



CONSULTANTS IN ENGINEERING,  
ENVIRONMENTAL SCIENCE &  
PLANNING

# LOCAL AUTHORITY CLIMATE ACTION PLAN

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## Strategic Environmental Assessment Statement

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**Prepared for:**  
Leitrim County Council



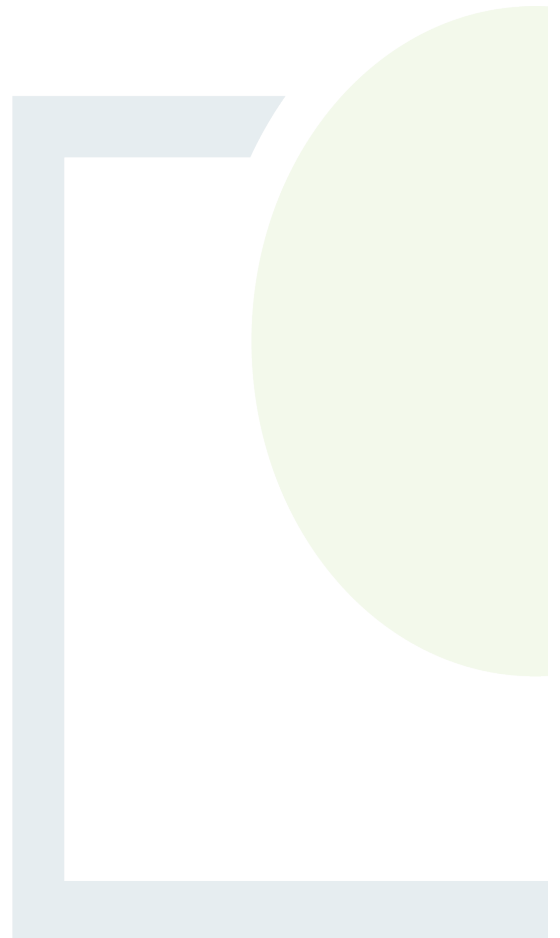
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## Strategic Environmental Assessment Statement

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

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

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

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

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

### 1.2 Legislative Context

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

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

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

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

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



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



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

### 2.1 SEA Scoping

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

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

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

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



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

Environmental Authority	Summary on the Scoping Consultation Submission	How was this submission taken into account during the SEA?
Department of Agriculture, Food and the Marine	An overview on how climate resilience could be promoted in agriculture setting was provided (e.g., maintaining a fodder reserve, measures to promote biodiversity and carbon sequestration, measures to improve soil structure and function). An overview on invasive species risk associated with climate change and the need for appropriate need to promote resilience was provided	The content of this submission served to inform the focus of the environmental assessment of agriculture related action defined in the LACAP. It informed the nature and focus of mitigation measures defined for related climate mitigation and adaptation action defined in the LACAP. A number of Environmental Governance principles defined in the LACAP specifically reflect the recommendations contained in this submission.
EPA	<p>An overview of the nature of climate change challenges was provided. The EPA acknowledged the nature, focus and goals of the emerging LACAP was made. It was advised the SEA should seek to maximize climate action co-benefits for air quality, human health, biodiversity, water quality and other interrelated areas (i.e. win-win solutions).</p> <p>Other measures advised on which were relevant to the SEA included: the need to consider the Plan influence on Greenhouse Gas (GHG emissions) the need to manage climate change influenced invasive species spread, the need to have regard to the receiving water quality and air quality environment during the plan-making process.</p> <p>In relation to the SEA specifically, commentary was provided on the approach to mitigation, and on how the plan should consider impacts on air and water quality, water resource, soils/geology, landscape and material assets.</p> <p>The EPA recommended integrating the environmental mitigation defined under the SEA into the Plan, and advised on other interrelated plans and programmes to consider during plan-making and SEA processes.</p>	<p>The recommendation to ensure climate action defined in the Plan created co-benefits underpinned the SEA process and the defined mitigation measures. Where relevant, mitigation measures ultimately defined serve to holistically maximize environmental benefits. The promotion of climate action co-benefits is embedded into the Environmental Governance Principle framework defined for the Plan.</p> <p>Appropriate regard was had to the need to consider the climate change influenced invasive species spread. This was considered when shaping defined climate action and also within the Environmental Governance principle framework defined under the Plan.</p> <p>The receiving water and air quality environmental were appropriately considered and evaluated during the SEA process, in light of the EPA's commentary on baseline water quality and air quality data and information.</p> <p>The nature, focus and level of mitigation measures defined in the SEA Environmental Report were informed by the EPA's commentary. All mitigation measures defined were integrated into the Plan itself. The wording of climate action defined in the Plan was shaped having regard to relevant environmental considerations. A set of Environmental Governance Principles were included in the Plan.</p>
Department of Housing, Local Government and Heritage	The Department referenced the need for the local authority to consider the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) prepared as part of the National Adaptation Framework. The Climate Change Sectoral Adaptation Plan (CCSAP) identifies the priority impacts for the built and archaeological heritage based on current climate change projections.	<p>All commentary from the Department was considered during the Plan development process.</p> <p>The Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage has been considered in the Plan Inter-relationship analysis carried out under the SEA and AA.</p>





Environmental Authority	Summary on the Scoping Consultation Submission	How was this submission taken into account during the SEA?
	<p>The Department advised on a number of issues regarding protection of built and archaeological heritage that the local authority should consider:</p> <ul style="list-style-type: none"> <li>Identifying the built and archaeological heritage assets in the local authority area.</li> <li>Including objectives to carry out climate change risk assessments, including condition assessments, for the historic structures and sites in its area.</li> <li>Including objectives to develop disaster-risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area.</li> <li>Including objectives to develop resilience and adaptation strategies for the built and archaeological heritage in its area.</li> <li>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.</li> </ul> <p>They further advised they will shortly be publishing a new guidance document <i>Improving Energy Efficiency in Traditional Buildings</i>.</p>	<p>The local authority has had appropriate regard to the Department's commentary in preparing its climate adaptation related actions, and will have regard to the Department advice during plan implementation, and the carrying out of retrofitting projects in particular.</p> <p>Environmental mitigation has been incorporated into the plan to ensure development and activities supported by the Plan does not adversely affect archaeology or cultural heritage.</p>
DAFM Seafood	<p>DAFM note that Commercial sea fishing is a long standing, pre-existing and traditional activity in the marine environment. They note that the Seafood Industry is experiencing a period of difficult change and that there is an ever-increasing demand on the marine space from offshore renewable energy, marine spatial planning, marine protected areas, and other environmental issues. Coastal communities continue to play a significant role in contributing to climate goals through the Sectoral Adaptation Plan and the Climate Action Plan, both of which should be considered during the SEA process. 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. They implore Local Authorities to include relevant steps to support Just Transition for sea fisheries and aquaculture in their climate action plans.</p>	<p>The content of this submission served to inform the focus of the environmental assessment and mitigation measures for of any marine-related action defined in the LACAP.</p>



## 2.2 Environmental Assessment and Mitigation

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

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

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

### 2.2.1 Mitigation through consideration of alternatives

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

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

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

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

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

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



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

**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
GL19	Enhancement of emphasis on development of social housing on sites near town centres and local facilities.	Attach the following text to the action: <b>Ensure any supported development is planned in a manner that has due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites and cultural heritage.</b>
GL24	Adopt a cloud technology first approach to reduce the volume of energy used by physical servers and ancillary infrastructure such as cooling systems.	Attach the following text to the action: <b>Steps will be taken to ensure the cloud provider chosen has sustainability- and carbon-goals that align with the overall objective of this plan.</b>
B1	Deliver the Leitrim Pathfinder Programme and pursue other national and regional funding sources for retrofitting and improving energy efficiency and reducing emissions.	Attach the following text to the action: <b>Promote the need to adhere to environmental protection requirements during retrofit projects, including the need to appropriately conserve built heritage.</b>
B5	Deliver the Public Lighting Energy Efficiency Project in County Leitrim as part of PLEEP Scheme to reduce GHG emissions and energy usage of Public Lighting.	Attach the following text to the action: <b>Ensure potential actions maintain/control or reduce existing lumen levels and spectral range to avoid effects on biodiversity.</b>
B7	Endeavour for all new council public buildings to be built to Net Zero Standards as far as practicable.	Attach the following text to the action: <b>having due regard for environmental sensitivities that may be affected by retrofitting works or development, including built heritage, sensitive human receptors and biodiversity.</b>
B8	Use Gap to Target (GTT) Tool to inform decisions and continue retrofitting council owned buildings to reduce emissions such as Electricity, Thermal and Transport and improve energy efficiency.	Attach the following text to the action: <b>having due regard for environmental sensitivities such as local human receptors, European sites and biodiversity; and the need to appropriately protect and conserve built-heritage.</b>
B9	Facilitate and support the upgrade of existing vacant & derelict residential and commercial properties in Carrick-on-Shannon Town and County through schemes such as Town centre First	Attach the following text to the action: <b>Having due regard for environmental sensitivities such as local human receptors, European sites and biodiversity; and the need to appropriately protect and conserve protected structures, during any retrofitting works.</b>
B13	Ensure all Leitrim County Council new build social houses meet minimum A2 Building Energy Rating standard to reduce GHG emissions and Energy consumption	Attach the following text to the action: <b>;having due regard to environmental sensitivities that may be affected by supported development, including landscape and visual sensitivities, sensitive human receptors and biodiversity.</b>
B14	Continue retrofitting and upgrading works of existing social housing units to BER B2 rating to reduce GHG emissions, and energy consumption	Attach the following text to the action: <b>,while having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity.</b>



LACAP Action Reference	LACAP Action	Mitigation Measure
B17	<p>Leitrim County Council will seek to prioritise the delivery of Catchment Flood Risk Assessment and Management (CFRAM) Programme identified flood schemes in the county and promote nature-based solutions and integral to these schemes</p> <p>Prioritise CFRAMS identified flood schemes in Leitrim, priorities:</p> <ol style="list-style-type: none"> <li>1. CoS -planning, CoS – construction</li> <li>2. LV – Planning, LV – construction</li> <li>3. Mohill -feasibility study, works dependent on outcome</li> <li>4. Dromod -feasibility study, start dependent on Cos &amp; LV</li> <li>5. Dromahaire FRS planning</li> </ol>	<p>Attach the following text to the action:</p> <p>in accordance with technical, financial and environmental requirements.</p>
B19	Pursue maintenance funding for works on local flooding areas	<p>Attach the following text to the action:</p> <p>ensuring the plan takes nature-based solutions and protection of biodiversity into consideration.</p>
B23	Develop a formal routine gulley maintenance and cleaning plan to ensure that programmes are in place in all towns and villages prone to flooding and that all gully's are cleaned in advance of the Autumn and Winter seasons. Pursue funding for same.	<p>Attach the following text to the action:</p> <p>Ensure the plan takes nature-based solutions and protection of biodiversity into consideration.</p>
B28	Continue to roll out Active-Travel infrastructure maximising available funding from National Transport Authority (NTA).	<p>Attach the following text to the action:</p> <p>having due regard to opportunities to enhance tourism, recreation and cultural heritage value associated with active travel routes, and environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites, and cultural heritage related sensitivities.</p>
B30	Progress the delivery of Greenway / Blueway infrastructure in line with National Cycle Network (NCN). Priority projects at present include: 75km Greenway Sligo Leitrim Northern Counties Railway (SLNCR), 10km Blueway Carrick Carrick-on-on-Shannon to Hartley, 26km Cavan Leitrim Railway Greenway Dromod to Ballinamore, Drumshambo to Ballinamore.	<p>Attach the following text to the action:</p> <p>having due regard to opportunities to enhance tourism, recreation and cultural heritage value associated with the routes, and environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites, and cultural heritage related sensitivities.</p>
B31	Increase the number of safe routes to school schemes in the county. Promotion of schemes and engagement with Boards Management	<p>Attach the following text to the action:</p> <p>having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality and cultural heritage.</p>
B33	Engage with Smart and Sustainable Mobility Accelerator (SSMA) programme to increase knowledge, competencies, and understanding of sustainable and smart mobility supporting the implementation of the National Sustainable Mobility Policy (NSMP) goals and those outlined in the Pathfinder programme.	<p>Attach the following text to the action:</p> <p>having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.</p>



LACAP Action Reference	LACAP Action	Mitigation Measure
B34	Develop a Regional EV Strategy for County Leitrim in association with Lead Local Authority & implement actions/recommendation as identified.	Attach the following text to the action: <b>having due regard to the need to ensure disabled access to EV charging infrastructure and environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.</b>
B35	Develop a fleet management strategy ensuring alignment to the Leitrim CAP. Evaluate annual mileage of LA grey fleet and associated carbon emissions.	Reword the action to as follows: Develop a fleet management strategy ensuring alignment to the Leitrim CAP <b>and sustainability principles</b> . Evaluate annual mileage of LA grey fleet and associated carbon emissions.
B37	Undertake a decarbonisation strategy for local authority fleet in line with guidance from CCMA, LGMA and SEAI activating the Avoid – Shift – improve model working to the aim of 51% emission reductions by 2030. Implement a road map towards decarbonisation for the LA Fleet.	Reword the action to as follows: Undertake a decarbonisation strategy for local authority fleet in line with guidance from CCMA, LGMA and SEAI activating the Avoid – Shift – improve model working to the aim of 51% emission reductions by 2030. Implement a road map towards <b>sustainable</b> decarbonisation for the LA Fleet.
B40	Purchase EVs as replacement fleet vehicles where suitable, and where available on the market, in line with decarbonisation strategy, whilst ensuring energy/fuel used to power local authority alternative vehicles is sustainably sourced.	Attach the following text to the action: <b>Ensure appropriate end-of-life management practices are in place for local authority owned Electric Vehicles.</b>
B41	Replacement of fuel type for HGV fleet with HVO when the technology and products become available	Reword the action as follows: Replacement of fuel type for HGV fleet with <b>sustainably sourced and certified HVO that delivers lifecycle GHG emission reductions</b> when the technology and products become available.
B46	Develop, adopt & implement Local Transport Plans for Carrick-on-Shannon with an emphasis on the promotion of sustainable transport modes and modal shift	Attach the following text to the action: <b>having due regard to climate action co-benefit/biodiversity enhancement opportunities and environmental sensitivities that may be impacted by active travel projects.</b>
B48	Design and implement a transportation mobility plan and land-use transportation plan for Carrick-on-Shannon	Attach the following text to the action: <b>having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage, and the need to promote sustainable transport.</b>
N4	Consider a Green Infrastructure Strategy including a green infrastructure network for the County that incorporates ecology, climate change mitigation and adaptation, to increase climate resilience, climate action co-benefits and environmental protection requirements.	Attach the following text to the action: <b>Ensure such a strategy promotes climate action co-benefits and adherence to planning and environmental protection requirements.</b>
N8	Development and Implementation of a SUDS policy and continue the prioritisation of SUDS measures in Local Authority projects ensuring the plan takes nature-based solutions / protection of biodiversity and avoidance of habitat fragmentation into consideration.	Attach the following text to the action: <b>Ensure this policy promotes nature-based solutions where appropriate and has due regard to environmental protection requirements.</b>



LACAP Action Reference	LACAP Action	Mitigation Measure
N9	Develop an awareness raising campaign for the management of hedgerows and implement recommendations from hedgerow appraisal survey where appropriate.	Reword this action to the following: Develop an awareness raising campaign for the management of <b>native</b> hedgerows and implement recommendations from hedgerow appraisal survey where appropriate.
N10	Encourage implementation of biodiversity aspects in new and existing social housing estates where possible e.g., green roofs, green walls, wetland and pond SUDS, reed bed waste water filtration, green car parking, nest boxes in facades, grasslands, and wildlife-friendly shrubs and trees in open spaces	Attach the following text to the action: <b>having appropriate regard to relevant planning and environmental protection criteria.</b>
N12	Promote the integrated planning, design and delivery of green infrastructure (including urban greening) through appropriate provisions in planning policies, development standards, infrastructural, public realm and community projects	Attach the following text to the action: <b>having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality and cultural heritage.</b>
N15	Develop and implement a pesticide use reduction policy for Leitrim County Council.	Attach the following text to the action: <b>The policy shall also ensure pesticides are only used in accordance with good environmental practice, and only to a degree that does not cause significant effects on the receiving environment, such as the receiving water environment, biodiversity or European sites.</b>
CRT9	Investigate and utilise funds that provide for cycle routes within schools, community facilities, sports and youth clubs	Attach the following text to the action: <b>having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.</b>
SR9	Progress the authorisation and subsequent of remediation of historical landfill sites previously controlled by Leitrim County Council.	Attach the following text to the action: <b>Ensure such remediation projects are properly designed and planned and do not cause unintended negative environmental effects.</b>
SR16	Promotion of diversification in sustainable food production through the economic and enterprise remit. Highlight positive benefits of locally grown food.	Reword this action to the following: Promotion of <b>sustainable</b> diversification in sustainable food production through the economic and enterprise remit. Highlight positive benefits of <b>sustainably sourced</b> locally grown food.
SR20	Provide technical supports to farming enterprises in the development of biomethane from Anaerobic Digestion, including guidance on planning and environmental protection requirements.	Attach the following text to the action: <b>having due regard to environmental sensitivities that may be affected by the construction and operation of Anaerobic Digestion systems (e.g., water quality, air quality, biodiversity, European sites).</b>
SR21	Support and promote the Signpost Advisory Programme to support climate and sustainability actions on farms	Attach the following text to the action: <b>having due regard to environmental sensitivities in the area such as European Sites, water quality, air quality, and biodiversity related sensitivities.</b>



LACAP Action Reference	LACAP Action	Mitigation Measure
SR23	Renewable Electricity to be developed in accordance with Leitrim County Councils Renewable Energy Strategy (RES) and the National Renewable Electricity Spatial Policy Framework, to support sustainable development of renewable electricity.	Attach the following text to the action: <b>Promote the proper planning and sustainable development of renewable energy and ancillary grid infrastructure.</b>
SR24	Support safe, secure, reliable electricity grid infrastructure within the County to support renewable electricity generation, reinforcement, strengthening and integration of the transmission network to allow linkages with renewable electricity proposal consistent with RES.	Attach the following text to the action: <b>Promote the proper planning and sustainable development of renewable energy and ancillary grid infrastructure.</b>
SR25	Support local community-based renewable energy projects and new micro-generation and small-scale generation renewable energy projects.	Attach the following text to the action: <b>Promote project adherence to planning and environmental protection requirements.</b>
<b>Decarbonising Zone</b>		
DZBE1	Retrofit social housing and local authority buildings in the Carrick-on-Shannon DZ to achieve a minimum Building Energy Rating of B2.	Attach the following text to the action: <b>Having due regard for environmental sensitivities such as local human receptors, European sites and biodiversity; and built heritage conservation requirements, during any retrofitting works.</b>
DZBE2	Assess the feasibility and install rooftop solar PV on social housing and local authority property across the Carrick-on-Shannon DZ	Attach the following text to the action: <b>having due regard to local human receptors, protected species, biodiversity, European sites and the need to appropriately conserve protected structures.</b>
DZBE3	Install rooftop solar PV on social housing and local authority property across the Carrick-on-Shannon DZ	Attach the following text to the action: <b>having due regard to local human receptors, protected species, biodiversity, European sites and the need to appropriately conserve protected structures.</b>
DZBE4	Promote retrofit to Building Energy Rating B2 for private and commercial properties across the Carrick-on-Shannon DZ	Attach the following text to the action: <b>Having due regard for environmental sensitivities such as local human receptors, European sites and biodiversity; and built heritage conservation requirements, during any retrofitting works.</b>
DZBE6	Consider suitability for solar canopies at LCC car parks	Attach the following text to the action: <b>having due regard to environmental sensitivities such as landscape character and visual amenity, local human receptors, protected species, biodiversity, and European sites.</b>
DZBE8	Utilise available funding to carry out flood protection works and promote the use of Nature-based Solutions (NbS) to reduce the impact of flooding	Attach the following to the action: <b>having due regard to the need to promote nature-based solutions and Sustainable Drainage Systems, and environmental sensitivities at and in the vicinity of water bodies, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.</b>
DZBE10	Improve the energy efficiency of Leitrim County Council historic buildings within the DZ	Attach the following text to the action: <b>having due regard to the built and natural heritage conservation requirements, and the need to not negatively impinge on any protected species.</b>



LACAP Action Reference	LACAP Action	Mitigation Measure
DZBE11	Complete a Town Centre First Plan for Carrick-on-Shannon and implement recommendations.	Attach the following text to the action: having due regard to protected species, biodiversity, European sites and the need to appropriately conserve protected structures.
DZT1	Implement the decarbonisation of the Local Authority vehicular fleet as appropriate.	Attach the following text to the action: Ensure energy/fuel used to power local authority alternative vehicles is sustainably sourced, and appropriate end-of-life management practices are in place for local authority owned Electric Vehicles.
DZT2	Undertake an Active Travel study to identify and prioritise the most effective measures	Attach the following text to the action: ensuring the study has appropriate regard to planning and environmental protection constraints and considerations.
DZT5	Identify suitable locations for EV charging points across the Carrick-on-Shannon DZ	Attach the following text to the action: having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, and cultural heritage.
DZT7	Engage with the relevant authorities to support the electrification of Local Link	Attach the following text to the action: Promote - through control or influence as appropriate - the consideration of sustainability and environmental protection requirements during the design, planning and development of this project.
DZT8	Promote, support & incentivise cycling/walking bus for schools within DZ area.	Attach the following text to the action: having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality, and cultural heritage.
DZT9	Increase pedestrianised space in Carrick-on-Shannon to encourage active travel	Attach the following text to the action: having appropriate regard to environmental sensitivities such as traffic and transport constraints and aspects, the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.
DZT13	Install cycle routes within 1.5km of all schools, community facilities, sports/ youth clubs in line with Safe Routes to School programme	Attach the following text to the action: having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality and cultural heritage.
DZNGI1	Develop a green infrastructure masterplan for Carrick-on-Shannon to coordinate planning for and enhancement of the natural environment, biodiversity and green areas	Attach the following text to the action: having due regard for environmental protection considerations and opportunities for climate action co-benefits.
DZNGI4	Support the creation of public and connected green spaces and wildlife corridors in Carrick-on-Shannon to enhance health and wellbeing and biodiversity	Attach the following text to the action: having due regard for planning and development policy and environmental protection considerations during the masterplanning and development process.
DZNGI5	Support green infrastructure and nature-based solutions such as sustainable urban drainage systems to improve climate resilience	Attach the following text to the action: having due regard to environmental sensitivities including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.





LACAP Action Reference	LACAP Action	Mitigation Measure
DZNGI6	Promote rain-water harvesting, reuse of grey water and green roofs and walls.	Attach the following text to the action: <b>Having due regard for environmental sensitivities such as local human receptors, European sites and biodiversity; and built heritage conservation requirements, during any retrofitting works.</b>
DZNGI9	Develop and implement a pesticide reduction policy for Carrick on Shannon in line with All Island Pollinator Plan.	Attach the following text to the action: <b>The policy shall also ensure pesticides are only used in accordance with good environmental practice, and only to a degree that does not cause significant effects on the receiving environment, such as the receiving water environment, biodiversity or European sites.</b>
DZCRT6	Hold an annual event to promote retrofitting of private buildings and increase community understanding of climate action	Amend the action as per text below: Hold an annual event to promote <b>appropriate</b> retrofitting of private buildings and increase community understanding of climate action.
DZSRM1	Upgrade all public lighting in Carrick-on-Shannon to Light Emitting Diode (LED) lights to improve energy efficiency	Attach the following text to the action: <b>while ensuring the lumen levels and spectral range are maintained or reduced/controlled to avoid effects to biodiversity.</b>
DZSRM5	Support the development of sustainable and circular economy infrastructure	Attach the following text to the action: <b>whilst ensuring such infrastructure is appropriately located and designed, and operates in accordance with the provisions of the Waste Management Act or Industrial Emissions related legislation, and in a manner that does not cause negative environmental impacts or localized nuisance.</b>
DZSRM8	Undertake a feasibility study of the potential for district heating for Carrick-on-Shannon	Attach the following text to the action: <b>ensuring this study has appropriate regard to planning and environmental protection considerations.</b>
DZSRM10	Undertake a feasibility study on the potential for Anaerobic Digestion (AD) in the vicinity of Carrick-on-Shannon utilising waste resources to produce biomethane.	Reword the action to the following: Undertake a feasibility study on the potential for Anaerobic Digestion (AD) <b>at an appropriate location</b> in the vicinity of Carrick-on-Shannon utilising waste resources to produce biomethane. <b>Ensure this study has appropriate regard to planning, waste management and environmental protection related considerations.</b>
DZSRM11	Assess the potential for utilising the Shannon River to produce renewable electricity	Attach the following text to the action: <b>carefully considering all environmental sensitivities and protection requirements related to such a project during this assessment.</b>



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

Promote climate action projects that support and maximise environmental co-benefits, such as biodiversity protection and enhancement; improved air, water or soil quality; or enhanced recreation, amenity and cultural heritage value, to ensure win-win benefits are gained.
Support or facilitate climate action related projects and initiatives which seek to make improvements in soil structure, management and health by increasing soil organic carbon - which will create the environmental co-benefits of improving flood resilience by enhancing water holding capacity of soils and increasing the level of GHG sequestration associated with land use functions.
Ensure local authority development underpinned or supported by plan actions is planned and implemented in a manner that appropriately considers the potential for environmental co-benefits, potential environmental impacts and environmental protection requirements. No local authority climate action related development project that is likely to have significant negative effects on the receiving environment shall be supported.
Promote - through control or influence as appropriate - the carrying out of flood resilience measures underpinned by plan actions in a manner that supports climate action-biodiversity related co-benefits, and which has due regard for the protection and enhancement of rare, protected or important habitats and species.
Promote the carrying out of climate action related projects supported by the plan in a manner that supports climate action-cultural heritage co-benefits, and which has due regard to cultural, archaeological or architectural features and sensitivities.
Promote the carrying out of climate action related projects underpinned by the plan in a manner that supports climate action water quality co-benefits, the achievement of Water Framework Directive objectives, and the protection and maintenance of physical habitat and hydrological processes/regimes.
Promote climate action projects that support protected trees, hedgerows and other habitats such as wetlands, floodzones which contribute to green infrastructure.
Support opportunities to improve ecological connectivity of non-designated habitats and sites to improve overall ecosystem resilience and functioning while supporting climate action within the county.
Ensure local authority projects supported by plan actions have taken the necessary precautions to identify and manage invasives species, particularly with regard to Schedule III species. No local authority climate action related development project that is likely to cause the spread of invasives species listed in Schedule III shall be supported.
Support opportunities to promote peatland restoration, rehabilitation and maintenance while achieving climate targets through the implementation of the climate actions within the plan.

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

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

**2.3 Appropriate Assessment**

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



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

## 2.4 Consultation on SEA Environmental Report

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

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



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

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
Historic Environment Division	DfC Historic Environment Division (HED) operate via a Service Level Agreement with colleagues in DAERA in relation to SEA, whereby we provide authoritative comment and advice in relation to matters of Cultural Heritage including archaeological and architectural heritage. We make the following comments in respect of the documentation received by our office on 6 December 2023.	Noted.	None.	None.
	<p>Given the intertwined nature of the historic environment with landscape and the natural environment, HED advise that consideration of the potential for transboundary impacts in the Cultural Heritage topic area, particularly with regard to potential impacts on setting of assets would be relevant. A large number of heritage assets predate the border itself and correlate to other assets in either jurisdiction, with interweaving views and settings, and some assets such as ancient earthworks (e.g. the Black Pig's Dyke, which is mentioned in the document)traverse it. We also consider that there are inter-relationships between the water and cultural heritage topic areas given the locations of many wetland, lakeland and riverine heritage assets some of which are dependent on stable hydrological conditions for their preservation.</p> <p>In terms of consideration of potential measures and mitigation of such transboundary effects we advise that Northern Ireland's historic environment digital datasets might be utilized during future assessments or at project specific level to further understand potential for impacts, including those on setting of heritage assets. Historic Environment Digital Datasets Department for Communities (<a href="https://communities-ni.gov.uk">communities-ni.gov.uk</a>) We also attach a link to our historic environment map viewer Historic Environment Map Viewer Department for Communities (<a href="https://communities-ni.gov.uk">communities-ni.gov.uk</a>).</p>	<p>It was noted that all effects of the plan have been evaluated, including transboundary effects. Mitigation measures have been adopted to ensure that the environmental effects are controlled at the source.</p> <p>It was recommended the local authority consult Northern Ireland's historic environment digital datasets when progressing development projects, as appropriate.</p>	None.	The SEA ER updated to include a clear statement on transboundary effects, explaining how they are considered and mitigated. Additional information on the NI baseline historic environment will be provided.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Datasets specific to Northern Ireland’s marine historic environment, including around wrecks and reported losses can be obtained through contacting <a href="mailto:colin.dunlop@daera-ni.gov.uk">colin.dunlop@daera-ni.gov.uk</a></p> <p>We also take this opportunity to signpost our resources on Heritage and Climate Change   Department for Communities (<a href="http://communities-ni.gov.uk">communities-ni.gov.uk</a>), as we work in partnership with others who manage the historic environment, including through a North South Memorandum of understanding on Climate Action and Cultural Heritage.</p>	Noted.	None.	None.
Uisce Éireann	<p>Uisce Éireann are developing sustainability plans for implementation with particular focus on energy efficiency, climate change, circular economy, supply chain, biodiversity, collaboration, integrated catchment management, social responsibility and innovation. The consequences of climate change for our planet are far reaching, with significant impacts on water resources and infrastructure. Sustained periods of low rainfall and warm temperature may impact our ability to sustainably abstract and supply water. In addition, reduced flows in receiving waters due to extended dry periods, will reduce the available assimilative capacity for treated wastewater. Climate change will also result in more intense rainfall and greater frequency of storm events. This will result in more frequent flooding due to the capacity of the wastewater network being exceeded and greater environmental impacts from storm water overflows. While this will bring the need for more investment to ensure climate resilient water services, we also believe that it is important that national and local policy supports and promotes the widespread adoption of blue-green infrastructure in our towns and cities together with innovative nature-based solutions. In this regard we welcome Leitrim County Council’s commitment to</p> <p><i>“Consider a Green Infrastructure Strategy including a green infrastructure network for the County that incorporates ecology, climate change mitigation and adaptation, to increase climate resilience, climate action co- benefits and environmental protection requirements.</i></p>	Noted.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p><i>Ensure such a strategy promotes climate action co-benefits and adherence to planning and environmental protection requirements"</i></p> <p>We also welcome the Council's commitment to <i>"Promote the integrated planning, design and delivery of green infrastructure (including urban greening) through appropriate provisions in planning policies, development standards, infrastructural, public realm and community projects, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage".</i></p> <ul style="list-style-type: none"> <li><i>"Develop a green infrastructure masterplan for Carrick-on-Shannon to coordinate planning for and enhancement of the natural environment, biodiversity and green areas, having due regard for environmental protection considerations and opportunities for climate action co-benefits".</i></li> </ul>			
	<p><b>Sustainable Urban Drainage and Integrated Urban Wastewater Management Plans</b></p> <p>Widespread adoption of blue-green infrastructure in towns and cities would take pressure off the combined sewer and storm sewer networks, contribute to climate resilience, improve water quality, provide more livable spaces and also generate capacity for compact growth as set out in the National Planning Framework. To maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted by Uisce Éireann. The removal of stormwater from combined sewers using Sustainable Urban Drainage Systems and Green-Blue Infrastructure in new developments, and retrofitted in existing developed areas, is strongly encouraged. We welcome the Council's commitment to "Support green infrastructure and nature-based solutions such as sustainable urban drainage systems to improve climate resilience, having due regard to environmental sensitivities including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value".</p>	Noted.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>We also welcome the Council’s commitments below</p> <ul style="list-style-type: none"> <li>• “Continue the prioritisation of SuDS measures in road and transportation projects”</li> <li>• “Development and implementation of a SUDS policy and continue the prioritisation of SuDS measures in Local Authority projects ensuring the plan takes nature-based solutions / protection of biodiversity and avoidance of habitat fragmentation into consideration”.</li> <li>• “Encourage implementation of biodiversity aspects in new and existing social housing estates where possible e.g. green roofs, green walls, wetland and pond SUDS, green car parking, nest boxes in facades, grasslands, and wildlife-friendly shrubs and trees in open spaces having appropriate regard to relevant planning and environmental protection criteria”.</li> </ul>			
	<p>We would welcome in particular consideration of the following guidance when considering nature-based solutions and sustainable urban drainage:</p> <ul style="list-style-type: none"> <li>• Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document</li> <li>• National (Infrastructure) Guidelines and Standards Group recent NGS Circular 1 of 2023,</li> <li>• DMURS Advice Note 5 Road and Street Drainage using Nature Based Solutions Design</li> <li>• Greening and Nature-based SuDS for Active Travel Schemes - National Transport</li> <li>• Guidance for Urban watercourses by Inland Fisheries Ireland.</li> </ul>	<p>It was recommended that the Council consider the guidance referenced, as appropriate, during Plan implementation.</p>	<p>None</p>	<p>None</p>
	<p>We would also like to highlight that the recast Urban Wastewater Treatment Directive (UWWTD), as proposed, includes requirements for the preparation of Integrated Urban Wastewater Management Plans (IUWWMPs) for all agglomerations above 100,000p.e. and for selected agglomerations between 10,000 and 100,000p.e. based on risk.</p>	<p>Noted.</p>	<p>None</p>	<p>None.</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>IUWWMPs must include both wastewater and urban runoff drainage systems and therefore in the context of Ireland they will need to be integrated plans for assets owned by Uisce Éireann (wastewater network) and the Local Authorities (storm water network). The recast UWWTD includes obligations for the reduction of pollution load from both wastewater and storm water systems (Storm Water Overflows (SWOs) and Urban Runoff respectively). If adopted, the new UWWTD will require collaboration between UÉ and LAs on integrated drainage planning.</p> <p><b>Water Demand</b></p> <p>The National Water Resource Plan (NWRP) gives us a framework to understand and address how much and where water is required over time, so that we are ready and flexible whatever the future holds. We are analysing potential climate risk scenarios and embedding our findings into our high-level decision making and assessing the risk to water and wastewater services from climate change and forming plans for climate resilience.</p> <p>UÉ is implementing a Climate Risk and Resilience Assessment project on all its new and existing assets to ensure that the impact of climate change is considered against the performance of our assets during their design lifetime. The outcome of this vulnerability assessment informs climate adaptation plans to ensure that the risk of climate change is mitigated as far as reasonably practical.</p> <p>The NWRP, has a 3-pillar approach of: Lose less, Use Less and Supply Smarter. We aim to Supply Smarter by improving the quality, resilience and security of our supply through infrastructure improvements, operational improvements and development of new sustainable sources of water. We aim to lose less water by reducing the amount of water lost through leakage. In addition, we aim to use less by encouraging everyone to use less water in our everyday lives, improving water efficiency in our homes, businesses, farms and through our own operations.</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>





Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Reducing customer water use will not only reduce the pressure on the public water supply system but will also reduce carbon emissions associated with water treatment and supply.</p> <p>Research from the UK indicates that 6% of the UKs total greenhouse gas emissions are from household water supply and use and 90% of these emissions are from how water is used in the home. This equates to over 2.6 kg CO2e per home per day. A 20% reduction in household water use could lead to a carbon emission reduction of up to 0.45 kg-Co2 per property per day. Reduction in water usage will also result in a reduction of wastewater discharged to the sewer network.</p> <p>Water efficiency should mirror existing efforts related to energy and incorporate but not be limited to reduction in demand, water reuse and location of industry in suitable locals to facilitate process water reuse from one industry to another. We welcome the Council’s commitment to <i>“Implement an awareness campaign to educate the public on climate change mitigation and adaptation measures including the circular economy, promotion biodiversity, water conservation and carbon reduction initiatives. Promote various funding streams and grants to assist homes, communities and businesses to implement positive climate actions”</i> and to <i>“Promote greater community and business engagement on climate action, circular economy, energy, water conservation, sustainable mobility and biodiversity through the Community Climate Action Officer, Climate Team and support tools to enable the required behaviour change.”</i>.</p> <p>Having a greater water use efficiency of potable water will help achieve carbon emission targets as well as protect the natural resource in some areas which may be vulnerable.</p>			
	<p><b>Energy Efficiency</b></p> <p>Energy efficiency improvement is a key sustainability measure to help ensure water and wastewater services are resilient to climate change and for developing a low greenhouse gas (GHG) emitting water and wastewater service.</p>	Noted.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Uisce Éireann accounts for 21% of public sector electricity consumption and is by far the largest consumer of electricity in the public sector. We are therefore focused on improving energy efficiency in asset design, upgrades, lighting and heating, transport and process, as well as on renewables such as PV, wind and biogas, and focusing on reducing demand (Use Less), particularly in the context of the current energy crisis. We have made significant progress on our journey to become an energy efficient, low carbon, sustainable water utility. We have achieved improvements of over 30% in our energy efficiency.</p> <p>We are developing plans to move towards net zero carbon, including further development of renewable energy sources on our assets, delinking energy use from greenhouse gas emissions. We welcome the council's commitments to feasibility studies for district heating.</p> <p>We welcome the Council's commitment to "Undertake a feasibility study of the potential for district heating for Carrick-on-Shannon, ensuring this study has appropriate regard to planning and environmental protection considerations". We welcome the opportunity to explore potential collaboration in relation to district heating where heat recovery from the wastewater network and wastewater treatment plants could potentially become a heat source for district heating.</p>			



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p><b>Circularity &amp; Bioeconomy</b></p> <p>Circularity and bio-economy initiatives have significant potential in supporting GHG emission reductions. We are progressing numerous initiatives taking a circular economy model for the management of our sludges, as they provide a sustainable source of precious finite materials. The sludge provides an alternative/complement to current raw materials being used. We view our water sludge as a valuable resource, particularly in the context of the circular economy model. From a starting point of nearly 70% of water sludge going to landfill, we have reached a milestone of almost 90% of our water sludge now going to circular economy outlets. In line with a key objective of our National Wastewater Sludge Management Plan, we have implemented Anaerobic Digestion processes at most of our larger sites, which enables energy recovery from biogas. We consider advanced anaerobic digestion followed by reuse of the residual biosolids on land to be the most sustainable solution for wastewater sludge treatment and disposal. Uisce Éireann are eager to collaborate with others in leveraging circularity opportunities to support the development of a sustainable bioeconomy model.</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>
	<p><b>Potential impacts on Uisce Éireann Water Sources &amp; infrastructure</b></p>	<p>Noted. The potential effects on material assets have already been considered and mitigated against under the SEA process to date. Environmental Governance Principle 3 for example provides for the protection of the environment, including the material asset environment, during the planning and carrying out of all development supported by defined climate action.</p> <p>Notwithstanding this, it was suggested the Plan provides a more express commitment to not adversely impact Irish Water assets in response to this submission. Further, it is recommended the Council have appropriate regard to this submission when commencing and advancing project level development supported by the defined climate actions.</p>	<p>None.</p>	<p>None.</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>We request that any development associated with the climate action plan including e.g. renewable energy have due regard for, and not adversely impact, existing, planned or reasonably foreseeable water sources or Uisce Éireann infrastructure. Uisce Éireann will engage via the planning process for such developments in its role as statutory consultee. Developers requiring connections should have regard to available capacity and should engage with UÉ via our New Connections process. Planned public realm and transport projects have the potential to impact on Uisce Éireann assets and projects e.g. tree planting, building over of assets, new connections, stormwater separation, requirement to programme upgrade works in advance of road project. We would also request that any development in the vicinity of Uisce Éireann assets (including e.g. tree planting) should be in accordance with our Standard Details and Codes of Practise, and Diversion Agreements will be required where an Uisce Éireann asset is diverted or altered. Early engagement in relation to planned projects is requested to ensure public water services and resources are protected, enable Uisce Éireann to plan works accordingly and ultimately minimise disruption to the public.</p>			
DHLGH	<p><b><u>Nature Conservation</u></b></p> <p>Slowing water loss from uplands &amp; peatlands is a key aspect in mitigations against future flooding.</p> <p>This includes:</p> <ul style="list-style-type: none"> <li>• Increasing water storage capacity on peatlands through drain blocking.</li> <li>• Minimising the creation of new drains in wetland habitats to that, which is necessary.</li> <li>• Increasing native woodland cover in suitable areas for water absorption.</li> <li>• Reducing erosion via improved vegetative cover.</li> </ul>	<p>Noted. A variety of Plan-level mitigation measures have been defined under the SEA for the Plan to promote utilizing nature based solutions to manage water run-off and improve flood resilience. This mitigation is in harmony with peatland protection related action defined in the Plan. The Plan expressly promotes the planting of native trees and hedgerows.</p>	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>In addition, the education &amp; training of Council engineers, ground staff and contractors on the best practices for biodiversity enhancement along hedgerows and wildlife corridors (including riparian zones) is a crucial aspect in reducing biodiversity loss and improving water retention.</p>	<p>It was recommended that Council consider this, as appropriate, either for inclusion within the Plan, or during Plan implementation.</p>	<p>None.</p>	<p>None.</p>
	<p>Excessive flailing, cutting and other clearance works can have a limiting or negative impact on the biodiversity resilience in such habitats. Any planned council works and engineering projects that involve vegetation clearance/tree felling should have a method statement in place that clearly sets out the actions to be used that incorporate the minimisation of such impacts.</p>	<p>Noted. The Council should have regard to this submission when planning, designing and carrying out such works during projects and activities.</p>	<p>None.</p>	<p>None.</p>
	<p>In relation to the protection of designated habitats, engineering projects and maintenance works in Special Areas of Conservation should always incorporate an Appropriate Assessment (AA) screening and method statement in how to avoid damage to the qualifying interests of those sites, with the provision of appropriate training for staff and/or contractors in that regard. In the theme of climate change, this can relate to the integrity of aquatic ecosystem health and function.</p>	<p>Noted. The Council should have regard to this submission when planning, designing and carrying out such works during projects and activities.</p>	<p>None.</p>	<p>None.</p>
	<p>In addition, the spread of invasive species such as Japanese Knotweed and Himalayan Balsam is also continuing to occur and needs to be targeted more effectively.</p>	<p>Noted. The Council should have regard to this submission when planning, designing and carrying out such works during projects and activities.</p> <p>It is noted that the following Environmental Governance Principle has been defined within the Plan for the purpose of preventing invasive species spread:</p> <p>EGP9 – ‘Ensure local authority projects supported by plan actions have taken the necessary precautions to identify and manage invasives species, particularly with regard to Schedule III species. No local authority climate action related development project that is likely to cause the spread of invasives species listed in Schedule III shall be supported.’</p>	<p>None.</p>	<p>None.</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p><b>Built Heritage &amp; Archaeology</b></p> <p>In the preparation and implementation of the local authority adaptation strategy, there are a number of issues regarding protection of built and archaeological heritage that the Department recommends be taken into account to identify the heritage assets at risk in its area, assess their vulnerability to climate change, increase their resilience and develop disaster risk reduction policies for direct and indirect risks. For example, it is recommended that the strategies should consider:</p>	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.	The SEA scoping report and SEA Environmental Report identify the built and archaeological heritage assets in the LA including structures and sites subject to statutory protection under the National Monuments Acts 1930 to 2014, and the Planning and Development Act (as amended). Exhaustive detail on built and archaeological heritage is held on record by the local authority and provided in the Country Development Plan already.	None.	None.
	Including objectives to carry out climate change risk assessments, including condition assessments, for the historic structures and sites in its area	Noted. It was recommended the local authority consider this commentary.	None.	None.
	Including objectives to develop disaster-risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area	Noted. It was recommended the local authority consider this commentary.	None.	None.
	Including objectives to develop resilience and adaptation strategies for the built and archaeological heritage in its area.	Noted. The Plan defines action that will improve the climate resilience of architectural and archaeological heritage within the local authorities remit.	None.	None.
	Developing the skills capacity within the local authority to address adaptation/mitigation/emergency management issues affecting heritage assets in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works.	Noted. It was recommended that the local authority consider this as appropriate.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	The Department will shortly be publishing a new guidance document Improving Energy Efficiency in Traditional Buildings. This guidance will assist retrofitting installers and specifiers in how best to choose and apply energy efficiency measures to the historic building stock. The guidance is also intended to assist building owners and occupants in making decisions about upgrading their buildings, many of which are of architectural heritage significance. It is recommended that all proposed retrofitting projects undertaken or supported by the local authority to buildings of traditional construction should follow the principles and practice set out in that guidance	Noted. It was recommended that the local authority consider this as appropriate. The SEA Environmental Report has defined mitigation measures within the plan to ensure that any retrofitting of buildings including protected structures is carried out in a manner that doesn't impinge on built heritage or protected structures.	None.	None
	Finally, it is recommended that, where such officers are employed, the Architectural Conservation Officer, Heritage Officer and Archaeologist should be included on the local authority's Adaptation Steering Group.	Noted. It was recommended that the LA consider this as appropriate.	None.	None.
	You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: referrals@npws.gov.ie	Noted. It was recommended that the LA consider this as appropriate.	None.	None.
Mella O'Brolchain	With regard to the following Environmental Governance Principles defined in the Plan: EG3: 'Ensure local authority development underpinned or supported by plan actions is planned and implemented in a manner that appropriately considers the potential for environmental co-benefits, potential environmental impacts and environmental protection requirements. No local authority climate action related development project that is likely to have significant negative effects on the receiving environment shall be supported.' The consultee asked the following: 'What about business development projects? Could that be added in here?'	The local authority has full control over its own development. It does not have the remit to 'ensure' all development, including private development, is planned in such a fashion. As a local planning authority, it is responsible for granting consent to applications for certain development projects made to it. The framework for environmental protection for such development projects is provided for separately in the County Development Plan.	None.	None.
	With regard to the following Environmental Governance Principles defined in the Plan:	The Environmental Governance Principles have been defined for the purpose of ensuring development and activities supported by climate action defined in the Plan are managed in an environmentally appropriate manner.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>EG9: No Local Authority climate action related development project that is likely to cause the spread of invasives species listed in Schedule III shall be supported.</p> <p>The consultee asked the following:            ‘again, what about development that is not related to climate action? it is mentioned later on so can it be put in here?’</p>	The management of invasive species during development projects generally is provided for separately under the County Development Plan.		
DAFM	<p>Climate change is and will continue to have a significant impact on Agriculture and Land Use in Ireland. Adaptation and Mitigation are key areas of focus for the Department of Agriculture Food and the Marine (DAFM). Adaptation is the process of adjustment to actual or expected climate change and its effects, while mitigation focuses on measures to cut or prevent the emission of greenhouse gases - limiting the magnitude of future warming. DAFM has a significant role in the drafting of the national Climate Action Plan, which lays out a number of actions for both mitigation and adaptation in the Agriculture and Land Use Land Use Change and Forestry sectors.</p>	Noted.	None	None
	<p>Pasture based livestock production dominates Irish agriculture and our agriculture sector has a reputation for high quality and sustainably produced food. Maintaining and verifying that reputation is an imperative for our agri-food industries. Ireland is already well placed through the success of the Origin Green programme and can maintain and build on this competitive advantage, provided changes are made over the years ahead to enhance the sector’s environmental credentials. On the mitigation side a number of actions have been taken to reduce the use of chemical fertilizers and promote the uptake of protected urea, these measures will impact on nitrous oxide emissions. Further improvements in efficiency, including reducing the age at slaughter and the age of first calving will reduce GHG emissions. New targets for organic farming and tillage production will have further significant impact on GHG emission from Agriculture.</p>	Noted.	None	None





Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Further diversification options will also be available through the development of a national biomethane strategy and the construction of an Anaerobic Digestion industry, which will not only benefit the Agriculture sector, but will also have a significant impact on emission from the Energy sector. The DAFM Forest Strategy offers an opportunity to farmers to engage in forestry creation at all scales from tree planting as part of the Agri-Climate Rural Environment Schemes to large scale planting and native woodland creation.</p>	Noted.	None	None
	<p>The national Climate Action Plan contains a number of actions that will reduce GHG emissions, however there will also be significant benefit to biodiversity and enhance adaptation.</p>	Noted.	None	None
	<p>In relation to adaptation and the potential effects of climate change on Agriculture, there are a number of measures that can be applied to build resilience, many of which can also have benefits from a mitigation perspective. Maintaining a fodder reserve on farm can address the effects of longer and wetter winters as well as poorer weather conditions in spring at the start of the grazing season. The Teagasc advisory service and private Agricultural Consultants are available to provide the appropriate advice to farmers. Diversification in agricultural systems will increase resilience of farms to climate change and reduce the economic risk. Changes in climate can encourage an increase in exotic pests and diseases including invasive species - which would have a negative impact on biodiversity if measures to promote resilience are not put in place. Equally, warmer and wetter climatic conditions encourage increased disease pressure in livestock, for instance an increased prevalence of liver fluke.</p>	Noted.	None	None



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Creating further resources to harbour and restore biodiversity improve resilience to climate change. The planting of trees and forestry can contribute to carbon sequestration, and biodiversity by providing a more diverse ecosystem to build resilience. Improvements in soil structure, management and health by increasing soil organic carbon will enhance water holding capacity beneficial for drought conditions as well as high rainfall events. Peatland restoration will also improve water holding capacity as well as water quality.</p>	<p>Noted. The following Environmental Governance Principle has been defined in the Plan:</p> <p>EG2: ‘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>	None	None
	<p>As Local Authorities continue to finalise their 5 year Climate Action Plans, DAFM would request that the above policies, strategies and measures be taken into consideration to ensure that Ireland’s reduction targets for agriculture and land use are fully supported. DAFM remains available to support Local Authorities in the development of their CAPs and other agriculture related items.</p>	<p>Noted. These policies etc. are referenced within the Plan appropriately.</p>	None	None
EPA	<p>You should also consider taking into account the EPA’s ‘Climate Change in the Irish Mind’ project in finalising the Plan. This research is part of the National Dialogue on Climate Action.</p> <p>We suggest that the Plan include a specific action to carry out “implementation monitoring” to ensure that progress achieving the actions and measures across the Plan is being monitored and reported on. The SEA should also assist in identifying ways to maximise the potential co-benefits of</p> <p>climate-related measures for air quality, human health, biodiversity, water quality and other interrelated areas (i.e. win-win solutions)</p>	<p>Noted and agreed. It was noted that the Draft SEA Environmental Report (ER) has defined Environmental Governance Principles and action amendment suggestions to ensure climate action co-benefit opportunities are maximized. Various defined mitigation measures serve to promote win-win solutions.</p>	None.	None.
	<p>We recommend that the findings of the SEA ER and NIS are fully reflected in the Plan, to ensure that the relevant recommendations are fully considered and integrated as appropriate.</p>	<p>Noted and agreed. Environmental mitigation measures in the form of Environmental Governance Principles and climate action amendment suggestions have been fully integrated into the Plan itself.</p>	None	None



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p><b>Environmental Authorities</b> Under the SEA Regulations, you should consult with:</p> <ul style="list-style-type: none"> <li>• Environmental Protection Agency;</li> <li>• Minister for Housing, Local Government and Heritage;</li> <li>• Minister for Environment, Climate and Communications;</li> <li>• Minister for Agriculture, Food and the Marine.</li> </ul> <p>If you have any queries or need further information in relation to this submission, please contact me directly at c.omahony@epa.ie. I would be grateful if you could send an email confirming receipt of this submission to: sea@epa.ie.</p>	<p>Noted. All listed Environmental Authorities have been consulted with as part of the SEA process.</p> <p>It was recommended the Council confirm receipt of this submission with Cian O' Mahony, if this hasn't been done already.</p>	None	None
	<p><b>Non-Technical Summary</b></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	Updated the NTS to reflect the relevant information as required under Schedule 2 of SI No 435 of 2004 as amended.
	<p><b>Relationship with other plans and programmes</b></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>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
	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><b>Strategic Environmental Objectives</b></p> <p>We recommend that in considering strategic environmental objectives, they should where possible reflect the plan being prepared, rather than use more generic environmental objectives. This will help both in considering more specific monitoring and mitigation measures, when required.</p>	Noted. The Strategic Environmental Objectives defined have been very specifically defined to reflect the themes, goals, objectives and climate action contained in the plan and in light of the potential environmental effects associated with Plan implementation.	None	None
	<p><b>Alternatives</b></p> <p>We note the alternatives considered in the SEA and acknowledge the preferred option selected.</p>	Noted.	None	None.
	<p><b>Mitigation Measures</b></p> <p>Where the potential for likely significant effects has been identified, you should provide appropriate mitigation measures to avoid or minimise these. You should also ensure that the Plan includes clear commitments to implement the relevant mitigation measures.</p>	<p>The SEA produced recommended a suite of mitigation measures in response to climate actions considered to have potentially significant environmental effects.</p> <p>Environmental Governance Principles have been defined for the purpose of underpinning and framing the defined climate actions. All activities and development supported by the defined climate actions shall be undertaken or influenced by the local authority, as appropriate, in accordance with these Environmental Governance Principles.</p> <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><b>Monitoring, Implementation &amp; Reporting</b></p> <p>The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities. If the monitoring identifies adverse impacts during the implementation of the Plan, the you should ensure that suitable and effective remedial action is taken. Guidance on SEA-related monitoring is available on the EPA website at <a href="https://www.epa.ie/publications/monitoring--assessment/assessment/strategicenvironmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf">https://www.epa.ie/publications/monitoring--assessment/assessment/strategicenvironmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf</a></p>	<p>The SEA Monitoring Programme established for the Draft LACAP is contained in the SEA ER. This monitoring programme has been developed in accordance with EPA guidelines entitled 'Guidance on SEA Statements and Monitoring' (2020).</p> <p>The monitoring programme is multi-faceted, broad in scope and has been designed to allow for a flexible and adaptive approach to SEA monitoring during Plan implementation.</p> <p>The monitoring programme has been designed to inherently measure cumulative effects that may arise due to the implementation of the Plan.</p> <p>This plan considers both positive and negative effects, as per the following statement from the SEA text:</p> <p><i>'Where monitoring identifies that the implementation of the LACAP is having a significant negative environmental effect, an in-depth review of the LACAP should take place and the LACAP should be updated in a manner that satisfactorily mitigates these environmental effects (i.e., through the adoption of additional environmental mitigation measures.). Similarly, where monitoring indicates that potential positive environmental effects associated with LACAP implementation are not being adequately realized, the LACAP should be reviewed and updated in a manner that supports the realization of all potential positive environmental effects, having regard to the overall vision and high-level objectives of the plan.'</i></p> <p>It is 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>None</p>	<p>Updated the SEA monitoring programme to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects, where appropriate 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
		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><b>EPA State of the Environment Report</b></p> <p>Our State of Environment Report, Ireland’s Environment - An Integrated Assessment 2020 (SOER2020) identifies thirteen ‘Key Messages for Ireland’. Delivering Ireland’s longterm 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. 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
	<p>SEA Statement – “Information on the Decision”</p> <p>Once the Plan is adopted, you should prepare an SEA Statement that summarises:</p> <ul style="list-style-type: none"> <li>• How environmental considerations have been integrated into the Plan;</li> <li>• How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;</li> <li>• The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,</li> <li>• The measures decided upon to monitor the significant environmental effects of implementation of the Plan.</li> </ul> <p>You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.</p>	<p>Noted. An SEA statement will be produced and circulated to any environmental authority consulted during the SEA process.</p>	None	None



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p><b>Future Amendments to the Plan</b></p> <p>You should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan</p>	Noted.	None	None
DAERA	<p><b>General Comments</b></p> <p>DAERA are largely content with the conclusions of the SEA Environmental Report and Natura Impact Statement. However, we note that DAERA was not consulted at the SEA Scoping Stage of the Plan. Within Section 7.2 of the environmental report, it states that the evaluation considers transboundary effects. However, the report does not include any environmental baseline information or detailed transboundary considerations in relation to Northern Ireland, we therefore assume all mitigation and monitoring measures outlined in the report will also apply to Northern Ireland. However, if this is not the case then a clear assessment of transboundary issues is required. We encourage continued engagement and co-ordination with NI.</p>	It is noted that all effects of the plan have been evaluated (inclusive of effects that may be transmitted via environmental pathways to Northern Irish receptors). Mitigation measures have been adopted to ensure that the environmental effects of Plan Action are controlled at the source. The environmental assessment reports will be updated to include a greater level of detail on the Northern Irish baseline environment and to demonstrate more expressly how transboundary effects were considered and mitigated.	The NIR was updated to demonstrate more expressly how transboundary effects were considered and mitigated.	The SEA ER was updated to demonstrate more expressly how transboundary effects were considered and mitigated.
	<p>We welcome the proposed monitoring and mitigation to prevent, reduce and offset significant environmental impacts and provided it will be applied to transboundary cases and engagement with NI continues we are content. DAERA would however recommend that the monitoring programme detailed within Section 9 and Table 9-1 would benefit from the inclusion of Northern Irish data sources, indicators and targets to ensure that the environment within Northern Ireland is also protected. Useful sources of data for this are located at the following hyperlinks:  <a href="https://www.daera-ni.gov.uk/publications/state-environment-report-2013">https://www.daera-ni.gov.uk/publications/state-environment-report-2013</a>  <a href="https://www.daera-ni.gov.uk/publications/northern-ireland-environmental-statistics-report-2023">https://www.daera-ni.gov.uk/publications/northern-ireland-environmental-statistics-report-2023</a></p>	Noted and agreed.	None.	Northern Irish data sources, indicators and targets were also consulted and included in the report, where appropriate.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	DAERA would have preferred the SEA environmental report to contain a clear statement indicating the opinion about whether the implementation of the plan is likely to have a significant effect on Northern Ireland, in combination with any identified measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment.	It was noted that all effects of the plan have been evaluated, including transboundary effects. Mitigation measures have been adopted to ensure that the environmental effects of Plan Action are controlled at the source.	None.	The SEA ER was updated to include a clear statement on transboundary effects, explaining how they are considered and mitigated.
	<b>Natural Environment Division (NED) Comments</b> NIEA Natural Environment Division works to ensure that Northern Ireland's special natural environment, including its flora and fauna and landscapes, is conserved, enhanced and managed for the benefit of this and future generations, thereby contributing to sustainable development.	Noted.	None.	None.
	<b>SEA Environmental Report</b> While the plan is confined to Ireland NED welcome that transboundary issues for the natural environment / heritage has been recognised within the SEA and NIS. NED note that in Section 7.2 of the environmental report it states that the evaluation considers transboundary effects. NED notes that the environmental report does not contain a specific section on the consideration of transboundary effects on Northern Ireland. Therefore, the ER would benefit from specific consideration of transboundary issues although we assume that the report has assessed transboundary issues within the assessment for the Leitrim area and the same conclusions apply. However, if this is not the case then a clear assessment of transboundary issues is required. We encourage continued engagement and co-ordination with NI.	It was noted that all effects of the plan have been evaluated, including transboundary effects. Mitigation measures have been adopted to ensure that the environmental effects of Plan Action are controlled at the source.	The NIR was updated to demonstrate more expressly how transboundary effects were considered and mitigated.	The SEA ER was updated to demonstrate more expressly how transboundary effects were considered and mitigated.
	We recommend further engagement with relevant Departments/Bodies within NI and when required assessment of transboundary impacts and possibly further Environmental assessment and /or HRA at planning/project level.	Noted.	None	None.
	NED notes from Appendix 1 that a number of pieces of legislation and policy documents have not been included,	Noted.	Northern Irish plans and programmes were reviewed and included in the NIR.	Northern Irish plans and programmes were reviewed and included in the SEA ER.





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	<p>the Environmental Report may benefit from the inclusion of these. Please see list below:</p> <p>It may be worth including in your considerations the following:</p> <ul style="list-style-type: none"> <li>• The Wildlife (NI) Order 1985 (as amended)</li> <li>• Wildlife and Natural Environment Act (NI) 2011</li> <li>• The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended)</li> <li>• The Environment (NI) Order 2002</li> <li>• The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017</li> <li>• The Strategic Planning Policy Statement (SPPS) for Northern Ireland</li> <li>• Planning Policy Statements (PPS – in particular PPS2 and PPS18). It should be noted that the PPS's will be superseded by Local Development Plans when they are adopted.</li> <li>• Biodiversity Strategy for NI to 2020  <a href="https://www.daera-ni.gov.uk/publications/biodiversity-strategy-northern-ireland-2020-0">https://www.daera-ni.gov.uk/publications/biodiversity-strategy-northern-ireland-2020-0</a></li> <li>• Draft Environment Strategy  <a href="https://www.daera-ni.gov.uk/consultations/esni-public-discussion-document">https://www.daera-ni.gov.uk/consultations/esni-public-discussion-document</a></li> <li>• The Draft NI peatland policy:  <a href="https://www.daera-ni.gov.uk/consultations/ni-peatland-strategy-consultation">https://www.daera-ni.gov.uk/consultations/ni-peatland-strategy-consultation</a> .</li> <li>• The Draft Green Growth Strategy Consultation on the draft Green Growth Strategy for Northern Ireland   Department of Agriculture, Environment and Rural Affairs (<a href="https://www.daera-ni.gov.uk">daera-ni.gov.uk</a>)</li> </ul>			



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<ul style="list-style-type: none"> <li>Northern Ireland Energy Strategy 2050 Northern Ireland Energy Strategy 2050   Department for the Economy (<a href="https://economy-ni.gov.uk">economy-ni.gov.uk</a>)</li> </ul>			
	<p><b>Natura Impact Statement</b></p> <p>NED acknowledges receipt of the Natura Impact Statement (NIS). NED welcomes in the Natura Impact Statement a 15km buffer and the use of Source-Pathway-Receptor model for designated site selection and that National Site Network sites in Northern Ireland have been included in the assessment.</p>	Noted.	None.	None.
	<p>NED note in relation to Cuilcagh Mountain SAC (UK0016603) that Table 3-1 references that the site is immediately adjacent to the study area, however this is not the case as the site is c. 5km from the study area. NED also notes reference to the potential for land take etc within both Tables 3-1 and 4-1. NED advise that the site is located within Northern Ireland and outwith the study area and therefore this reference is incorrect and should be corrected.</p>	Noted	The NIR was updated appropriately to reflect this commentary.	None.
	<p>We welcome that further environmental assessment including Appropriate Assessment will be required for future projects arising from the implementation of the Draft LACAP and that projects within the Draft LACAP area will be considered in combination with all lower tier projects that may arise. NED advise continued and early engagement with the relevant bodies in NI. NED also advises that should the NIS change in respect to impacts upon UK National Site Network sites then NED should be re-consulted.</p>	Noted. The local authority should have regard to this commentary during Plan implementation.	None.	None.
	<p><b>Air Quality Comments</b></p> <ul style="list-style-type: none"> <li>Consideration should be given as to the potential impact of the Plan on other air pollutants such as agricultural ammonia, nitrogen oxides and resulting nitrogen deposition at both sites in the Republic of Ireland and NI (transboundary impacts). Consideration of any co-benefits should be included.</li> </ul>	The SEA found the Plan does not support any development or activities that may generate air agricultural ammonia or nitrogen oxides.	None	None



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>E.g. protecting and restoring of peatlands can help to increase resilience to other threats and pressures, including the impacts of ammonia and nitrogen deposition on the vegetation and habitat.</p> <p>Acknowledgment could be made of the fact that ammonia can act as a precursor to fine particulate matter within Section 4.8 of the Environmental Report.</p>			
	<ul style="list-style-type: none"> <li>Ireland is now included in the Air Pollution Information System (APIS) which provides information on the impacts of air pollutants, such as Nox, ammonia emissions and the associated N deposition on sensitive habitats and species. The map feature within APIS enables detailed information to be provided on the</li> </ul>	<p>The SEA found the Plan does not support any development or activities that may generate air agricultural ammonia or nitrogen oxides.</p>	<p>None</p>	<p>None</p>
	<p><b><u>Water Management Unit Comments</u></b></p> <p>Water Management Unit notes the SEA Environmental Report for the Draft Local Authority Climate Action Plan 2024-2029 for Leitrim County Council states:</p> <ul style="list-style-type: none"> <li>Water quality data is collected by the EPA. The County is located mainly within the Erne catchments. (Section 4.9)</li> <li>Key Issues Relating to the Draft LACAP: Potential pressures and impacts on water body status from the construction of renewable energy and blueway projects i.e. increased sedimentation, groundwater recharge and accidental spillages. (Section 4.9.1)</li> <li>Evaluation of the Environmental Effects of Plan Implementation: The evaluation considers potential transboundary effects. (Section 7.2)</li> </ul>	<p>It was noted that all effects of the plan have been evaluated (inclusive of effects that may be transmitted via environmental pathways to Northern Irish receptors). Mitigation measures have been adopted to ensure that the environmental effects of Plan Action are controlled at the source. The environmental assessment reports will be updated to include a greater level of detail on the Northern Irish baseline environment and to demonstrate more expressly how transboundary effects were considered and mitigated.</p>	<p>The NIR was updated to demonstrate more expressly how transboundary effects were considered and mitigated.</p>	<p>The SEA ER was updated to demonstrate more expressly how transboundary effects were considered and mitigated. Additional data on Northern Ireland's baseline water environment within the zone of influence of the Plan area has been provided.</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Water Management Unit cannot find any direct evidence in the report that the potential for transboundary impacts to the aquatic environment in Northern Ireland has been considered, including assessment of relevant baseline conditions, impacts and pressures, or cognisance taken of Northern Irelands River Basin Management Plans. Water Management Unit would as a minimum liked to have seen an unambivalent statement as to whether, or not, there is the potential for impacts to arise to Northern Irelands aquatic environment through implementation of the plan.</p>			
DECC	<p>The Department of the Environment, Climate and Communications acknowledges receipt of the draft Climate Action Plan of Leitrim County Council, SEA Environmental Report and AA Natura Impact Report for written submission or observation, on 4th December 2023.</p> <p>The Climate Action and Local Carbon Development (Amendment) Act 2021 provides for an additional Section 14B (1) of the Climate Action and Low Carbon Development Act 2015 in relation to the role of local authorities. This sets out that each local authority shall prepare and make a plan (referred to as a Local Authority Climate Action Plan – LA CAP) specifying the mitigation and adaptation measures to be adopted by a local authority for a period of five years.</p> <p>A local authority shall make a LA CAP (a) in the case of the first such plan, within 12 months of the receipt of a request from the Minister, (b) in the case of each subsequent plan, not less than once in every period of five years. The request to make a LA CAP was issued by Minister Ryan on 24 February 2023.</p> <p>As stated in the legislation, the LA CAP shall, in so far as practicable, be consistent with the most recent approved climate action plan and national adaptation framework. In making a LA CAP, a local authority shall have regard to (a) the most recent approved national long term climate action strategy, (b) the most recent approved sectoral adaptation plans, (c) any policies of the Minister or the Government on climate change. In making the plan, a local authority shall consult and co-operate with</p>	<p>Noted. These comments relate to the core focus of the Plan and not SEA and AA related matters. The local authority should have due regard to the commentary and observations.</p>	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>adjoining local authorities, consult with the Public Participation Network in the administrative area of the local authority and such other persons as the local authority considers appropriate; and, co-ordinate, where appropriate, with adjoining local authorities in relation to the mitigation measures and adaptation measures to be adopted. It shall consider any significant effects the implementation of the LA CAP may have on adjoining local authorities, and consider any submissions made to it by an adjoining local authority under subsection (5)(c).</p> <p>In March 2023, the Minister launched a set of Local Authority Climate Action Plan Guidelines under the Climate Action and Low Carbon Development (Amendment) Act 2021 to assist local authorities in preparing their climate action plans. These guidelines provide robust guidance to local authorities to ensure a coherent and consistent approach.</p> <p>The plans will help local authorities to address, in an integrated way, the mitigation of greenhouse gas emissions and climate change adaptation and will strengthen the alignment between national climate policy and the delivery of effective local climate action. Each local authority is responsible for reducing greenhouse gas emissions from across its own assets and infrastructure, while also taking on a broader role of working with others to reduce emissions within the local authority area. The plans will enhance local authorities' ability to lead, coordinate and become agents of change in response to the ongoing climate change crisis. They will promote evidence-based and integrated climate action and will provide strategic direction at local and community levels on the delivery of the national climate objective.</p> <p>Each local authority is required to identify a Decarbonising Zone (DZ) in their jurisdiction within their LA CAP. DZs are a mechanism to harness a portfolio of actions, projects and technologies to deliver national and regional climate objective at local level.</p> <p>Their aim is to give local authorities the mandate to innovate and develop demonstrator projects which, where successful, can be replicated and scaled up nationally.</p>			



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Commitment to delivering the LA CAP and its impact will be demonstrated through a structured process of implementation with ongoing monitoring and progress reporting. Key Performance Indicators (KPIs) will play a significant role in monitoring climate action from the plans, as set out in the Guidelines. A monitoring and reporting system to support the LA CAPs will be developed by DECC in collaboration with the local government sector.</p> <p>The Department continues to provide support to local authorities for the development and implementation of LA CAPs. Two new specialist resources - a Climate Action Coordinator and Climate Action Officer – have been funded from this Division which form the nucleus of Climate Action Teams. A renewed Service Level Agreement has been developed with the Climate Action Regional Offices (CAROs), providing €12 million in funding for a six-year period. The CAROs will continue their work in supporting local government to coordinate and deliver climate actions, particularly in relation to the LA CAPs.</p> <p>The Department funds the Local Authority Climate Action Training Programme to ensure ongoing upskilling for local authority staff and elected members. Under the Training Programme, the four CAROs organised sectoral training sessions in the first half of 2023 to assist local authority staff in preparing their LA CAPs, providing training in areas such as transportation, built environment and land-use planning, inhouse mitigation actions, and DZs.</p> <p>The Department wishes to commend you as Chief Executive and the staff in your local authority for the dedication, commitment, and hard work in reaching this milestone and clearly demonstrating the leadership role of local government in climate action. I wish you every success in getting the plan to full approval in early 2024 and look forward to working with you over the coming years to support the delivery of your Local Authority Climate Action Plan.</p>			



## 2.5 SEA and Plan Modifications

LCC prepared a Report on submissions received during public consultation of the draft plan (herein referred to as Report on Submissions), including consultation submissions from Environmental Authorities, interested stakeholders and members of the public.

The Report on Submissions 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 Report on Submissions 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 Report on 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 Report on 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 Report on Submissions 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 2-5: Plan Action Modifications**

Action	Summary of Modification
CRT21	New Action inserted: <b>'Develop a Seed Library within Leitrim County Council Libraries'</b>
GL 10	Remove <b>"is represented by each section"</b> and replace with <b>"in place"</b>
GL 14	Remove <b>"during Climate Action Week each year"</b> .
CRT11	Remove <b>"Keen to be Green Communities"</b>
GL 5	Remove text County and insert <b>'County Council'</b>
GL 6	<b>'Climate Action Unit'</b> was replaced with <b>'Climate Action Team'</b>
CRT.2	Remove the words <b>"develop"</b> and <b>"range of"</b> from this action to read as follows: <b>"Distribute any age-appropriate informational supports to provide citizens with knowledge to understand and implement the transition in their own lives."</b>
CRT.6	Remove <b>"one stop shop"</b> .
N10	The words <b>"reed bed waste water filtration"</b> were included in the modified action.



Action	Summary of Modification
B34	The words 'Local Authority' were included in the modified action
N/A	The vision for the Carrick on Shannon DZ was updated to the below: 'Carrick-on-Shannon Decarbonising Zone will be a focus for sustainable place-based climate action opportunities including mitigation, adaptation and biodiversity enhancement, to deliver the National Climate Objective at local and community levels to provide a test bed of learning and understanding on the scale of the challenge, that can be applied elsewhere in County Leitrim'





## 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.

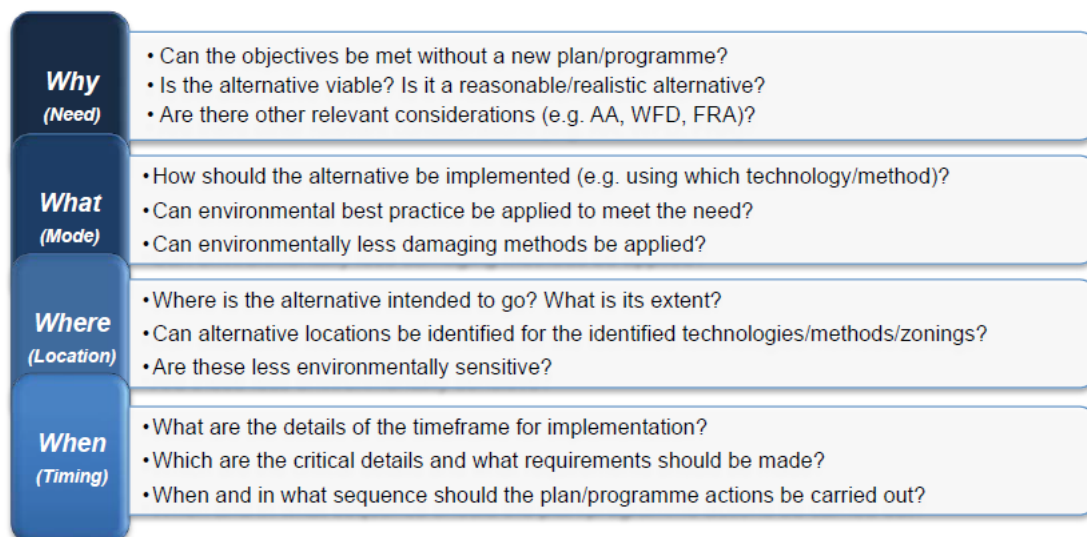
### 3.2 Approach to Developing Reasonable Alternatives

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 in any likely, significant, adverse environmental effects.

All potential effects that may cause transboundary impacts will also be appropriately mitigated with the adoption of the defined mitigation. Mitigation measures have been adopted to ensure that the environmental effects of Plan Action are controlled at the source. Thus, it can be concluded that the LACAP will not have any likely, significant transboundary impacts.



## 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.

LCC 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 Leitrim County Council who will report on progress and performance to the relevant SPC annually. A monitoring report will be prepared to document monitoring outcomes. This report shall be made available for public inspection.

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

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

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



**Table 5-1: SEA Monitoring Programme**

Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
Overall	O1	Ensure, where appropriate, that lower-level plans and projects contribute to overall environmental monitoring processes within the County.	Lower-level plan and project accordance with the plan.	Require all lower-level plans and projects have appropriate regard to and appropriately support all action and development proposals defined in the Plan.  Ensure alignment between the Plan and the County Development 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, and DAERA where appropriate).
	PHH2	Ensure the Decarbonising Zone avoids and minimises impacts to the existing economic activities within the area and does not compromise/conflict with existing land use objectives.	Compliance of action and development supported by the plan with policies and land use objectives protective/supportive of economic development in the county defined in the County Development Plan (CDP) or County Local Area Plans.	No contravention of policies and land use objectives protective/supportive of economic development in the county defined in the CDP or County Local Area Plans.  Consent for development proposals supported by the plan only to be granted where development will be carried out in accordance with proper planning and sustainable development.	Internal monitoring of compliance with CDP Policy Objectives.  Internal monitoring of likely significant environmental effects of development projects.
Biodiversity, Flora & Fauna	B1	Ensure Climate Action does not conflict with biodiversity protection, restoration and rehabilitation.	Compliance of action and development supported by the plan with policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the CDP.  Condition of habitats impacted by climate change (Area km <sup>2</sup> /length metres).  Number and geographical distribution of Species or Species population trends	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.  No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the	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>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>County's Biodiversity Action Plan.</p> <p>Consent for development proposals supported by the plan only to be granted where development complies with policy supporting biodiversity protection and enhancement.</p>	
	B2	Ensure compliance with Habitats and Birds Directives with regard to protection of European Sites and Annexed habitats and species <sup>1</sup> .	Condition of European Sites and annexed species.	No adverse impacts on the condition of European Sites and Annexed habitats and species as a result of plan implementation.	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Consultation with the NPWS and DAERA (where appropriate).</p> <p>Department of Housing, Local Government and Heritage report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive.</p> <p>Department of Housing, Local Government and Heritage's National Birds Directive Monitoring Report for the Birds Directive under Article 12.</p> <p>Review of NPWS and DAERA publications regarding the status of designated sites.</p>
	B3	Support Article 10 of the Habitats Directive with regard to the management of features of the landscape which - by virtue of their linear and continuous structure or their function as stepping	Condition of features of the landscape which - by virtue of their linear and continuous structure or their function as stepping stones (designated or not) - are of major	No adverse impacts on the condition of features of the landscape which - by virtue of their linear and continuous structure or their function as stepping stones (designated or not) - are of major importance for wild fauna and flora as	<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 Plan.</p>

<sup>1</sup> 'Annexed habitats and species' refer to those listed under Annex I, II & IV of the EU Habitats Directive and Annex I of the EU Birds Directive.





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



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
			with policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the County's Biodiversity Action Plan.	Consent for development proposals supported by the plan only to be granted where development complies with policy supportive of biodiversity protection and enhancement.	
Landscape, Seascape & Visual Amenity	L1	Avoid or, minimise impacts to statutory landscape designations, including seascape designations	Status of Landscape Character Areas, the Seascape, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects. Number of developments consented that result in avoidable adverse impacts on Landscape Character Areas, the Seascape, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects, or NI Areas of Outstanding Beauty. Number of areas in the local authority functional area designated for their landscape character or visual amenity.	All action and development proposals supported by the plan must comply with policy objectives relating to the protection of Landscape Character Areas, the Seascape, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects defined in the CDP. No development supported by the plan should have an adverse impact on Landscape Character Areas, the Seascape, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects, or NI Areas of Outstanding Beauty	Internal monitoring of compliance with CDP Policy Objectives. Internal monitoring of likely significant environmental effects of development projects. Review of future iterations of the Landscape Character Assessment.
	L2	Avoid or minimise adverse visual effects on residential receptors or other sensitive visual receptors.	Number of developments consented that result in avoidable adverse visual impacts on residential receptors or other sensitive visual receptors.	No development supported by the plan should have a significant adverse visual impact on residential receptors or other sensitive visual receptors. All development supported by the plan should adhere to relevant Development Management Standards defined in the CDP, in particular standards defined in relation to physical and visual impacts.	Internal monitoring of likely significant environmental effects of development projects. Review of future iterations of the Landscape Character Assessment.
Cultural Heritage - Archaeology & Architectural	CH1	Avoid impacts upon archaeological heritage (including entries to the Record of Monuments and Places (RMP)) and architectural heritage	Percentage of features contained in the RMP (and, where relevant, the associated surrounding context) protected from	No features contained in the RMP (nor the associated surrounding context) should be significantly adversely affected as a result of the	Internal monitoring of likely significant environmental effects of development projects. Consultation with the Department of



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
		(including entries to the Record of Protected Structures (RPS) and National Inventory of Architectural Heritage (NIAHs)).	adverse effects due to action and development occurring as a result of this plan. Percentage of features contained in the RPS and NIAH (and, where relevant, the associated surrounding context) protected from adverse effects due to action and development occurring as a result of this plan.	implementation of this plan. No features contained in the RPS and NIAH (nor the associated surrounding context) should be significantly adversely affected as a result of the implementation of this plan.	Tourism, Culture, Arts, Gaeltacht, Sport and Media Review of Heritage Plan environmental effect monitoring
Soils	S1	Avoid or minimise effects on mineral resources or soils.	Number of instances of significant adverse impacts on mineral resources or soils occurring, including the pollution, loss or degradation of mineral resources or soils, as a result of action and development supported by the plan.	No instances of significant adverse impacts on mineral resources or soils occurring as a result of action and development supported by the plan.	Internal monitoring of likely significant environmental effects of development projects. Consultation with Geological Survey of Ireland and review of published data on the soils environment.
Land Use	LU1	Avoid or minimise effects on existing land use.	Number of instances of significant adverse impacts on existing land use as a result of plan implementation.	No instances of significant adverse impacts on existing land use as a result of plan implementation.	Internal monitoring of likely significant environmental effects of development projects. Review of Land Use, Land Use Change and Forestry related Greenhouse Gas emissions calculated in the Baseline Emission Inventory.
Air Quality and Noise	AQN1	Increase the number of people travelling to work or school via public transport or by non-mechanical means.	% change in modal split. Length of new sustainable transport routes developed.	Reduction in private car use. Extension and improvement of the sustainable transport network in the plan area.	Central Statistics Office (CSO) Population data - Commuting in Ireland. Internal monitoring of length of new sustainable transport routes developed.
	AQN2	Avoid or minimise effects on local air quality.	Number of developments consented that result in avoidable adverse air quality impacts on sensitive receptors.	No development supported by the plan should have a significant adverse air quality impact on sensitive receptors.	Internal monitoring of likely significant environmental effects of development projects. Consultation with the EPA.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
			<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>All development supported by the plan should adhere to relevant Development Management Standards defined in the CDP relating to the protection of air quality.</p> <p>Minimise ambient air quality standard exceedances in the County.</p>	<p>Review of EPA Air Quality Monitoring undertaken in the County.</p> <p>Review of EPA annual 'Air Quality in Ireland' Report</p>
	AQN3	Avoid or minimise adverse noise impacts.	Number of sensitive receptors exposed to noise nuisance.	No sensitive receptors exposed to nuisance noise in the County.	<p>Internal monitoring of likely significant environmental effects of development projects. Monitoring of internal noise complaint investigations undertaken.</p> <p>Consultation with the EPA and DAERA (where appropriate).</p>
Water	W1	Maintain and/or improve, the quality and status of surface, transitional, bathing, and coastal 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>Status of transitional and coastal water bodies as reported by the EPA Water Monitoring Programme for the Water Framework Directive (WFD).</p> <p>Status of Northern Irish Waters, as reported by DAERA.</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 water or affect the ability of any 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> <p>Review of DAERA water quality data.</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 surface 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 and DAERA.
	W4	Comply as appropriate with the provisions of the Flood Risk Management Guidelines.	Number of incompatible developments (supported by the plan) consented within flood risk areas.	Minimise developments (supported by the plan) granted 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. Number of non-compliances with Water Supply (Water Quality) Regulations (Northern Ireland).	No non-compliances with Drinking Water Quality Standards defined in the European Union (Drinking Water) Regulations 2023. No non-compliances with Water Supply (Water Quality) Regulations (Northern Ireland)	EPA Drinking Water Quality Reports. Review of environmental quality data detailed in the EPA Maps Application. Review of DAERA Drinking Water Inspectorate reports on drinking water quality.
Material Assets	MA11	Avoid or minimise effects on built/amenity assets and infrastructure	Number of incompatible developments (supported by the plan) adversely affecting	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
			built/amenity assets and infrastructure.		
	MAI2	Avoid or minimise effects upon existing and (where known) planned infrastructure.	Number of incompatible developments (supported by the plan) adversely affecting existing or planned infrastructure, including water supply, wastewater management, energy and transport infrastructure.	No incompatible development (supported by the plan) adversely affecting existing or planned material assets infrastructure.	Internal monitoring of likely significant environmental effects of development projects, including monitoring of effects on other future planned or committed material asset infrastructure projects. Consultation with Irish Water, Gas Networks Ireland, ESB Networks and Transport Infrastructure Ireland.
	MAI3	Promote sustainable transportation.	% change in modal split. Kilometres of permanent segregated cycling network. Kilometres of permanent integrated cycling network. Number of Electric Vehicle charging points in the county. Total Area of road reallocated for sustainable alternatives (m <sup>2</sup> ).	Percentage increase in the number of public transport users in the County Increase kilometres of permanent segregated cycling network. Increase kilometres of permanent segregated cycling network. Increase number of Electric Vehicle charging points in the county. Increase Total Area of road reallocated for sustainable alternatives.	CSO Population data - Commuting in Ireland. Internal monitoring of length of new sustainable transport routes developed.
	MAI4	Promote sustainable waste management.	Tonnes of hazardous waste received at Council Waste Management Facilities annually. Tonnes of W.E.E.E. waste received at Council Waste Management Facilities annually. 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
	MA15	Promote sustainable water use and drainage management.	Level of water use in the County. Compliance with Sustainable Drainage System (SuDS) related development management standards defined in the CDP.	Reduced water use in the county. All development (supported by the plan) must comply with SuDS related development management standards defined in the CDP.	CSO water consumption data. Internal monitoring of flood risk associated with development projects and development project compliance with relevant flood risk and management related development management standards.
Tourism & Recreation	TR1	Avoid or minimise effects upon tourism and recreation amenities.	Visitor trips to local authority functional area	Stable or increasing number of visitor trips to local authority functional area	Fáilte Ireland Data on Tourism Performance
Climate Change	CF1	Delivery of the necessary action to support the national target of 80% electricity from renewable sources by 2030.	Level of Greenhouse Gas (GHG) emissions in the County. Level of renewable energy infrastructure in the County.	Reduce GHG emissions associated with the Energy sector in the County. Increase the level of renewable energy infrastructure in the County.	EPA National Emission Inventory. Baseline Emission Inventory for the County. Megawatt hour (MWh) output from renewable energy infrastructure in the county.
	CF2	Actively support the delivery of all national climate policy as appropriate to the county with the prioritisation and acceleration of evidence-based measures.	Level of GHG emissions in the County	Reduce GHG emissions for all sectors in the County.	EPA National Emission Inventory. Baseline Emission Inventory for the County.
	CF3	Assist in the delivery of the climate neutrality objective at local and community levels.	Level of GHG emissions in the County. Level of GHG emissions in the Decarbonising Zone. Net addition of tree cover added.	Reduce GHG emission in the County to Net Zero. Reduce Decarbonising Zone GHG emissions to Net Zero. Increase level of tree cover in the County.	EPA National Emission Inventory. Baseline Emission Inventory for the County. Baseline Emission Inventory for the Decarbonising Zone.
	CF4	Deliver a Decarbonising Zone (DZ) within the local authority area to act as a test bed for a range of climate mitigation and adaptation measures in a specifically defined area through the identification of	Level of GHG emissions in the Decarbonising Zone.	Reduce Decarbonising Zone GHG emissions to Net Zero.	Baseline Emission Inventory for the Decarbonising Zone.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
		projects and outcomes that will assist in the delivery of the National Climate Objective.			
Inter-relationships	IR1	Maintain and improve the health of people, ecosystems and natural processes Actively seek to integrate opportunities for environmental enhancement during adaptation to climate change	Number of blue and green infrastructure measures included as part of development projects that have been granted consent.	Increase the number of blue and green infrastructure measures included as part of development projects that have been granted consent.	Review of granted planning consents.





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