, objectives and climate action contained in the plan and in light of the potential environmental effects associated with Plan implementation.</p>	None	None
	<p>Alternatives</p> <p>We note the alternatives considered in the SEA and acknowledge the preferred option selected.</p>	Noted.	None	None.
	<p>Mitigation Measures</p> <p>Where the potential for likely significant effects has been identified, you should provide appropriate mitigation measures to avoid or minimise these. You should 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> <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 provides a clear commitment to implement these mitigation measures, if this isn't the case already.</p>	None	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Monitoring, Implementation & Reporting</p> <p>The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities</p> <p>If the monitoring identifies adverse impacts during the implementation of the Plan, then you should ensure that suitable and effective remedial action is taken.</p> <p>Guidance on SEA-related monitoring is available on the EPA website at 06695-EPA-SEA-Statements-and-Monitoring-Report.pdf.</p>	<p>The SEA Monitoring Programme established for the LACAP is contained in the SEA ER. This monitoring programme has been developed in accordance with EPA guidelines entitled 'Guidance on SEA Statements and Monitoring' (2020).</p> <p>The monitoring programme is multi-faceted, broad in scope and has been designed to allow for a flexible and adaptive approach to SEA monitoring during Plan implementation.</p> <p>The monitoring programme has been designed to inherently measure cumulative effects that may arise due to the implementation of the Plan.</p> <p>This plan considers both positive and negative effects, as per the following statement from the SEA text:</p> <p>'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.'</p>	<p>None</p>	<p>The SEA monitoring programme was updated to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects arising due to plan implementation, where appropriate.</p> <p>Provide additional detail on monitoring programme data sources</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
		<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 will be updated to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects arising due to plan implementation, where appropriate.</p> <p>The monitoring programme includes detail on the indicators, targets and data sources to be used to monitor and measure progress. Some additional detail on data sources has however been provided to better guide the SEA monitoring to be carried out across plan implementation.</p> <p>A commitment to remedial action in the event SEA monitoring shows the implementation of the Plan is having adverse environmental effects has been made in the SEA.</p>		
	<p>EPA State of the Environment Report</p> <p>Our State of Environment Report, Ireland’s Environment - An Integrated Assessment 2020 (SOER2020) identifies thirteen ‘Key Messages for Ireland’. Delivering Ireland’s long-term sustainable development and environmental objectives will involve many different stakeholders to address these key actions. The report recognises the need for full implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies.</p> <p>The EPA are currently preparing the next iteration of the SOER report, which will be published in 2024. We recommend 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> <p>How environmental considerations have been integrated into the Plan;</p> <p>How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;</p> <p>The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,</p> <p>The measures decided upon to monitor the significant environmental effects of implementation of the Plan.</p> <p>You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.</p>	<p>Noted. An SEA statement has been produced and circulated to any environmental authority consulted during the SEA process.</p>	None	None
	<p>Future Amendments to the Plan</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
Uisce Éireann	<p>We also welcome Offaly County Council’s commitment “to increase use of nature-based solutions and enhance biodiversity in all developments” and to “pilot a biodiversity inclusive design for a social housing estate with green roofs, green walls, wetlands & pond SUDs, green carparking, nest boxes in facades, grasslands, and wildlife friendly shrubs and trees in open spaces”. We would welcome in particular consideration of the following guidance:</p> <ul style="list-style-type: none"> Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document 	<p>Noted. It was recommended that the Council consider the guidance referenced, as appropriate.</p>	None	None



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<ul style="list-style-type: none"> National (Infrastructure) Guidelines and Standards Group recent NGS Circular 1 of 2023, DMURS Advice Note 5 Road and Street Drainage using Nature Based Solutions Design Greening and Nature-based SuDS for Active Travel Schemes - National Transport Guidance for Urban watercourses by Inland Fisheries Ireland. 			
The Department of Housing, Local Government and Heritage	<p>Archaeology</p> <p>The Department of Housing, Local Government and Heritage welcomes the publication of local authority draft Climate Change Adaptation Strategy. The Department draws your attention to the Climate Change Sectoral Adaptation Plan (CCSAP) for Built and Archaeological Heritage (2019) prepared as part of the National Adaptation Framework. The Climate Change Sectoral Adaptation Plan identifies the priority impacts for the built and archaeological heritage based on current climate change projections.</p>	Noted.	Update reports and appendices to account for the contents of the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019).	Update reports and appendices to account for the contents of the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019).
	<p>The Department 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.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	In the preparation and implementation of the local authority adaptation strategy, there are a number of issues regarding protection of built and archaeological heritage that the Department recommends be taken into account to identify the heritage assets at risk in its area, assess their vulnerability to climate change, increase their resilience and develop disaster risk reduction policies for direct and indirect risks. For example, it is recommended that the strategies should consider:	Noted	None.	None.
	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.	It was acknowledged that the SEA scoping report and SEA Environmental Report consider the archaeological heritage assets in the LA including structures and sites subject to statutory protection under the National Monuments Acts 1930 to 2014, and the Planning and Development Acts. They do not, however, provide an exhaustive list of these items. Such a list is provided in Appendix 4 of the County Development Plan which was used to inform this process.	None.	None.
	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 that the LA consider this within the scope of the LACAP as appropriate.	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 that the LA consider this as appropriate.	None.	None.
	Including objectives to develop resilience and adaptation strategies for the built and archaeological heritage in its area.	Noted. It was recommended that the LA consider this as appropriate.	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 LA consider this as appropriate.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	This 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 LA consider this as appropriate. The SEA Environmental Report has defined mitigation measures within the plan to ensure that any retrofitting of buildings including protected structures is carried out in a manner that doesn't impinge on built heritage or protected structures.	None.	None.
	Finally, it is recommended that, where such officers are employed, the Architectural Conservation Officer, Heritage Officer and Archaeologist should be included on the local authority's Adaptation Steering Group.	Noted. It was recommended that the LA consider this as appropriate.	None.	None.
	You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie where used, or to the following address: The Manager Development Applications Unit (DAU), Government Offices, Newtown Road, Wexford Y35 AP90	Noted. It was recommended that the LA consider this as appropriate.	None.	None.
Inland Fisheries Ireland	Nature-based solutions allows polluted runoff be treated close to where the rain falls and can improve the quality of surface water runoff and decrease runoff volumes. They can also help combat the adverse effects of climate change by reducing temperatures at street level in urban areas and reducing volumes of rainfall-runoff which can aid to alleviate flooding issues. The Department of Housing, local Government and Heritage have recently published the following interim guidance document on Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document, which should be considered when designing drainage systems.	The Plan promotes the use of Nature Based Solutions and Sustainable Drainage Systems as ways to promote flood resilience insofar as the Council's remit extends (See H21 for example). It was recommended the local authority has further regard to these comments during plan implementation and when progressing specific development projects.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>It discusses Water Sensitive Urban Design (WSUD), which is an approach to design that delivers greater harmony between the water cycle, the environment, and communities. IFI should be consulted when resolving local flooding issues incorporating Nature Based Solutions. The CAP should include incentives and policies to enhance the uptake of Nature Based Solutions in new private developments. The multifunctional asset value of Nature Based Solutions should be laid out and the extent of the benefits provided be quantified to encourage the use.</p>			
	<p>One of the stated main objectives of the CAP is to climate proof council infrastructure. Road Drainage should ensure adequate attenuation measures are in place and silt and petrol interceptors, constructed wetlands and swales should be employed where appropriate to reduce pollutants from the road entering watercourses. However, these systems only work when they are properly maintained into the future. IFI encourages a commitment by Local Authorities that all roads and pipelines are constructed in such a manner so as not to pose a threat to surface waters either through pollution, loss of fisheries habitat or through interference with the passage of migratory fish species and/or spawning beds. The impacts of poorly designed river/stream crossing structures can be serious in terms of habitat loss. Prevention of the free upstream migration of fish species such as Salmon, Trout and Lamprey effectively results in the loss of spawning habitat upstream of the barrier to migration. This could have serious implications for the populations of fish species concerned and contravenes the legal obligation under the WFD to protect the ecological status of river catchments and channels. When structures are being designed for crossing fisheries waters, consideration must be given to the following biological criteria: species of fish required to safely pass; size of fish required to pass (life stage); time of year in which fish passage is required; and, high and low design passage flows etc.</p>	<p>At policy level, the Plan supports the protection of the water environment from development and activities supported by defined climate action.</p> <p>Several Environmental Governance Principles have been defined in the Plan which promote environmental protection and enhancement, including biodiversity conservation and water quality protection and improvement.</p> <p>Environmental protection considerations have been appropriately integrated into transport, flood and drainage related development and infrastructure maintenance related action defined in the Plan.</p> <p>It was recommended the local authority has further regard to these comments during plan implementation and when progressing specific development projects.</p>	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Bridges and bottomless culverts have the least impact on fish passage. IFI recommends that the CAP should include a clear policy on the use of clear span structures on fisheries waters and that IFI should be consulted on any such proposed developments.</p>			
	<p>There is a zone of influence associated with Greenways/Blueways and these must be considered and planned for in the CAP when promoting active travel.</p> <p>A wildlife corridor system that protects regional diversity should be at the forefront of the Greenway/Blueway planning processes. Fragmentation can occur along riparian corridors if proper planning is not in place. In considering wildlife, the focus should not be solely on the narrow width of the path of the greenway, consider the wider area it may influence such as allowing invasive plant and animal species to spread more easily along the corridor and outcompeting native species.</p>	<p>The Plan supports the protection and enhancement of the biodiversity and water environments from development and activities supported by defined climate action.</p> <p>Several Environmental Governance Principles have been defined in the Plan which promote environmental protection and enhancement, including biodiversity conservation and water quality protection and improvement.</p> <p>Environmental protection considerations have been appropriately integrated into Green Infrastructure development related action defined in the Plan.</p> <p>The Plan promotes the use of Nature Based Solutions and Sustainable Drainage Systems as ways to promote flood resilience.</p> <p>It was noted that SEA Monitoring Framework for the LACAP includes the following Plan target: Increase linear metres of riparian corridor enhanced with native planting.</p> <p>It was recommended the local authority has further regard to these comments during plan implementation and when progressing specific development projects.</p> <p>As a general note, It was recommended the local authority have appropriate regard to all commentary received from IFI when designing, planning for and delivering site specific projects.</p>	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
		Finally, It was noted such development projects will be undertaken in accordance with green infrastructure related policy objectives defined in the Offaly County Development Plan 2021 – 2027.		



2.5 SEA and Plan Modifications

OCC 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 are presented in Table 2-5. No modifications affecting the SEA and AA processes were made upon Plan Adoption.

Table 2-4: Plan Action Modifications

Action	Summary of Modification
All Actions	All actions have been renumbered following their Thematic Areas.
G1.2.2	The following action has been included and reworded: To collaborate with other not-for-profit organisations such as Energy Cloud or similar to investigate measures, technologies and funding streams in order to tackle energy poverty.
G1.4.1	The following action has been included and reworded: Utilisation and promotion of the Data Centre Integration Report.
G1.4.2	The following action has been included and reworded: Implementation of Offaly Economic and Development Strategy, in particular Green Technology.
G1.4.5	The following action has been included: Offaly County Council will continue to utilise and promote the EU Just Transition Funding within the mechanisms of each available pillar and call.
NE4.1.6	The following action has been amended:



Action	Summary of Modification
	Commission a county wetland survey and support implementation of recommendations on OCC lands in terms of conservation and restoration works.
CR5.2.7	The following action has been included and reworded: Engage with and support local IFA, expert, advisors and farmers and the appointed Offaly Teagasc adviser on their climate action signpost programme. Engage with these stakeholders to develop a platform for ongoing periodical consultation.
CE Ref 30. Framework of Actions P41	The following new action has been added to the Plan: Guided by the Memorandum of Understanding signed between the GAA and CCMA, towards working together on sustainability and climate action projects, engage with the Green Club Programme through a nominated lead, working with the CARO and GAA, in the promotion and support of projects by participating clubs, to meet the objectives, and during key phases, of the programme to 2029.
CE Ref 33. Framework of Actions P43	The following new action has been added to the Plan: Offaly County Council will investigate current water usages with a view to identifying and implementing water efficiency measures.
CE Ref 34. Framework of Actions P43	The following new action has been added to the Plan: Offaly County Council to promote a move away from “single use” cups for hot beverages towards “Bring Your Own” and collaborate with relevant stakeholders such as Chambers of Commerce, Tidy Towns, Credit Unions and others to support local businesses to move towards sustainable alternatives i.e. 2GoCup or similar.
CE Ref 35. Framework of Actions P43	The following new action has been added to the Plan: Offaly County Council to collaborate with relevant stakeholders in supporting and promoting local bioeconomy initiatives through existing structures such as Just Transition Fund and others in line with national Bioeconomy Action Plan 2023-2025 and future plans over the life of the LACAP.
G1.1.1	The following action has been included: As leaders on climate action, local authorities will need to demonstrate strong ownership of agreed targets and the capacity to integrate climate action into the core policymaking, prioritisation, and budgetary processes of their organisations.
G1.1.2	The following action has been included: Nominated climate and sustainability champion at senior management level.
G1.2.3	The following action has been included: Collaborate with other Irish signatories to the EU Missions Adaptation to Climate Change on funding applications.
G1.2.4	The following action has been included: Develop a Green Public Procurement Strategy for Offaly County Council.
G1.4.3	The following action has been included: Offaly Library Service will deliver on all Climate Action related targets as outlined in the new National Public Library Strategy 2023-2027, The Library is the Place: Information, Recreation, Inspiration. (Note Appendix 2 for SDG cross referencing).



Action	Summary of Modification
G1.4.4	The following action has been included: Offaly Library Service will deliver on all Climate Action related targets as outlined in future Library Development Plan 2024-2028, in preparation
BE2.1.2	The following action has been included: Conduct energy audits across our corporate buildings as appropriate, using Gap to Target tool to inform energy project implementation.
BE2.1.4	The following action has been included: Assign Energy Engineer to lead energy efficiency projects and campaigns.
BE2.1.6	The following action has been included: Investigate the potential for and funding sources to develop our approach to affordable net zero energy retrofits.
BE2.2.1	The following action has been included: Guided by the Energy Performance of Building Directive (planned for adoption in mid-2023) deploy suitable solar energy installations on all new public and non-residential buildings with a useful floor area over 250m ² by 31 December 2026, on all existing public and non-residential buildings undergoing a major or deep renovation with a useful floor are over 400m ² by 31 December 2027, and on all new residential buildings by 31 December 2029.
BE2.2.2	The following action has been included: Planned and future construction of new corporate buildings to contribute towards achievement of OCC's Climate targets.
BE2.2.4	The following action has been included: Develop a corporate buildings register in line with relevant energy efficiency Directives.
BE2.2.5	The following action has been included: Develop a multi-year implementation plan for IS Department to increase energy efficiencies across the organisation.
BE2.3.3	The following action has been included: Incorporate SUDS/NWRM/NBS in all capital work funding applications.
BE2.4.1	The following action has been included: Address Vacancy & Dereliction - under URDF and Vacancy Property Refurbishment Grant schemes.
BE2.4.2	The following action has been included: Refurbishment of derelict building as greener option than new builds & brown field sites.
BE2.4.3	The following action has been included: Apply for funding under various funding streams to facilitate the regeneration of communities and town / village centres, under the Urban and Rural Regeneration and Development Funds and Town and Village Renewal Schemes.
BE2.4.4	The following action has been included: Vacant/Derelict Properties - Incorporating energy efficient designs into the refurbishment and retrofitting of buildings.



Action	Summary of Modification
T3.2.3	The following action has been included: Provide safe, equitable and accessible infrastructure for pedestrians and cyclists.
T3.2.4	The following action has been included: Acquire the NTA's Smarter Travel Mark. Demonstrate robust communications, policies, facilities, incentives and supports in favour of sustainable commuting and business travel.
T3.2.5	The following action has been included: Encourage the use of sustainable transport modes for essential business-related trips, and provide staff with education, advice and supports to avail of sustainable options for such trips, for example through making Leap cards available for business travel or setting up a business account with a shared mobility provider.
T3.3.1	The following action has been included: Expand Public Transport networks in partnership with public transport operators and large employers.
T3.3.3	The following action has been included: Promote Park and ride facilities and investigate expansion to other areas in the county.
T3.3.4	The following action has been included: Encourage the use of car-pooling / lift-sharing among those employees who have no viable alternatives to travel than via car, e.g., using dedicated carpool parking spaces.
T3.3.6	The following action has been included: Inter-modal transit hubs e.g., accessible interchange stations where passengers can switch modes to continue journeys.
NE4.2.2	The following action has been included: Continued participation on the EU NBS EduWorld project, to enhance NBS knowledge at all education levels.
NE4.2.3	The following action has been included: Explore and encourage innovative technologies to reduce flood and heat risk within urbanised areas.
NE4.2.6	The following action has been included: Provide Council staff with relevant training in NBS solutions.
CR5.1.3	The following action has been included: Conduct a feasibility study for a Church Hill "Climate Park" investigating biodiversity enhancement, community power, river park, rain playground.
C5.1.8	The following action has been included: Offaly Library Service is committed to programming educational events and information sessions promoting awareness of climate action, the environment and sustainable development.
C5.2.3	The following action has been included: Administer Community Climate Action Fund.



Action	Summary of Modification
C5.2.4	The following action has been included: Support Sustainable Energy Communities by way of signed MoU with SEAI regarding the provision of bridge funding.
C5.2.9	The following action has been included: Develop citizen science project with communities on a climate related subject.
C5.3.1	The following action has been included: Support the North Offaly Development Fund to promote Rhode Business Park – 13 serviced sites with access to National Grid and encourage energy companies and companies testing new technologies to avail of the facilities.
C5.3.2	The following action has been included: Support the Junction Business Innovation Centre, Tullamore – Coworking hub for businesses developing Green Energy Technologies, Software and Design businesses.
C5.3.3	The following action has been included: Support Green for Business programme assisting enterprises to improve sustainability in their businesses.
C5.3.4	The following action has been included: Support LEAN Programmes, assisting enterprises to improve efficiencies and reduce waste in their businesses.
C5.3.5	The following action has been included: Local Enterprise Office Offaly are assisting businesses in Offaly to increase their digitalisation via the Digital Start programme, the Trading Online Voucher and the You're the Business scheme. We support Offaly businesses in enabling economic activities to go digital resulting in the reduced need for travel/transport, cutting carbon emissions.
C5.3.6	The following action has been included: Support the vision of Offaly as an alternative to Dublin, promote Offaly as a place offering a work life balance.
C5.3.7	The following action has been included: Offaly Innovation and Design Centre CLG (The Junction, e-Hive and stream BIRR) and Technological University of the Shannon are committed to the development of cooperation opportunities towards the provision of Higher Education programmes in County Offaly.
C5.3.8	The following action has been included: Promoting and Supporting Green Business Practices in County Offaly LEO Offaly to encourage and educate local businesses on adopting sustainable practices such as energy efficiency, waste reduction, and resource conservation. This is done through workshops, training programmes, and providing access to resources and information on ecofriendly practices.
C5.3.9	The following action has been included: Offering Grants and Incentives - LEO Offaly can provide financial support through grants to local businesses to implement climate-friendly measures. This can include funding for energy-efficient equipment, ecofriendly product development and contribution to the circular economy.



Action	Summary of Modification
C.5.3.10	The following action has been included: Offaly Library Service is committed to providing reading materials, collections and resources that support sustainable development and climate action.
S6.1.4	The following action has been included: Seek funding to conduct a Geothermal Mapping Project for all of Offaly to identify potential areas where the use of renewable geothermal heating is economically feasible.
S6.1.5	The following action has been included: Seek funding for a County Wide Energy Master Plan.
S6.1.6	The following action has been included: Investigate the potential for a District Heat Network and smaller neighbourhood district heating schemes.
S6.1.7	The following action has been included: Develop a Sustainable Event guide and policy for implementation for internal OCC and external organisers use.
S6.2.1	The following action has been included: Develop clear and targeted communications campaigns to ensure easy access to information on what can be recycled. Use positive and engaging messages that will resonate with citizens (e.g., cost savings, sustainability and job creation).
S6.2.3	The following action has been included: Provide funding support and collaboration as per signed SLA with Kildare County Council to the Scientific Assessment of Alternatives to Herbicide Use in the Maintenance of Amenity Public Open Space project.
S6.2.4	The following action has been included: Increase water fountains across the County to reduce single use plastic waste.
S6.3.1	The following action has been included: Develop portal on internal intranet to Reuse internal resources and goods wherever possible.



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 DLACAP 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.

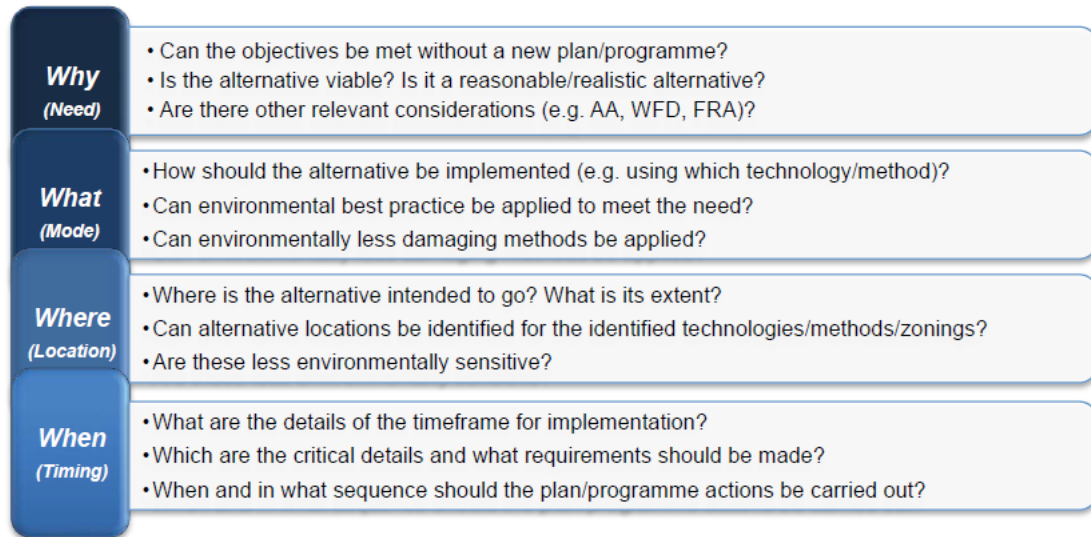


Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3 Developing and Assessing Alternatives in the Strategic Environmental Assessment Process (EPA, 2015).

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 result 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



5. SEA MONITORING

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

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

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

OCC 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 Climate Action section of Offaly 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. Require that all development projects in the County appropriately align and accord with action defined in the Plan.	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 complies with policies protective/supportive of economic 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 ² /length metres).	No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the CDP. Ensure no habitats are impacted by the effects of climate change. Ensure no reduction in the number of geographic distribution of species as a result of climate change effects.	Internal monitoring of compliance with CDP Policy Objectives. Internal monitoring of compliance with the County Biodiversity Action Plan. Internal monitoring of likely significant environmental effects of development projects.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
			<p>Number and geographical distribution of Species or Species population trends impacted by climate change.</p> <p>Compliance of action and development supported by the plan with policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the County's Biodiversity Action Plan.</p>	<p>No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the County's Biodiversity Action Plan.</p> <p>Planning consent for development proposals supported by the plan only to be granted where development complies with policy supporting biodiversity protection and enhancement.</p>	
	B2	Ensure compliance with Habitats and Birds Directives with regard to protection of European Sites and Annexed habitats and species ⁴ .	Condition of European Sites and annexed species.	No adverse impacts on the condition of European Sites and Annexed habitats and species as a result of plan implementation.	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Consultation with the NPWS.</p> <p>Department of Housing, Local Government and Heritage report on the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive.</p> <p>Department of Housing, Local Government and Heritage's National Birds Directive Monitoring Report for the Birds Directive under Article 12.</p> <p>Review of NPWS publications regarding the status of European sites.</p>

⁴ '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
	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 steppingstones (designated or not) - are of major importance for wild fauna and flora and essential for the migration, dispersal and genetic exchange of wild species.	<p>Condition of features of the landscape which - by virtue of their linear and continuous structure or their function as steppingstones (designated or not) - are of major importance for wild fauna and flora.</p> <p>Linear meters of riparian corridors enhanced with native planting.</p> <p>Fragmentation or breaks in continuity of habitats and loss of wildlife corridors, steppingstones and connectivity (km²).</p> <p>Number of developments permitted that have significant greenspace proposals.</p>	<p>No adverse impacts on the condition of features of the landscape which - by virtue of their linear and continuous structure or their function as steppingstones (designated or not) - are of major importance for wild fauna and flora as a result of plan implementation.</p> <p>Increase linear metres of riparian corridor enhanced with native planting.</p> <p>Reduce habitat fragmentation or breaks.</p> <p>Increase number of developments permitted that have significant greenspace proposals.</p>	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Mapping of LR important habitats and species as part of the County Biodiversity Action Plan.</p>
	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.	<p>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.</p>	<p>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.</p>	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Mapping of LR important habitats and species as part of the County Biodiversity Action Plan.</p>
	B5	No net contribution to biodiversity losses or deterioration in response to the biodiversity emergency.	<p>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.</p> <p>No. of developments permitted that have significant greenspace proposals.</p> <p>Improved biodiversity areas (Area km² /length metres).</p>	<p>No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the CDP.</p> <p>Increase number of developments permitted that have significant greenspace proposals.</p> <p>Increase quantum of improved biodiversity areas.</p>	<p>Internal monitoring of compliance with CDP Policy Objectives.</p> <p>Internal monitoring of compliance with the County Biodiversity Action Plan.</p> <p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Mapping of LR important habitats and species as part of the County Biodiversity Action Plan.</p>



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



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
Cultural Heritage - Archaeology & Architectural	CH1	Avoid impacts upon archaeological heritage (including entries to the Record of Monuments and Places (RMP)) and architectural heritage (including entries to the Record of Protected Structures (RPS) and National Inventory of Architectural Heritage (NIAHs)).	<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>
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.	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Consultation with Geological Survey of Ireland and review of published data on the soils environment.</p>
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.	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Review of Land Use, Land Use Change and Forestry related Greenhouse Gas emissions calculated in the Baseline Emission Inventory.</p>
Air Quality and Noise	AQN1	Increase the number of people travelling to work or school via public transport or by non-mechanical means.	<p>% change in modal split.</p> <p>Length of new sustainable transport routes developed.</p>	<p>Reduction in private car use.</p> <p>Extension and improvement of the sustainable transport network in the plan area.</p>	<p>Central Statistics Office (CSO) Population data - Commuting in Ireland.</p> <p>Internal monitoring of length of new sustainable transport routes developed.</p>



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	AQN2	Avoid or minimize effects on local air quality.	<p>Number of developments permitted that result in avoidable adverse air quality impacts on sensitive receptors.</p> <p>Number of exceedances of ambient air quality standards in the County, as monitored under the EPA's National Ambient Air Quality Monitoring Network.</p> <p>Improvements in air quality status in the county.</p>	<p>No development supported by the plan should have a significant adverse air quality impact on sensitive receptors.</p> <p>All development supported by the plan should adhere to relevant Development Management Standards defined in the CDP relating to the protection of air quality.</p> <p>Minimize ambient air quality standard exceedances in the County.</p>	<p>Internal monitoring of likely significant environmental effects of development projects. Consultation with the EPA.</p> <p>Review of EPA Air Quality Monitoring undertaken in the County.</p> <p>Review of EPA annual 'Air Quality in Ireland' Report.</p>
	AQN3	Avoid or minimize adverse noise impacts.	<p>Number of sensitive receptors exposed to noise nuisance.</p>	<p>No sensitive receptors exposed to nuisance noise in the County.</p>	<p>Internal monitoring of likely significant environmental effects of development projects. Monitoring of internal noise complaint investigations undertaken. Consultation with the EPA.</p>
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>



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



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



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	MAI5	Promote sustainable water use and drainage management.	Level of water use in the County. Compliance with Sustainable Drainage System (SuDs) related development management standards defined in the CDP.	Reduced water use in the county. All development (supported by the plan) must comply with SuDs related development management standards defined in the CDP.	CSO water consumption data. Internal monitoring of flood risk associated with of development projects and development project compliance with relevant flood risk and management related development management standards.
Tourism & Recreation	TR1	Avoid or minimise effects upon tourism and recreation amenities.			
Climate Change	CF1	Delivery of the necessary action to support the national target of 80% electricity from renewable sources by 2030.	Level of Greenhouse Gas (GHG) emissions in the County. Level of renewable energy infrastructure in the County.	Reduce GHG emissions associated with the Energy sector in the County. Increase the level of renewable energy infrastructure in the County.	EPA National Emission Inventory. Baseline Emission Inventory for the County. Megawatt hour (MWh) output from renewable energy infrastructure in the county.
	CF2	Actively support the delivery of all national climate policy as appropriate to the county with the prioritisation and acceleration of evidence-based measures.	Level of GHG emissions in the County	Reduce GHG emissions for all sectors in the County.	EPA National Emission Inventory. Baseline Emission Inventory for the County.
	CF3	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 Decarbonizing 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 Decarbonizing Zone.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	CF4	Deliver a Decarbonising Zone (DZ) within the local authority area to act as a test bed for a range of climate mitigation and adaptation measures in a specifically defined area through the identification of projects and outcomes that will assist in the delivery of the National Climate Objective.	Level of GHG emissions in the Decarbonising Zone.	Reduce Decarbonising Zone GHG emissions to Net Zero.	Baseline Emission Inventory for the Decarbonizing 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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