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ENVIRONMENTAL SCIENCE &  
PLANNING

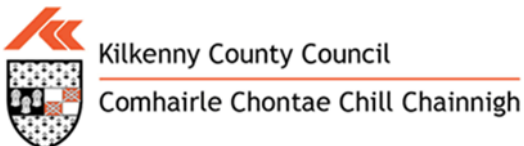
# LOCAL AUTHORITY CLIMATE ACTION PLAN

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## Strategic Environmental Assessment Statement

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Prepared for:  
Kilkenny County Council



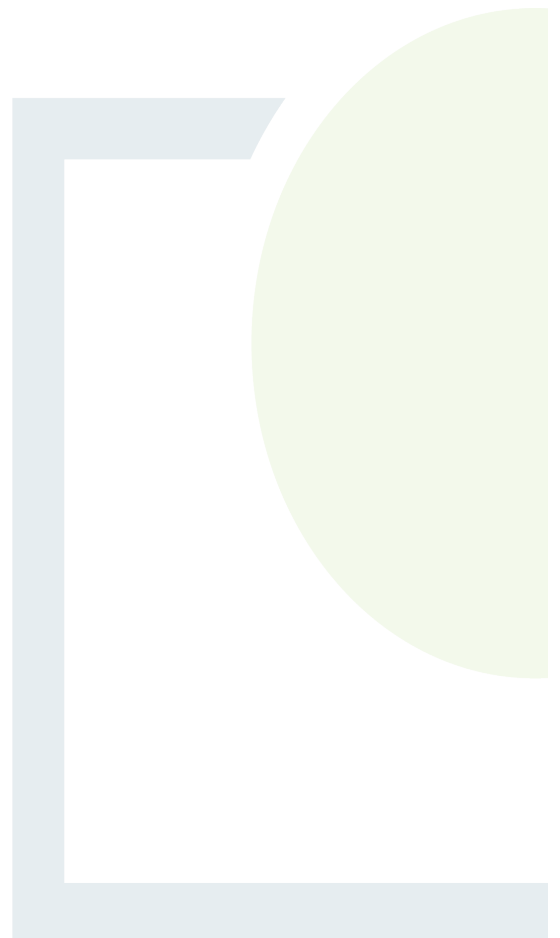
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Core House, Pouladuff Road, Cork, T12 D773, Ireland

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

CORK | DUBLIN | CARLOW

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



## Strategic Environmental Assessment Statement

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

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**Client:** Kilkenny County Council

**Keywords:** Strategic Environmental Assessment, Appropriate Assessment, SEA Statement, SEA Scoping, SEA Environmental Report, Local Authority Climate Action Plan.

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

Kilkenny County Council (KCC) have adopted the Kilkenny 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 shave 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	<p>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</p>	<p>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.</p>
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>





Environmental Authority	Summary on the Scoping Consultation Submission	How was this submission taken into account during the SEA?
<p>Department of the Environment, Climate and Communications</p>	<p>Background information on the Geological Survey of Ireland was provided initially in this submission. An overview of county-level geoheritage and groundwater assets and databases was provided. Information was provided on geological, geotechnical, geothermal, natural resources, geochemistry and geophysical data sources. Specific advice on geological/hydrogeological considerations that needed to be taken into account during the making of the Plan was provided, as follows:</p> <ol style="list-style-type: none"> <li>1. Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general.</li> <li>2. Geohazards should be considered during the Plan-making and development processes.</li> <li>3. Sustainable development of our natural resources should be an integral part of all development plans from a national to regional to local level to ensure that the materials required for our society are available when required.</li> </ol>	<p>Appropriate regard was had to these baseline geological and hydrogeological data sources and considerations during the preparation of the SEA Environmental Report for the LACAP.</p>
<p>Department of Housing, Local Government and Heritage</p>	<p>The Department welcomed various approaches to the SEA for the LACAP e.g. various SEOs defined for Biodiversity, Flora and Fauna; the proposal to carefully examine the impacts of linear projects on biodiversity; the proposal to consider potential for invasive species spread).</p> <p>The Department made recommendations in relation to wording and focus of a number of Biodiversity related SEOs (promoting better alignment with the National Biodiversity Action Plan).</p> <p>The Department advised on various other impact assessment related matters, as follows:</p> <ul style="list-style-type: none"> <li>- The potential impact linear infrastructure, including active travel and green infrastructure projects, may have on biodiversity and the water environment.</li> <li>- The inclusion of carbon balance calculations for renewable energy developments, particularly in peatlands.</li> <li>- The potential impact of development or activities that may cause nitrogen deposition.</li> <li>- Utilizing Nature Based Solutions for the management of rainwater and surface water runoff.</li> </ul>	<p>Biodiversity related SEOs have been updated and shaped to reflect the observations of the Department. For example, SEO B5 has been reworded to the following text - 'No net contribution to biodiversity losses or deterioration in response to the biodiversity emergency' - which is more measurable and defined and incorporates the idea of compensation for negative impacts to biodiversity which is sometimes unavoidable. Similarly, SEO B4 was updated to consider potential effects of the Plan on non-designated locally important sites (the indicators and targets for this SEO were also updated appropriately).</p> <p>All advice with respect to the potential impacts of the LACAP was considered during the environmental assessment process. The need to assess and mitigated the effects of infrastructure supported by the Plan was one aspect that underpinned the SEA. With the adoption of the proposed mitigation, including the Environmental Governance Principles, the LACAP does not support the carrying out of activity that would result in nitrogen deposition. Climate action co-benefits including opportunities for utilizing nature-based solutions in development projects were promoted through the environmental mitigation measures defined in the SEA and AA.</p>



Environmental Authority	Summary on the Scoping Consultation Submission	How was this submission taken into account during the SEA?
	<p>The Department advised that monitoring indicators should be linked back to environmental effects and proposed mitigation measures. They stated that 'SEA monitoring should reflect the nature and level of detail of the LACAP. Monitoring of local-level plans should focus on both local issues (e.g. habitat loss) and particular aspects of larger scale problems that are relevant to the LACAP area'</p> <p>They advised the Plan should be Screened for AA and subject to full AA if necessary. They also recommended consulting AA related guidelines, as appropriate. They advised that cumulative effects of the Plan in combination with other plans and projects should be considered.</p>	<p>The SEOs indicators and targets defined in the LACAP SEA Monitoring Programme were shaped to ensure they were appropriately reflective of potential environmental effects (positive and negative) that may arise in the local authority functional area due to the implementation of the Plan.</p> <p>The Plan was subject to AA Screening which determined full AA was required. Full AA was undertaken in parallel with the SEA (using an Integrated Biodiversity Assessment Approach). The suite of environmental mitigation measures defined for the Plan will also serve to prevent significant adverse effects on European sites. The AA considered the cumulative effect of the Plan in combination with other plans and projects on European sites.</p>



## 2.2 Environmental Assessment and Mitigation

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

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

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

### 2.2.1 Mitigation through consideration of alternatives

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

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

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

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

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

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
1.3	Develop a Kilkenny County Council Green Public Procurement (GPP) Strategy	Develop <b>and implement</b> a Kilkenny County Council Green Public Procurement (GPP) Strategy
1.9	Deliver Flood RELIEF Schemes under the Catchment and Flood Risk Assessment Management (CFRAM) Programme, and Minor Flood Mitigation Works, incorporating nature based solutions where possible	Attach the following text to the action: <b>whilst having appropriate regard to environmental protection requirements associated with flood resilience development.</b>
1.19	Respond to new priorities and programmes that emerge over the lifetime of the Local Authority Climate Action Plan.	Attach the following text to the action: <b>having due regard to environmental sensitivities, biodiversity, European sites, human receptors, and the need to promote sustainable practices.</b>
2.3	Develop and implement a Regional EV Infrastructure Strategy in collaboration with neighbouring local authorities	Attach the following text to the action: <b>Advocate and exert influence and control, as appropriate, to ensure such development promotes climate action co-benefits and does not contravene relevant environmental protection criteria or cause significant negative environmental effects.</b>
2.5	Develop a Fleet Decarbonisation Strategy for Kilkenny County Council Fleet	Attach the following text to the action: <b>Ensure the strategy aligns with sustainability principles.</b>
2.8	Reallocate urban space towards the sustainable movement of people, and placemaking	Attach the following text to the action: <b>having due regard to opportunities to promote nature-based solutions and environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, and cultural heritage. Prioritise roads and streets currently or likely to be used by public bus services. Work towards ensuring network options are developed between active travel options and public transport routes.</b>
2.1	Enhance permeability to support active travel	Attach the following text to the action: <b>having due regard to environmental sensitivities such as traffic and transport constraints and aspects, the receiving water environment, local air quality, biodiversity, and European sites.</b>
2.12	Integrate transport modes and enable a shift to sustainable modes through the effective management of parking demand and development of park and ride/stride and multi-modal hubs	Attach the following text to the action: <b>Ensure such development promotes climate action co-benefits, including SuDS and nature based solutions, and does not contravene relevant environmental protection criteria or cause significant negative environmental effects.</b>
2.13	Develop a cycle network for Kilkenny City and larger urban areas	Attach the following text to the action: <b>Ensure the cycle network is planned in a manner that has due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites and cultural heritage.</b>
2.14	Implement the "Safe Routes to School Programme"	Attach the following text to the action: <b>having due regard to environmental sensitivities such as traffic and transport constraints and aspects, the receiving water environment, local air quality, biodiversity, and European sites.</b>



LACAP Action Reference	LACAP Action	Mitigation Measure
2.18	Identify and implement actions to improve drainage on the Regional and local road network, and identify infrastructure at risk from climate events	Attach the following text to the action: having due regard to the need to promote nature based solutions and Sustainable Drainage Systems, and environmental sensitivities, including water quality, biodiversity and European sites.
2.21	Develop a Buildings/Facility Management Strategy for Kilkenny County Council buildings and facilities	Attach the following text to the action: having due regard to the need to appropriately protect biodiversity, and natural and built heritage.
2.23	Continue to deliver the Public Lighting Energy Efficiency Project (PLEEP)	Attach the following text to the action: whilst continuing to use best available technology to suitably minimise potential environmental effects of lighting.
2.26	Undertake a programme of energy reduction, retrofitting, and onsite renewable measures on Local Authority buildings, facilities and social housing	Attach the following text to the action: having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity, and the need to appropriately protect and conserve protected structures.
2.3	Ensure best practise in energy efficiency retrofitting of traditional/heritage buildings	Attach the following text to the action: having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity, and the need to appropriately protect and conserve protected structures.
2.31	Deliver sustainable and compact development	Attach the following text to the action: having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity.
2.32	Develop a planning policy which supports the re-use of existing buildings	Attach the following text to the action: having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity, and the need to appropriately protect and conserve protected structures.
2.33	Continue to add to the Vacant Sites Register and Derelict Sites Register	Attach the following text to the action: having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity, and the need to appropriately protect and conserve protected structures.
2.34	Achieve Home Performance Index (HPI) Gold Standard on all new Kilkenny County Council social housing	Attach the following text to the action; having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity, and the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations.
2.36	Deliver a retrofit programme for Kilkenny County Council Social Housing	Attach the following text to the action: having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity, and the need to appropriately protect and conserve protected structures.
2.37	Undertake a programme of energy reduction, retrofitting and onsite renewable measures on Local Authority buildings and facilities	Attach the following text to the action: having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity, and the need to appropriately protect and conserve protected structures.
3.1	Prepare a Tree Strategy and Policy for Kilkenny City to provide a long term vision for the management of public trees	Attach the following text to the action: whilst taking measures to promote the use of native species over non-natives and having due regard for water quality and soil stability issues whilst undertaking the planning process.



LACAP Action Reference	LACAP Action	Mitigation Measure
3.2	Promote and facilitate tree, woodland and hedgerow protection, planting and management on public and private land	Attach the following text to the action: whilst taking measures to promote the use of native species over non-natives and having due regard for water quality and soil stability issues whilst undertaking the planning process.
3.3	Develop an Invasive Species Register and Treatment Strategy for Council land	Attach the following text to the action: This programme shall be developed by a competent ecology team, and shall have due regard to the need to appropriately manage and prevent the spread of invasive species.
3.4	Deliver a Pollinator Programme to protect and enhance pollinator habitats on Council owned land and in the wider county	Attach the following text to the action: whilst taking measures to promote the use of native plant species over non-natives, as appropriate.
3.5	Identify and utilise alternatives to herbicide use on Council land	Reword to the following: Identify and utilise environmentally friendly alternatives to herbicide use on Council land
3.6	Identify, map and utilise local authority owned land for habitat enhancement/restoration and nature based solutions	Attach the following text to the action: whilst taking measures to promote the use of native plant/animal species over non-natives, as appropriate.
4.1	Deliver the Community Climate Action Fund	Attach the following text to the action: Ensure projects supported by this action are delivered in a manner that has due regard to: - All relevant environmental sensitivities (e.g., heritage, biodiversity, European site related sensitivities), and; - Opportunities to promote climate action co-benefits, where possible (e.g., through the use of nature-based solutions or sustainable drainage systems).
5.2	Develop and deliver a series of Business Showcase/Conference events, and positive Case Studies	Reword to the following: Develop and deliver a series of Business Showcase/Conference events, and positive Case Studies regarding decarbonisation/climate initiatives.
5.5	Support local businesses and social enterprises to optimise opportunities in the green tech and circular/green economy	Update the tracking measure to "number of businesses supported"
5.14	Undertake an audit of the waste produced by the Council's operations and services	Attach the following text to the action: Updated Council waste management policy with a view to promoting waste prevention, minimization and recycling.
5.15	Explore the potential to develop alternative sources of energy at the former landfill site at Dunmore	Attach the following text to the action: Consider planning and environmental constraints and requirements in relation to such a project at feasibility stage.
5.16	Explore the potential to repurpose, upcycle and/or to use waste collected at Civic Amenity Sites, and other appropriate locations, to generate new products and enterprises	Attach the following text to the action: having due regard to the need to comply with relevant provisions of the Waste Management Act.



LACAP Action Reference	LACAP Action	Mitigation Measure
DZ2	Support Kilkenny City Sustainable Energy Communities (SEC's) in the DZ	Attach the following text to the action: <b>having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity, and the need to conserve built heritage.</b>
DZ3	Building on the findings of the DZ Baseline Emissions Inventory, and the stakeholder engagement and Visioning work, develop a Register of Opportunities and a programme of actions for the DZ	Consider updating tracking measure to: <b>- Register of Opportunities and actions developed</b> <b>- Number of actions implemented, having due regard for environmental sensitivities</b>
DZ4	Implement relevant Local Authority Climate Action Plan actions in the DZ	Attach the following text to the action: <b>having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity, and the need to conserve built heritage.</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, flood zones which contribute to green infrastructure.
Support opportunities to improve and restore ecological connectivity of non-designated habitats and sites (including watercourse connectivity) 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 invasive species, particularly with regard to Schedule III species. No local authority climate action related development project that is likely to cause the spread of invasive species listed in Schedule III shall be supported. All supported projects shall align with the goal of appropriately protecting, restoring and enhancing terrestrial and aquatic habitat and conditions to support the promotion of native species.
Support opportunities to promote peatland restoration, rehabilitation and maintenance inclusive of biodiversity enhancement, 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 ER	Changes to NIR
The Department of Housing, Local Government and Heritage (DHLGH)	<p><b>Archaeology and Architectural Heritage</b></p> <p>The Department welcomes the publication of local authority draft Climate Change Adaptation Strategy and would like to draw your attention to the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (CCSAP) (2019) prepared as part of the National Adaptation Framework. The CCSAP identifies the priority impacts for the built and archaeological heritage based on current climate change projections.</p>	Noted.	Reference has been made to the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) in Section 7.3 - <i>Potential Cumulative Effect of the LACAP in combination with other Plans and Projects</i> , and Appendix 1 - <i>Relationship of the Plan with other relevant Plans and Programmes</i> , as appropriate.	Reference has been made to the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) in Section 3.4 - <i>In-combination effects with Other Plans and Programmes</i> , and Appendix 2 - <i>Relationship with other plans and programmes</i> , as appropriate.
	<p>The Heritage Division of this Department is engaged with the local authorities through the departmental Climate Change Advisory Group and established Working Groups to ensure a consistent approach to protection and adaptation of heritage assets across the country and an alignment of policies, plans and actions across national, regional and local climate action. This Department anticipates ongoing engagement with the local authorities throughout the implementation of the current and future sectoral adaptation plans.</p>	Noted.	None.	None.
	<p>In the preparation and implementation of the local authority adaptation strategy, there are a number of issues regarding protection of built and archaeological heritage that this 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.
	<p>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</p>	<p>The SEA scoping report and SEA Environmental Report identify the built and archaeological heritage assets in the LA including structures and sites subject to statutory protection under the National Monuments</p>	None.	None.



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	Monuments Acts 1930 to 2014, or the Planning and Development Acts.	Acts 1930 to 2014, and the Planning and Development Act (as amended). Exhaustive detail on built and archaeological heritage is held on record by the local authority and provided in the Country Development Plan already.		
	Including objectives to carry out climate change risk assessments, including condition assessments, for the historic structures and sites in its area.	Noted. The local authority has included an action in the Plan to undertake a climate risk assessment of heritage assets within its remit.	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. The Plan defines actions that will serve to minimize and manage climate related disaster risk (e.g., flood risk) and improve the climate resilience of architectural and archaeological heritage.	None.	None.
	Including objectives to develop resilience and adaptation strategies for the built and archaeological heritage in its area.	Noted. The Plan defines actions that will improve the climate resilience of architectural and archaeological heritage.	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.
	This Department will shortly be publishing a new guidance document Improving Energy Efficiency in Traditional Buildings. This guidance will assist retrofitting installers and specifiers in how best to choose and apply energy efficiency measures to the historic building stock. The guidance is also intended to assist building owners and occupants in making decisions about upgrading their buildings, many of which are of architectural heritage significance. It is recommended that all proposed retrofitting projects undertaken or supported by the local authority to buildings of traditional construction should follow the principles and practice set out in that guidance.	Noted. It was recommended that the 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.



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	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.
EPA - Cian O'Mahony	The SEA should also assist in identifying ways to maximise the potential co-benefits of climate-related measures for air quality, human health, biodiversity, water quality and other interrelated areas (i.e. win-win solutions).	Noted and agreed. It was noted that the SEA Environmental Report (ER) has defined Environmental Governance Principles and action amendment suggestions to ensure climate action co-benefit opportunities are maximized. Various defined mitigation measures serve to promote win-win solutions.	None.	None.
	We recommend that the findings of the SEA ER and NIS are fully reflected in the Plan, to ensure that the relevant recommendations are fully considered and integrated as appropriate.	Noted and agreed. Environmental mitigation measures in the form of Environmental Governance Principles and climate action amendment suggestions have been fully integrated into the Plan itself.	None.	None.
	<p><b>Environmental Authorities</b></p> <p>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 was not 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>	It was assumed that SI No. 434 was a typo and SI No. 435 is what was intended to be addressed with this statement.	Updated the NTS to reflect the relevant information as required under Schedule 2 of SI No 435 of 2004 as amended.	None.



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
		The requirements of Schedule 2 of SI No 435 have been noted and amendments to the NTS have been made as appropriate.		
	<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>The Plan should include a commitment to consider any relevant updated actions, measures or recommendations that may arise in updates to the National Climate Action Plan (or the National Planning Framework) over the lifetime of the Plan.</p>	<p>Noted and agreed. It was noted that this was in reference to the LACAP and not the SEA ER or AA NIR documentation.</p> <p>It was recommended the Council include a commitment in the Plan to remain aligned with high level plans and programmes if this was not done already.</p> <p>It was recommended the Council include a commitment in the Plan to consider and appropriately integrate relevant updates to the national Climate Action Plan and National Planning Framework over the lifetime of the Plan.</p>	None.	None.
	<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</p>	The SEA produced recommended a suite of mitigation measures in response to climate actions considered to have potentially significant environmental effects.	None.	None.



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



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	<a href="#">assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf</a>	<p>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.).</p> <p>Similarly, where monitoring indicates that potential positive environmental effects associated with LACAP implementation are not being adequately realized, the LACAP should be reviewed and updated in a manner that supports the realization of all potential positive environmental effects, having regard to the overall vision and high-level objectives of the plan.'</p> <p>It was noted however that additional opportunities exist in relation to monitoring the positive environmental effects of defined climate action – in connection with SEOs PHH1, L1, AQN2, TR1. The SEA monitoring programme has been updated to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects arising due to plan implementation, where appropriate.</p> <p>The monitoring programme includes detail on the indicators, targets and data sources to be used to monitor and measure progress. Some additional detail on data sources has however been provided to better guide the SEA monitoring to be carried out across plan implementation.</p> <p>A commitment to remedial action in the event SEA monitoring shows the implementation of the Plan is having adverse environmental effects has been made in the SEA.</p>		
	<p><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</p>	<p>Noted.</p> <p>It was recommended the Council make a commitment to take account of any relevant recommendations in the SOER 2024 report, once published, in implementing the Plan over its lifetime.</p>	<p>None.</p>	<p>None.</p>



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	<p>implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies.</p> <p>The EPA are currently preparing the next iteration of the SOER report, which will be published in 2024. We recommend that a commitment is made in the Plan, to take account of any relevant recommendations in the SOER 2024 report, once published, in implementing the Plan over its lifetime.</p>			
	<p>SEA Statement – “Information on the Decision”</p> <p>Once the Plan is adopted, you should prepare an SEA Statement that summarises:</p> <ul style="list-style-type: none"> <li>• How environmental considerations have been integrated into the Plan;</li> <li>• How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;</li> <li>• The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,</li> <li>• The measures decided upon to monitor the significant environmental effects of implementation of the Plan.</li> </ul> <p>You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.</p>	Noted. An SEA statement has been produced and circulated to any environmental authority consulted during the SEA process.	None.	None.
	<p>Future Amendments to the Plan</p> <p>You should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan</p>	Noted.	None.	None.
Sea Fisheries coordination DAFM	<p>Ireland’s seafood industry (fishing and aquaculture) is one of the key stakeholders operating in the marine area and plays a vital role in the sustainability of our coastal communities. Over 15,000 people are employed around our coast both</p>	Noted. It was noted that Kilkenny is a non-coastal county.	None.	None.





Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	directly and indirectly. Many of these communities have very limited alternative employment and economic activity options. It is therefore essential that the socio-economic reliance on the seafood sector is fully recognised and is factored into any Climate Change Action plan. Fishing and food security is as key a part of Government Policy. Food Vision 2030 recognises and values the role of primary food producers.			
	The Seafood industry is experiencing a period of difficult change, arising from the ongoing consequences of the EU UK Trade and Co-operation agreement which are specific and impactful on Ireland's seafood sector. There is now ever-increasing demand on the marine space from Offshore Renewable Energy (ORE), Marine Spatial Planning, Marine Protected Areas (MPAs), and other environmental measures.	Noted. It was noted that defined Climate Action in Kilkenny's LACAP does not promote or support marine development. The county is non-coastal.	None.	None.
	Our coastal communities and maritime sectors will continue to play a significant role in contributing to our climate goals and will continue to be consulted and supported in the transition to carbon neutrality. The seafood industry, through both the Sectoral Adaptation Plan (Agriculture, Forest and Seafood Climate Change Sectoral Adaptation Plan ) and the annual Climate Action Plan (CAP23 ) continue to support initiatives to improve understanding of our marine area and ensure sustainable resource use, including through bio and circular economy initiatives. These plans require consideration in the SEA process.	The National Climate Action Plan (2023) and Sectoral Adaptation Plans have been considered in the SEA Process. The relationship of the Plan with other relevant Plans and Programmes has been defined in Appendix 1 of the SEA. Inter-plan cumulative effects have been evaluated in Section 7 of the SEA ER.	None.	None.
	Also for consideration in the SEA process is the European Commission's Communication on the energy transition of the fisheries and aquaculture sector as part of its Fisheries Policy Package. This proposes the establishment of an Energy Transition Partnership (ETP) to develop a roadmap for the energy transition of the sector towards climate neutrality by 2050. The roadmap will set out investment needs, sector initiatives and inform policy decisions to help achieve this	It was noted that Kilkenny is a non-coastal which does not have a seafood sector.	None.	None.



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	transition. The ETP is a multi-stakeholder platform intended to promote co-operation, knowledge sharing and dialogue between private and public stakeholders in order to accelerate the energy transition in the fisheries and aquaculture sector. This Partnership will help to shape the development of future transitional actions for Ireland's seafood sector. Local authorities should include relevant steps to support a Just Transition for the sea fisheries and aquaculture sectors in their Climate Action Plans.			
Inland Fisheries Ireland	County Kilkenny contains waters from the Nore, Barrow and Suir catchments. In total, Kilkenny County Council are responsible for 95 Surface Water bodies, 37 of which are currently achieving their Water Framework Directive (WFD) objectives and 58 which don't – 39% and 61% respectively, significantly below the national average. There are also six transitional water bodies within or bordering Kilkenny County Council's functional area. According to the EPA's most recent assessment (2022) none of these transitional waters are meeting Good Ecological Status.	Noted.	None.	None.
	Almost the entirety of the Barrow, Nore and Suir main channels and their transitional waters are within an SAC designated area, as well as significant stretches of their main tributaries, including the Arrigle, Little Arrigle, Dinan, Kings and Munster Rivers (Nore), and the Duiske (Barrow). The Barrow-Nore SAC and the Suir SAC support several fish species listed in Annex II of the Habitats Directive, including Atlantic Salmon, River Lamprey, Brook Lamprey, Sea Lamprey, and Twaite Shad, as well as other species important for freshwater ecology, such as Freshwater Pearl Mussel. These rivers also hold important populations of European Eel, listed by the IUCN as Critically Endangered. Atlantic Salmon has recently been re-classified by the IUCN as Near-Threatened.	Noted.	None.	None.



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	<p>IFI requests that proposed Climate Actions are consistent with the maintenance/restoration of water bodies to at least Good Ecological Status, and where relevant, with achieving conservation objectives within designated areas. Actions impacting watercourses should be aligned with the latest research and guidelines from competent bodies and statutory agencies tasked with their protection.</p> <p>For example, IFI are collaborating with other stakeholders on an applied Climate Change Mitigation Research Programme (CCMRP), which focuses on the impacts of climate change on inland waters. IFI is also taking the lead on the National Barrier Mitigation Programme 2024 – 2027 (NBMP), with funding from the Department of Housing, Local Government and Heritage and the Department of the Environment, Climate and Communications. The aim of the NBMP is to improve river hydromorphology and connectivity by targeting structures degrading river form, flow and function, and thereby mitigating barriers to fish passage.</p>	<p>Climate actions defined in the Plan support the protection and enhancement of watercourses, including biodiversity and aquatic habitat.</p> <p>The SEA produced recommended a suite of mitigation measures in response to climate actions considered to have potentially significant environmental effects, including on receiving waterbodies.</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>Attention was drawn, in particular, to EGP 5:  <i>“Promote the carrying out of climate action related projects underpinned by the plan in a manner that supports climate action water quality co-benefits, and the achievement of Water Framework Directive objectives”</i></p> <p>It was recommended the local authority have further regard to these comments during plan implementation.</p>	None.	None.
	<p>Kilkenny County Council has an important statutory role to play in protecting water quality through its powers under the Planning and Development Acts, the Local Government (Water Pollution) Acts and the Good Agricultural Practices Regulations.</p>	Noted.	None.	None.



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	Article 5 of the Surface Water Regulations (SI 272 of 2009) requires that a public authority shall not knowingly cause or allow deterioration in the chemical or ecological status of a body of surface water. Article 28(2) states that a surface water body whose status is determined to be less than Good shall be restored to at least Good status. IFI requests that among the Key Performance Indicators which should be considered for the Plan are the number of water bodies achieving High or Good Ecological Status as defined by the WFD within the life-cycle of the Climate Action Plan.	Noted. The environmental effects of Plan implementation will be monitored through the defined Strategic Environmental Objectives (SEOs).  SEOs relating to surface waters have been defined (SEO W1 and W3). Targets and indicators have been defined for these SEOs.	Targets and indicators for SEO W1 and W3 have been updated in light of this IFI commentary.	None.
	IFI requests that where a proposed activity or development has potential to have a significant effect on the biological, hydromorphological or chemical status of a watercourse, it is referred to IFI in accordance with the legislation. IFI also advocates for the application of the precautionary principle (Rio Declaration, 1992) when considering fisheries and aquatic resources. Where there is a threat of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.	Noted.  It was noted that the SEA Environmental Report has been constructed in such a manner that all Actions created by the Local Authority have been considered and any potentially significant environmental effects thereof have been mitigated against, including effects on receiving waterbodies.  It was recommended the local authority have further regard to these comments during plan implementation, and in particular during the planning and carrying out of development projects supported by defined climate action.	None.	None.
	<b>Comments on Environmental Governance Principles:</b> <u>EG1</u> : Building climate resilience of our watercourses involves multiple co-benefits, including improved water quality, reduced flooding, lower vulnerability to droughts, enhanced biodiversity and improved carbon sequestration. Particularly where river hydromorphology has been degraded, proper restoration and rehabilitation of watercourses can improve every aspect of a river's overall ecological health. Restoration techniques are available in IFI's publication Fish and Habitats: Science and Management (Volume 2) River Restoration Works (2020), available <a href="#">here</a> .	Noted.  It was recommended the local authority have further regard to these comments during plan implementation.	None.	None.



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	<p><u>EG2:</u> More sustainable / regenerative farming practices contribute to soil health, biodiversity, water quality and climate mitigation. The restoration of wetlands and riparian vegetation also provides co-benefits for biodiversity, flood and drought resilience and carbon sequestration. They also protect water quality, through mitigating and attenuating the discharge of contaminated waters by infiltration to groundwater or by run-off to surface waters</p>	<p>Noted. It was recommended the local authority have further regard to these comments during plan implementation.</p>	None.	None.
	<p><u>EG3:</u> As stated in the introduction above, proposed actions must be consistent with the maintenance/restoration of water bodies to at least Good Ecological Status, and where relevant, with achieving their Natura2000 conservation objectives.</p>	<p>Noted and agreed. The Plan has been designed to support and be in harmony with water quality objectives.</p>	None.	None.
	<p><u>EG4:</u> IFI recommends an integrated, catchment-based approach to flood mitigation and flood management. For example, flood protection can be enhanced by retaining and restoring connectivity between rivers and their natural floodplains, i.e. lateral connectivity. Flood storage capacity can be significantly increased through channel and habitat restoration in and adjacent to watercourses. For example, restoring sinuosity to artificially straightened river channels increases habitat diversity and natural storage.</p> <p>Restoration of natural flood storage increases watercourse resilience to extreme weather events. Plans to improve flood resilience should also consider the protection of vulnerable areas for recreational and amenity use rather than development, for example as recommended by IFI's Planning for Watercourses in the Urban Environment (2020).</p>	<p>Noted. The plan is supportive of using nature-based solutions for flood mitigation and management. It was recommended the local authority have further regard to these comments during plan implementation.</p>	None.	None.
	<p><u>EG6:</u> See comments for EG1 above</p>	<p>Noted. It was recommended the local authority have further regard to these comments during plan implementation.</p>	None.	None.
	<p><u>EG7:</u> See comments for EG1, EG2 and EG4.</p>	<p>Noted. It was recommended the local authority have further regard to these comments during plan implementation.</p>	None.	None.



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	<p><b>EG8:</b> Barrier removal and mitigation is an important aspect of building watercourse connectivity and resilience. IFI recently launched the National Barriers Mitigation Programme. This is a new capital programme with cross-departmental support to mitigate, and remove where possible, the environmental impact of river barriers. Restoring longitudinal connectivity in watercourses through barrier removal should be an explicit goal in the climate action plan.</p>	<p>Noted. It was recommended EG8 be further clarified by rewording it to as follows:          ‘Support opportunities to improve and restore ecological connectivity of non-designated habitats and sites (including watercourse connectivity) to improve overall ecosystem resilience and functioning while supporting climate action within the county.’          The intended meaning and scope of the Environmental Governance principles remains the same.</p>	EG8 updated as described.	EG8 updated as described.
	<p><b>EG9:</b> The protection of riparian zones and instream hydromorphology also provides protection against invasive species. For example Dace, a fish species listed in the third schedule of the Birds and Habitats Regulations (SI 477 of 2011), is now widespread in the Barrow and Nore catchments. However, restoring natural habitat diversity can provide more favourable competitive advantage to native salmonid species.</p>	<p>Noted. It was recommended EG9 be further clarified by rewording it to as follows:          ‘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. All supported projects shall align with the goal of appropriately protecting, restoring and enhancing terrestrial and aquatic habitat and conditions to support the promotion of native species.’          The intended meaning and scope of the Environmental Governance principles remains the same.</p>	EG9 updated as described.	EG9 updated as described.
	<p><b>EG10:</b> The recently agreed EU Nature Restoration Law includes targets to restore drained peatlands to reduce agricultural sector emissions and improve biodiversity. Peatland restoration improves biodiversity and also builds climate resilience in freshwater systems in drought and extreme rainfall events. The use of cutover peatlands for commercial afforestation with non-native species should be avoided.</p>	<p>Noted.          It was suggested that EGP 10 be further clarified and updated to include the following phrase: “with any associated planting using native species, where appropriate” after the word “maintenance.”          EGP10: Support opportunities to promote peatland restoration, rehabilitation and maintenance inclusive of biodiversity enhancement while achieving climate targets through the implementation of the climate actions within the plan.</p>	EG10 updated as described.	EG10 updated as described.



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
		The intended meaning and scope of the Environmental Governance principles remains the same.		
	<p><b>Kilkenny Climate Actions</b></p> <p>1.9:                      See comments for EG4 above. IFI recognises the necessity of flood management, however there is a need to move to an integrated, catchment-based approach which includes the restoration of fisheries habitat for native species such as salmon. The cumulative effects of land drainage and inappropriate flood protection measures have had severe impacts on river hydromorphology. Any beneficial outcomes are usually localised, short-term and ultimately counterproductive. Very often they require ongoing annual investment which is economically as well as ecologically unsustainable. IFI advocates a landscape-scale, catchment management approach to flood protection and drainage. Responses to flooding and climate concerns require a broad perspective for the benefit of people and the wider landscape. Any amendment to a river, or its environs, has to be executed in a manner that is mindful of biodiversity, fish, and habitat protection.</p>	<p>Noted.</p> <p>It was noted flood relief action defined in the Plan will be progressed under the Catchment and Flood Risk Assessment Programme, which takes a catchment based approach to identifying and managing flood risk.</p> <p>Attention was drawn to the multiple mitigation measures produced during the SEA Environmental Report and NIR process for this LACAP that mitigate against potentially significant environmental effects on biodiversity, flora and fauna and the water environment.</p>	None.	None.
	<p>2.11:                      The water quality impact of run-off of micro-pollutants, including heavy metals, hydrocarbons, and microplastics from roads and other hard surfaces, is greatly underestimated. SuDS or similar passive treatment systems should be mandatory in road developments. Retrofitting SuDs should also be considered where possible. An audit of road drainage is required, accompanied by the implementation of measures to mitigate run-off.</p>	<p>Noted. It was noted that this action includes the mitigation measure “ensure such development promotes climate action co-benefits, including SuDS, and nature-based solutions, and does not contravene relevant environmental protection criteria or cause significant negative environmental effects”. This mitigation measure is intended to capture the potentially significant environmental effects of runoff micropollutants mentioned, amongst other effects.</p>	None.	None.



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
		It was recommended the local authority have further regard to these comments during plan implementation.		
	2.17: See comments for 2.11 above. In addition, works on water crossings should comply with IFI's Guidelines on Protection of Fisheries during Construction Works in and adjacent to Waters. Where alterations to existing crossings are proposed, these should be upgraded to allow for fish passage where required. For example, see the OPW's Design Guidance For Fish Passage On Small Barriers (2021) prepared in conjunction with IFI. Instream works should only take place during the period 1 July to 30 September and should be accompanied by method statements.	Noted. It was noted that this action includes the mitigation measure "having due regard to the need to promote nature-based solutions and Sustainable Drainage Systems, and environmental sensitivities, including water quality, biodiversity and European sites." This mitigation measure is intended to capture the potentially significant environmental effects of construction works on/near watercourses. It was recommended the local authority have further regard to these comments during plan implementation.	None.	None.
	3.1: An ecologically sensitive tree strategy can improve climate resilience, water quality and biodiversity. IFI's publication Fish and Habitats: Science and Management (Volume 2) River Restoration Works (2020), provides detailed guidance on restoration strategies, including tree planting. In particular, see Section 3.2.3 on Tree planting and Management. The use of cutover peatlands for commercial afforestation with non-native should be avoided.	Noted. It was recommended the local authority have further regard to these comments during plan implementation.	None.	None.
	3.2: See comment for 3.1 above	Noted. It was recommended the local authority have further regard to these comments during plan implementation.	None.	None.
	3.3:	Noted. The requirements for Invasive Species Management for certain development projects has	None.	None.





Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	IFI welcomes this action. Developers on sites containing invasive species should be required to devise and implement invasive species management plans with appropriate biosecurity protocols to prevent the introduction and spread of invasive species. See also comments for EG9 above.	been defined under the Kilkenny City and County Development Plan 2021.		
	3.4: IFI would welcome the extension of such programmes to riparian zones. Many aquatic invertebrates are dependent on suitable riparian vegetation for the free-flying stage in their lifecycle.	Noted. The Council intends on applying this action at Council lands within its remit, including potentially riparian zones as the case may be.	None.	None.
	3.5: Pesticide and herbicide residues and metabolites in the environment can be extremely harmful to human and animal health. These substances can be lethal to aquatic life at extremely low concentrations (parts per billion). IFI advocates the complete elimination of the use of chemical pesticides and herbicides on bridges and in riparian zones.	Noted. Action 3.5 supports the elimination of pesticide use on Councils lands.	None.	None.
	3.6: River habitat restoration measures can improve instream conveyance capacity and flood retention. In addition, they contribute to restoring and augmenting populations of native fish species and improve climate resilience. They can reduce the threat of invasive species, reduce the carbon footprint of future maintenance works and result in significant financial savings. IFI hope to establish pilot projects in the upper Barrow to investigate restoration projects. Such projects could provide a template for a national river restoration programme.	Noted and agreed.	None.	None.
	3.7: IFI supports the use of nature based solutions in infrastructural, commercial and residential development. Incorporating Sustainable Drainage Systems (SuDS) into site layout and design can attenuate pollution and add amenity and recreational value. The Department of Housing, Local Government and Heritage has published a best practice	Noted. It was recommended the local authority have further regard to these comments and the referenced guidelines during plan implementation.	None.	None.



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	<p>guidance document on SuDs – Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas (2021).</p> <p>IFI also encourage self-rehabilitation of a river system by being “left alone”. Ceasing activities such as channel maintenance, drainage, vegetation clearance or animal access allows time for the natural fluvial processes of erosion and deposition to be restored to equilibrium.</p>			
	<p>3.8: See comments for 3.7 above. Biodiversity enhancement should ensure that a development has a measurably positive impact ('net gain') on biodiversity. Enhancement metrics should be clearly established in advance e.g. length of riparian habitat restored, or water bodies restored to Good Ecological Status. Percentage biodiversity enhancement targets should be imposed for new developments.</p>	<p>Noted. The Plan targets biodiversity enhancement. A variety of Biodiversity related Strategic Environmental Objectives which measure potential positive biodiversity effects of Plan implemented have been defined for the Plan.</p> <p>It was noted the Kilkenny City and County Development Plan 2021 prescribes development management standards to promote biodiversity enhancement.</p>	None.	None.
	<p>3.10: IFI welcomes the inclusion of this action. IFI requests that this includes a review of abstraction licences from surface and groundwaters to ensure that depletion does not impede fish passage or survival, nor compromise the attainment of WFD objectives. IFI also ask that a review be undertaken of discharge licences issued by the Local Authority under Section 4 of the Local Government (Water Pollution) Act, 1977 (as amended). This review should consider the impacts of prolonged drought periods on assimilative capacity and mass balances in receiving waters. Target water quality standards in receiving waters should satisfy the parameter limits in the Surface Water Regulations (SI 272 of 2009) at the point of discharge. Waterbodies identified under action 3.10 can also be prioritised for habitat restoration and enhancement to improve climate resilience, as well as the co-benefits identified in EG1 above.</p>	<p>Noted. There is merit in considering how climate change influenced drought periods may impact the receiving water environment. It was recommended Action 3.10 (as referenced in the Environmental Report and Natura Impact Report) be updated in light of this commentary, and having regard to remit of a local authority generally.</p>	None.	None.



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	3.11: See comments for EG3 and Action 3.10 above.	Noted.	None.	None.
	4.12: Compliance with the requirements of the Good Agricultural Practices Regulations, particularly in relation to storage capacity and soiled water is critical, particularly if EPA projections of warmer, wetter winters are realised. <u>Risk mitigation measures such as improved riparian corridors should be encouraged.</u> The maintenance / restoration of natural wetlands also contributes to climate mitigation and adaptation both locally and on a catchment level. The application of fertilisers in the vicinity of Natura 2000 sites should also be assessed in the context of CJEU Rulings C-293/17 and C-294/17, where this may pose a risk to meeting the conservation objectives of such designated areas. See also comments for EG2 above. More sustainable / regenerative farming practices can protect water quality as well as contributing to soil health, biodiversity and climate mitigation, through reductions in methane and nitrous oxide emissions.	Noted.	None.	None.
	CAP Suggested Actions In addition to the foregoing Climate Actions IFI also requests consideration of the following: <ul style="list-style-type: none"> <li>• In addition to the comments in Action 3.8 above, IFI requests that any new developments, including proposed Climate Actions, are consistent with the maintenance/restoration of water bodies to at least Good Ecological Status, and where relevant, with achieving conservation objectives within designated areas.</li> <li>• A commitment to restore habitat connectivity in aquatic habitats. Further to the comments in EG4 and EG8 above, this should include longitudinal connectivity (barrier removal) and lateral connectivity (restoration of wetlands and floodplains).</li> <li>• In support of this, new water crossings or alterations to existing water-crossings, whether on public roads or in private developments, should be compatible with the</li> </ul>	Noted. The LACAP has been shaped by SEA and AA processes to ensure all activities and development supported by climate defined in the Plan will be undertaken in accordance with these water quality and conservation objectives. A strong plan-level commitment to restoring habitat connectivity has been made in the Plan. The LACAP has been shaped by SEA and AA processes to ensure all activities and development supported by Plan action will be undertaken having due regard to water quality, hydrological and biodiversity related sensitivities.	None.	None.



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	<p>upstream and downstream migration of native fish species, and adhere to IFI's Guidelines on Protection of Fisheries during Construction Works.</p> <ul style="list-style-type: none"> <li>• That the Local Authority should seek to identify missed connections in housing developments and restore connectivity to the mains sewerage network where necessary</li> <li>• That the CAP should include a commitment to protect the spawning habitat of fish and prohibit the removal of gravel from rivers and streams</li> <li>• Enforce the Good Agricultural Practice (GAP) regulations, particularly in relation to water quality. Agriculture is listed by the EPA as the single most common pressure on surface waterbodies, and the most common reason for their failure to meet Good ecological status</li> </ul>	The implementation of the LACAP will promote water quality and biodiversity co-benefits insofar as the Council's remit extends.		
	<p>Due recognition should also be given to the value of watercourses as amenity areas which can provide a natural setting for outdoor recreation in a safe environment. The Local Authority should consider introducing river corridor management plans and provide a mechanism for the strategic integration of rivers and wetlands into development plans</p>	Noted.	None.	None.
DAERA - NIEA	<p>DAERA are broadly content with the conclusions of the SEA Environmental Report and Natura Impact Statement. 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 DAERA.</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 of Plan Action are controlled at the source.</p>	<p>The SEA ER has been updated to include a clear statement on transboundary effects, explaining how they were considered and mitigated.</p>	None.



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	<p>Whilst DAERA acknowledge that due to the distance of the Kilkenny LACAP plan area from Northern Ireland, transboundary impacts are unlikely.</p> <p>We would have preferred the SEA Environmental Report to contain a clear statement indicating the opinion about whether the implementation of the 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.</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 of Plan Action are controlled at the source.</p>	<p>The SEA ER has been updated to include a clear statement on transboundary effects, explaining how they were considered and mitigated.</p>	<p>None.</p>
	<p><b>Natural Environment Division (NED) Comments</b></p> <p>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.</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>
	<p><u>SEA Environmental Report</u></p> <p>NED note that in section 7.2 of the environmental report it states that the evaluation considers transboundary effects. As the environmental report does not contain a specific section on the consideration of transboundary effects on Northern Ireland, we therefore assume all mitigation and monitoring measures outlined in the ER in relation to biodiversity, flora and fauna would 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 DAERA.</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 of Plan Action are controlled at the source.</p>	<p>The SEA ER has been updated to include a clear statement on transboundary effects, explaining how they were considered and mitigated.</p>	<p>None.</p>
	<p>NED would also suggest the inclusion of the following in the environmental report;</p> <p>The Wildlife (NI) Order 1985 (as amended)</p> <p>Wildlife and Natural Environment Act (NI) 2011</p>	<p>Noted. The distance and lack of environmental pathways between Co. Kilkenny and Northern Ireland was noted.</p>	<p>Northern Irish plans and programmes have been reviewed and included in the SEA ER.</p> <p>Northern Irish data sources, indicators and targets have</p>	<p>Northern Irish plans and programmes have been reviewed and included in the NIR.</p>



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	<p>The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended)</p> <p>The Environment (NI) Order 2002</p> <p>The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017</p> <p>The Strategic Planning Policy Statement (SPPS) for Northern Ireland</p> <p>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.</p> <p>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></p> <p>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></p> <p>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>.</p> <p>The Draft Green Growth Strategy <a href="https://www.daera-ni.gov.uk/consultations/ni-peatland-strategy-consultation">Consultation on the draft Green Growth Strategy for Northern Ireland   Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk)</a></p> <p>Northern Ireland Energy Strategy 2050 <a href="https://www.daera-ni.gov.uk/consultations/ni-peatland-strategy-consultation">Northern Ireland Energy Strategy 2050   Department for the Economy (economy-ni.gov.uk)</a></p> <p>NED welcome the mitigation and monitoring measures outlined in the SEA for biodiversity flora and fauna provided these will also apply to species and habitats in Northern Ireland. DAERA would recommend the inclusion of Northern Irish data sources, indicators and targets to ensure that the environment within Northern Ireland is protected. The annual Northern Ireland Environmental Statistics Report and Northern Ireland State of The Environment Report should be included as monitoring indicators. These can be found at, <a href="https://www.daera-ni.gov.uk/consultations/ni-peatland-strategy-consultation">State of the Environment Report 2013   Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk)</a></p>		<p>also been consulted and included in the report.</p>	



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	<p><a href="#">Northern Ireland environmental statistics report   Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk)</a></p>			
	<p><b>Air Quality Biodiversity Unit Comments</b>            AQBUs acknowledge the objectives to reduce air pollution within County Cavan.            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. 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.            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 Critical Levels/Loads for each qualifying feature and background levels of these pollutants: <a href="#">APIS app   Air Pollution Information System</a></p>	<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>
Kilkenny LEADER Partnership Submission to Kilkenny County Council's	<p><b>Rivers and Water</b>            Climate change poses some of its most serious issues for the vulnerable waterways of Kilkenny. The iconic "Three Sisters": the Barrow, Nore and Suir river catchments define the county and influence the quality of social, economic, cultural and crucially environmental life of the citizenry and our visitors.</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>
	<p><b>Flooding</b>            Climate change impacts through a myriad of ways on the waters, notably and visually dramatically in terms of flooding of towns and villages. While the Office of Public Works (OPW) has key line agency responsibility for flood protection</p>	<p>Noted. It was recommended that the LA consider this as appropriate.</p>	<p>None.</p>	<p>None.</p>



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	<p>nationally, there are financial and environmental limits to its ability to prevent or mitigate flooding through the traditional means of 'hard engineering' of barriers, wall, etc.</p> <p>But this limit leaves many areas of the county unprotected. KLP proposes that communities and landowners be encouraged to investigate and develop technical and appropriately assessed plans for the use of 'natural flood defences' in the county. KLP is prepared to assist in this work.</p>			
	<p><u>River Trusts</u></p> <p>The Nore River Catchment Trust (NCRT) operating through the 'Nore Vision' initiatives across three counties of the river system has had a marked impact on the awareness of the rivers and waters as a valued and vulnerable resource. Climate Change has significantly added to the vulnerability of the catchment in terms of habitat protection, biodiversity and water quality. The work of the staff and volunteers of the NCRT on the effecting practical work, in terms of invasive species eradication, 'citizen science' data gathering, promotion of the assets of the rivers and their endangerment from climate change- and other factors, has been recognised by a broad range of civil society and statutory bodies. KLP proposes that NCRT- and other river trust bodies in the county be formally recognised for their work and role- and be supported in material and other means in their work in engaging with communities, businesses and agencies towards a more sustainable strategy for our County's waterway that are particularly exposed to the effects of climate change.</p>	Noted. It was recommended that the LA consider this as appropriate.	None.	None.
Uisce Éireann	<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 paces and also</p>	Noted.	None.	None.





Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	<p>generate capacity for compact growth as set out in the National Planning Framework.</p> <p>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 UE. 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 “Identify and implement actions to improve drainage on the Regional and local road network, and identify infrastructure at risk from climate event, having due regard to the need to promote nature based solutions and Sustainable Drainage Systems, and environmental sensitivities, including water Quality, biodiversity and European sites”.</p>			
	<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 NGSG 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>This commentary related to the core focus of the plan and did not address SEA or AA issues or documentation. It was recommended the local authority consider this submission, as appropriate.</p>	None.	None.
	<p><b>Water Demand</b></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</p>	<p>This commentary related to the core focus of the plan and did not address SEA or AA issues or documentation. It was recommended the local authority consider this submission, as appropriate.</p>	None.	None.



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	<p>locals to facilitate process water reuse from one industry to another. We would welcome water use efficiency to be included as an objective/action in the plan.</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>We welcome the council's commitment to "Investigate the feasibility of local authority led/supported alternative heating systems and fuels including District Heating and Geothermal".</p> <p>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>	Noted.	None.	None.
	<p><b>Circularity and Bioeconomy</b></p> <p>We welcome Kilkenny County Council's commitment to "implement Nature-based Solutions and biodiversity enhancement in new Kilkenny County Council developments".</p>	Noted.	None.	None.
	<p><b>Potential impacts on UE Water Sources &amp; Infrastructure</b></p> <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,</p>	<p>Noted. The potential effects on material assets have already been considered and mitigated against under the SEA process. 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 provide a more express commitment to not adversely impact Irish Water assets in response to this submission. Further, it was recommended the Council have appropriate regard to this submission when</p>	None.	None.



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	<p>requirement to programme upgrade works in advance of road project.</p> <p>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 Practice, 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>	<p>commencing and advancing project level development supported by the defined climate actions.</p>		



## 2.5 SEA and Plan Modifications

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

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

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

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

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

**Table 2-5: Plan Action Modifications**

Action	Summary of Modification
EGP8	This Environmental Governance Principle has been reworded to include the words 'and restore' and '(including watercourse connectivity)': Support opportunities to improve <b>and restore</b> ecological connectivity of non-designated habitats and sites <b>(including watercourse connectivity)</b> to improve overall ecosystem resilience and functioning while supporting climate action within the county.
EGP9	This Environmental Governance Principle has been reworded to include the sentence 'All supported projects shall align with the goal of appropriately protecting, restoring and enhancing terrestrial and aquatic habitat and conditions to support the promotion of native species.': Ensure local authority projects supported by plan actions have taken the necessary precautions to identify and manage invasive species, particularly with regard to Schedule III species. No local authority climate action related development project that is likely to cause the spread of invasive species listed in Schedule III shall be supported. <b>All supported projects shall align with the goal of appropriately protecting, restoring and enhancing terrestrial and aquatic habitat and conditions to support the promotion of native species.</b>
EGP10	This Environmental Governance Principle has been reworded to include the words 'inclusive of biodiversity enhancement,': Support opportunities to promote peatland restoration, rehabilitation and maintenance <b>inclusive of biodiversity enhancement</b> , while achieving climate targets through the implementation of the climate actions within the plan.



Action	Summary of Modification
1.14, 1.15, 1.16, 1.17, 1.18, 1.19	These actions to be included in Table of Action 5.5 of the LACAP.
2.26	The following action has been reworded to include the text 'and Bioenergy': Investigate the feasibility of local authority led/supported alternative heating systems and fuels including District Heating, Geothermal, and Bioenergy.
2.27	The following action has been reworded to include the text 'To develop a policy on Disaster Risk Management and': To develop a policy on Disaster Risk Management and undertake Climate Risk Assessments of Local Authority owned heritage assets.
4.2	The following action has been reworded to include the text 'grant schemes and' and 'Heritage Grants': Support communities to deliver local climate and sustainability actions, through grant schemes and programmes such as Sustainable Energy Communities, Tidy Towns, GAA Green Clubs, Green Schools and Heritage in Schools, Heritage Week, Heritage Grants, National Biodiversity Week, Creative Ireland and Cruinnui na nOg.
4.4	The following action has been reworded to include the text 'and other relevant health programmes': Support climate awareness and resilience through the Healthy Ireland Programmes, and other relevant health programmes.
5.5	The following action has been reworded to include the text 'and social enterprises': Support local businesses and social enterprises to optimise opportunities in the green tech and circular/green economy.
5.16	The following action has been reworded to include the text 'and other appropriate locations,' and exclude 'Dunmore': Explore the potential to repurpose, upcycle and/or to use waste collected at Civic Amenity Sites, and other appropriate locations, to generate new products and enterprises, having due regard to the need to comply with relevant provisions of the Waste Management Act.
DZ actions 1 to 4	These DZ actions have been removed from Table of Action Section 5.5 of the LACAP and remain only in Section 6.6.



## 3. CONSIDERATION OF ALTERNATIVES

### 3.1 Introduction

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

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

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

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

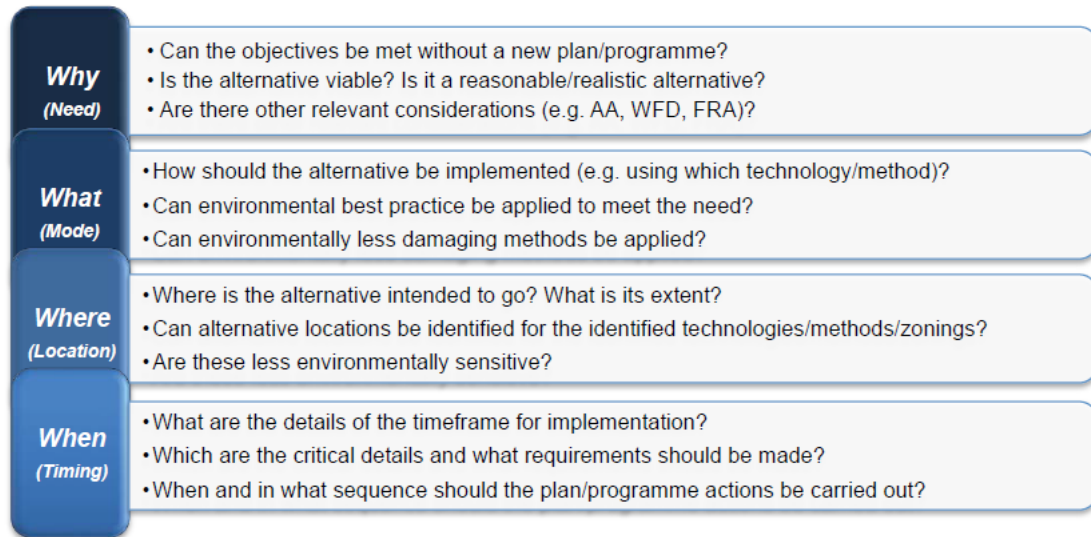
### 3.2 Approach to Developing Reasonable Alternatives

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

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



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



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

### 3.3 Identification and Description of Reasonable Alternatives

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

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



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

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





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

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

Alternative 1 - The Pareto Approach - would lead to some positive environmental effects and would 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.



## 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.

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

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

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

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



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

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



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

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



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	B3	Support Article 10 of the Habitats Directive with regard to the management of features of the landscape which - by virtue of their linear and continuous structure or their function as stepping stones (designated or not) - are of major importance for wild fauna and flora and essential for the migration, dispersal and genetic exchange of wild species.	Condition of features of the landscape which - by virtue of their linear and continuous structure or their function as stepping stones (designated or not) - are of major importance for wild fauna and flora. Linear meters of riparian corridors enhanced with native planting. 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.	No adverse impacts on the condition of features of the landscape which - by virtue of their linear and continuous structure or their function as stepping stones (designated or not) - are of major importance for wild fauna and flora as a result of plan implementation. Increase linear metres of riparian corridor enhanced with native planting. Reduce habitat fragmentation or breaks. Increase number of developments consented that have significant greenspace proposals.	Internal monitoring of likely significant environmental effects of development projects. Mapping of LR important habitats and species as part of the County Biodiversity Plan.
	B4	To avoid or minimize significant impacts on semi-natural habitats, species, environmental features, or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed for designation; and to comply with the Wildlife Acts 1976-2012 with regard to listed species.	Condition of semi-natural habitats, species, environmental features or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed for designation.	No adverse impacts on condition of semi-natural habitats, species, environmental features or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed for designation, as a result of plan implementation.	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 the CDP. No. of developments consented that have significant greenspace proposals.	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.	Internal monitoring of compliance with CDP Policy Objectives. 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
			<p>Improved biodiversity areas (Area km<sup>2</sup> /length metres).</p> <p>Compliance of development supported by the plan with policies providing for the protection and enhancement of Biodiversity and flora and fauna.</p>	<p>Increase quantum of improved biodiversity areas.</p> <p>No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna.</p> <p>Planning consent for development proposals supported by the plan only to be granted where development complies with policy supportive of biodiversity protection and enhancement.</p>	
Landscape & Visual Amenity	L1	Avoid or, minimise impacts to statutory landscape designations defined in the CDP.	<p>Status of Landscape Character Areas, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects.</p> <p>Number of developments consented that result in avoidable adverse impacts on Landscape Character Areas, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects.</p> <p>Number of areas in the local authority functional area designated for their landscape character.</p>	<p>All action and development proposals supported by the plan must comply with policy objectives relating to the protection of Landscape Character Areas, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects defined in the CDP.</p> <p>No development supported by the plan should have an adverse impact on Landscape Character Areas, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects.</p>	<p>Internal monitoring of compliance with CDP Policy Objectives.</p> <p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Review of future iterations of the Landscape Character Assessment.</p>
	L2	Avoid or minimise adverse visual effects on residential receptors or other sensitive visual receptors.	<p>Number of developments consented that result in avoidable adverse visual impacts on residential receptors or other sensitive visual receptors.</p> <p>Number of areas in the local authority functional area designated for their visual amenity.</p>	<p>No development supported by the plan should have a significant adverse visual impact on residential receptors or other sensitive visual receptors.</p>	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Review of future iterations of the Landscape Character Assessment.</p>



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
				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.	
Cultural Heritage - Archaeology & Architectural	CH1	Avoid impacts upon archaeological heritage (including entries to the Record of Monuments and Places (RMP)) and architectural heritage (including entries to the Record of Protected Structures (RPS) and National Inventory of Architectural Heritage (NIAHs)).	<p>Percentage of features contained in the RMP (and, where relevant, the associated surrounding context) protected from adverse effects due to action and development occurring as a result of this plan.</p> <p>Percentage of features contained in the RPS and NIAH (and, where relevant, the associated surrounding context) protected from adverse effects due to action and development occurring as a result of this plan.</p>	<p>No features contained in the RMP (nor the associated surrounding context) should be significantly adversely affected as a result of the implementation of this plan.</p> <p>No features contained in the RPS and NIAH (nor the associated surrounding context) should be significantly adversely affected as a result of the implementation of this plan.</p>	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Consultation with the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media</p> <p>Review of Heritage Plan environmental effect monitoring</p>
Soils	S1	Avoid or minimise effects on mineral resources or soils.	Number of instances of significant adverse impacts on mineral resources or soils occurring, including the pollution, loss or degradation of mineral resources or soils, as a result of action and development supported by the plan.	No instances of significant adverse impacts on mineral resources or soils occurring as a result of action and development supported by the plan.	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Consultation with Geological Survey of Ireland and review of published data on the soils environment.</p>
Land Use	LU1	Avoid or minimise effects on existing land use.	Number of instances of significant adverse impacts on existing land use as a result of plan implementation.	No instances of significant adverse impacts on existing land use as a result of plan implementation.	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Review of Land Use, Land Use Change and Forestry related Greenhouse Gas emissions calculated in the Baseline Emission Inventory.</p>





Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
Air Quality and Noise	AQN1	Increase the number of people travelling to work or school via public transport or by non-mechanical means.	% change in modal split. Length of new sustainable transport routes developed.	Reduction in private car use. Extension and improvement of the sustainable transport network in the plan area.	Central Statistics Office (CSO) Population data - Commuting in Ireland. Internal monitoring of length of new sustainable transport routes developed.
	AQN2	Avoid or minimise effects on local air quality.	Number of developments consented that result in avoidable adverse air quality impacts on sensitive receptors. Number of exceedances of ambient air quality standards in the County, as monitored under the EPA's National Ambient Air Quality Monitoring Network. Improvements in air quality status in the county.	No development supported by the plan should have a significant adverse air quality impact on sensitive receptors. All development supported by the plan should adhere to relevant Development Management Standards defined in the CDP relating to the protection of air quality. Minimise ambient air quality standard exceedances in the County.	Internal monitoring of likely significant environmental effects of development projects. Consultation with the EPA. Review of EPA Air Quality Monitoring undertaken in the County. Review of EPA annual 'Air Quality in Ireland' Report
	AQN3	Avoid or minimise adverse noise impacts.	Number of sensitive receptors exposed to noise nuisance.	No sensitive receptors exposed to nuisance noise in the County.	Internal monitoring of likely significant environmental effects of development projects. Monitoring of internal noise complaint investigations undertaken. Consultation with the EPA.
Water	W1	Maintain and/or improve, the quality and status of surface waters.	Status of surface water bodies as reported by the EPA Water Monitoring Programme for the Water Framework Directive (WFD) Status of bathing waters as monitored under the Bathing Water Directive. Number of water bodies achieving High or Good Ecological Status as defined by the WFD within the life-cycle of the Climate Action Plan.	Number of Pollution Incidents detected due to poor bathing water quality results. Not to cause deterioration in the status of any surface water or affect the ability of any surface water to achieve 'good status.' 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.	EPA surface water monitoring data and reports. EPA bathing water monitoring data and reports. Review of environmental quality data detailed in the EPA Maps Application



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



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	W5	Prevent impact upon drinking water quality	Number of non-compliances with Drinking Water Quality Standards defined in the European Union (Drinking Water) Regulations 2023.	No non-compliances with Drinking Water Quality Standards defined in the European Union (Drinking Water) Regulations 2023.	EPA Drinking Water Quality Reports. Review of environmental quality data detailed in the EPA Maps Application
Material Assets	MAI1	Avoid or minimise effects on built/amenity assets and infrastructure	Number of incompatible developments (supported by the plan) adversely affecting built/amenity assets and infrastructure.	No incompatible development (supported by the plan) adversely affecting built/amenity assets and infrastructure.	Internal monitoring of likely significant environmental effects of development projects.
	MAI2	Avoid or minimise effects on existing and (where known) planned infrastructure.	Number of incompatible developments (supported by the plan) adversely affecting existing or planned infrastructure, including water supply, wastewater management, energy and transport infrastructure.	No incompatible development (supported by the plan) adversely affecting existing or planned material assets infrastructure.	Internal monitoring of likely significant environmental effects of development projects, including monitoring of effects on other future planned or committed material asset infrastructure projects. Consultation with Irish Water, Gas Networks Ireland, ESB Networks and Transport Infrastructure Ireland.
	MAI3	Promote sustainable transportation.	% change in modal split. Kilometres of permanent segregated cycling network. Kilometres of permanent integrated cycling network. Number of Electric Vehicle charging points in the county. Total Area of road reallocated for sustainable alternatives (m <sup>2</sup> ).	Percentage increase in the number of public transport users in the County Increase kilometres of permanent segregated cycling network. Increase kilometres of permanent segregated cycling network. Increase number of Electric Vehicle charging points in the county. Increase Total Area of road reallocated for sustainable alternatives.	CSO Population data - Commuting in Ireland. Internal monitoring of length of new sustainable transport routes developed.
	MAI4	Promote sustainable waste management.	Tonnes of hazardous waste received at Council Waste Management Facilities annually.	Increase waste recycling in the County. Reduce waste generation in the County.	EPA Waste Statistics. Consultation with the EPA.



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



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



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