

CONSULTANTS IN ENGINEERING, ENVIRONMENTAL SCIENCE & PLANNING

LOCAL AUTHORITY CLIMATE ACTION PLAN

Strategic Environmental Assessment Statement

Prepared for:

Fingal County Council

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Strategic Environmental Assessment Statement

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Abstract: Fehily Timoney and Company is pleased to submit this Strategic Environmental

Assessment Statement for the Fingal Local Authority Climate Action Plan to Fingal 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

Fingal County Council (FCC) have adopted the Fingal 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)¹. The SEA Directive requires that an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.

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

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

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

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

CLIENT: PROJECT NAME: **Fingal County Council**

SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



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.

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

2.1 SEA Scoping

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

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

A copy of this report was made available to the statutory Environmental Authorities. Environmental Authorities made scoping submissions on the SEA Scoping Report. The SEA Scoping Report was finalized in light of these submissions. The SEA Scoping Report, along with SEA scoping consultation submissions and consideration of these submissions by the SEA process, helped communicate and define the scope of the environmental issues which are to be dealt with by the SEA, the methods which will be used to address these issues, and the level of detail required to address these issues, as per the SEA Guidelines³. Summary detail on the scoping consultation submissions received from Environmental Authorities and how these were taken into account during the SEA process is presented in Table 2-1.

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



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

Environmental Authority	Summary on the Scoping Consultation Submission	How was this submission taken into account during the SEA?
Department of Agriculture, Food and the Marine	An overview on how climate resilience could be promoted in agriculture setting was provided (e.g., maintaining a fodder reserve, measures to promote biodiversity and carbon sequestration, measures to improve soil structure and function). An overview on invasive species risk associated with climate change and the need for appropriate need to promote resilience was provided	The content of this submission served to inform the focus of the environmental assessment of agriculture related action defined in the LACAP. It informed the nature and focus of mitigation measures defined for related climate mitigation and adaptation action defined in the LACAP. A number of Environmental Governance principles defined in the LACAP specifically reflect the recommendations contained in this submission.
EPA	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). 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. 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. 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.	The recommendation to ensure climate action defined in the Plan created cobenefits 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 cobenefits is embedded into the Environmental Governance Principle framework defined for the Plan. 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. 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. 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.

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Environmental Authority Summary on the Scoping Consultation Submission		How was this submission taken into account during the SEA?
Department of the Environment, Climate and Communications	Background information on the Geological Survey of Ireland was provided initially in this submission. An overview of county-level geoheritage and groundwater assets and databases was provided. Information was provided on geological, geotechnical, geothermal, natural resources, geochemistry and geophysical data sources. Specific advice on geological/hydrogeological considerations that needed to be taken into account during the making of the Plan was provided, as follows:	Appropriate regard was had to these baseline geological and hydrogeological data sources and considerations during the preparation of the SEA Environmental Report for the LACAP.
	 Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. 	
	Geohazards should be considered during the Plan-making and development processes.	
	 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. 	
Department of Housing, Local Government and Heritage	The Department provided information and further clarity on flora subject to Flora Protection Orders within the county.	Baseline biodiversity information was reviewed carefully, clarified and updated as necessary during the finalization of the SEA Environmental Report,
	The Department welcomed the proposal to carefully examine the impacts of linear projects on biodiversity. It noted the variety of potential impacts	having appropriate regard to the Department's commentary in relation to baseline data on flora protection orders.
	associated with such linear infrastructure. It noted the development of the Royal Canal Greenway may have had a significant impact on biodiversity in the area, including due to artificial lighting.	All advice with respect to the potential impacts of the LACAP was considered during the environmental assessment process. Appropriate mitigation measures were defined and incorporated into the Plan to ensure the
	They advised on the need to consider potential effects on biodiversity due to the carrying out of coastal protection works or renewable energy development.	environmental impacts of linear, coastal and renewable energy projects were suitably mitigated against.

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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 <u>Mitigation through consideration of alternatives</u>

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.

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

Several integrated environmental considerations relating to decarbonising zone opportunities were established to guide plan implementation. These principles are defined in Table 2-4.

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
E8	Engage with independent BREEAM assessor and utilise Building Assessment Methodology throughout delivery of Swords Cultural Quarter flagship project; and extend the assessments under the various indicators from BREEAM and the Build Upon Energy Renovation Framework to Public Buildings. BREEAM is a leading validation and certification system for sustainable built environment.	Attach the following text to the action: Engage with independent BREEAM assessor and utilise Building Assessment Methodology throughout delivery of Swords Cultural Quarter flagship project; and extend the assessments under the various indicators from BREEAM and the Build Upon Energy Renovation Framework to Public Buildings, having appropriate regard to environmental sensitivities such as amenity value, cultural heritage and archaeology that may be impacted by any built development at the Swords Cultural Quarter which is supported by the BREAMM process. BREEAM is a leading validation and certification system for sustainable built environment.
E14	Targeted LED upgrades across smaller FCC premises, not suitable for EPC	Attach the following text to the action: 'while ensuring the lumen levels and spectral range are maintained or reduced/controlled to avoid effects to biodiversity.'
E16	Renewal of remaining 1.5% of public lighting stock & pitch lighting	Attach the following text to the action: 'while ensuring the lumen levels and spectral range are maintained or reduced/controlled to avoid effects to biodiversity.'
E17	Continue to make energy efficiency retrofits to social housing under the DHLGH-supported Energy Retrofit Programme. Ensure FCC's social housing stock has a B2 or cost optimal energy rating where feasible by 2030 (subject to programmes and funding support).	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.'
E18	Complete Pilot programme in Strandmill Estate, Portmarnock, in conjunction with SEAI and REIL offering retrofit upgrades to private homeowners, availing of economies of scale when coupled with public housing upgrades. Partially funded by SEAI government grants.	Attach the following text to the action: Complete Pilot programme in Strandmill Estate, Portmarnock, in conjunction with SEAI and REIL offering retrofit upgrades to private homeowners, availing of economies of scale when coupled with public housing upgrades; having due regard to the need to appropriately conserve and maintain any protected structures subject to upgrades in accordance with relevant protected structures regulations, and environmental sensitivities such as local human receptors, European sites and biodiversity. Partially funded by SEAI government grants.
E25	Deliver Blanchardstown District Heating Scheme	Attach the following text to the action: 'having due regard to the need to protect sensitive aspects of the receiving environment, such as water bodies, biodiversity, flora and fauna, European sites and local population, from potential negative effects of development, including linear development associated with the project.'

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LACAP Action Reference	LACAP Action	Mitigation Measure
E27	Install PV panels on suitable Council roofs such as civic offices, libraries and community buildings	Attach the following text to the action: 'where it is confirmed through a glint and glare assessment that such solar development will not have any potential glint and glare impact on sensitive receptors, or otherwise, where it is confirmed that such solar development constitutes exempted development under the Planning and Development Regulations by virtue of its size or location outside a Solar Safeguarding Zone, and having due regard to all other environmental sensitivities that could be impacted by such development.'
E28	Develop Wind Energy Strategy	Attach the following text to the action: 'having due regard to environmental sensitivities such as archaeology, European sites, biodiversity, the noise environment, landscape character, visual amenity etc.'
E31	Conduct research into the Council's historic building stock that consider pre and post-works energy performance and devise advice on appropriate and sensitive retrofitting/energy upgrading of traditional buildings to inform works to other Council-owned properties and to Guide private owners.	Attach the following text to the action: 'having appropriate regard to the need to protect and conserve the architectural or cultural heritage value that may be associated with such buildings, and protected species that may be present in such buildings.'
E32	Promote and encourage routine maintenance and good housekeeping to maintain the older building stock of the county in good condition in order to reduce energy consumption and extend the building's life-cycle (e.g. Fingal's Stitch in Time Grant, National Schemes of Built Heritage Investment Scheme, Historic Structures Fund, Community Monument Fund).	Attach the following text to the action: 'having appropriate regard to the need to protect and conserve the architectural or cultural heritage value that may be associated with such buildings, and protected species that may be present in such buildings, and all other environmental sensitivities that may be affected by such works such as European sites and biodiversity.'
T1	Increase the meterage of high quality walkways in the county and improve the meterage of existing walkways in the county.	Attach the following text to the action: 'having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.'
T2	Increase the km of protected cycle lanes and off road cycle lanes and greenways in the county annually; in line with the Greater Dublin Cycling Network Plan, and the FCC Greenway Plan - including Fingal Coastal Way, the Sutton to Malahide Cycleway, the Broadmeadow Way, Church Fields Link Road, and the Royal Canal Urban Greenway, etc.	Attach the following text to the action: 'having due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites and cultural heritage.'
Т3	Deliver/alter infrastructure to improve connectivity/permeability in order to promote active travel	Attach the following text to the action: 'having due regard to environmental sensitivities such as European sites and biodiversity.'
T4	Deliver new pedestrian / cycling road crossings, which give priority to pedestrians and cyclists.	Attach the following text to the action: 'having due regard to environmental sensitivities such as European sites and biodiversity.'

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LACAP Action Reference	LACAP Action	Mitigation Measure
	Develop and implement a work programme for the replacement of pedestrian crossings with ones which give priority to pedestrians & cyclists.	
Т5	Install junction build outs in accordance with Design Manual for Urban Roads & Streets 2020, increasing safety to users.	Attach the following text to the action: 'having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.'
T11	Identify opportunities for reallocation of existing road space to promote active travel and improve public space.	Reallocate road space to provide for sustainable travel alternatives, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.
T12	Enhancement / reallocation of roads & street space to promote active travel and improve public space. Implement in all 3 LEAs	Attach the following text to the action: 'having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.'
T18	Implement Safe Routes to School programme	Attach the following text to the action: 'having due regard to environmental sensitivities such as local human receptors, Biodiversity, European sites, water quality and hydrology, and amenity value etc.'
T20	Support the development and expansion of existing public transport services including MetroLink, BusConnects and DART expansion to Balbriggan	Attach the following text to the action: 'whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.'
T21	To facilitate the provision of Park and Ride facilities in appropriate locations at transport nodes and along strategic transport corridors in accordance with the NTA Strategy, and encourage the inclusion of EV charge points and bike parking.	Attach the following text to the action: 'whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.'
T24	Implement the DLA EVCP strategy through delivery of sufficient EVCP's	Attach the following text to the action: 'having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.'
T25	Expand availability of EV charging points for Council staff and operational vehicles	Attach the following text to the action: 'having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.'
T26	Provide EV charging infrastructure (in addition to 20% charge points) to development plan standards, for new social housing developed by the Local Authority. Provide Electric vehicle charge points in car parking for new Fingal Corporate buildings.	Attach the following text to the action: 'When delivering this action, have due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage, when carrying out charging point infrastructure development.'
F3	To engage with the Fingal Coastal Liaison Group with the integration of adaptation strategies into planning policies, etc.	Attach the following text to the action: 'provided such strategies are unlikely to cause significant negative environmental effects.'

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LACAP Action Reference	LACAP Action	Mitigation Measure
F4	Develop and implement Coastal Protection Plan for Portrane	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 associated with coastal areas such as the receiving marine environment, biodiversity, European sites and recreation and amenity value.'
F5	Progress Flood Alleviation schemes in conjunction with the OPW - including Mill Stream Skerries, Bissett Strand and The Green Malahide Village, Portmarnock Bridge.	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 at these locations, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.'
F6	Continued engagement with the OPW to progress further studies of areas within Fingal at risk of flooding, and development of suitable schemes such as Strand Road Sutton and Santry	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 at these locations, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.'
F7	Progress appropriate minor works schemes to resolve recurring flood issues, where possible, ensuring the schemes are designed and implemented to promote SUDs / nature based solutions.	Attach the following text to the action: '/protection of biodiversity and European sites and avoidance of habitat fragmentation.'
F11	Restore St Ita's wetlands to maximise water attenuation capacity and nature conservation benefits	Attach the following text to the action: 'having due regard to the need to protect other environmental sensitivities. Ensure the works are designed and implemented in a manner that: 1. Does not result in the occurrence of significant adverse environmental effects and, 2. Promotes SuDS/nature based solutions/protection of biodiversity and avoidance of habitat fragmentation. 3. Ensures all excavated material defined as a waste is properly managed
F17	Ensure the inclusion of water conservation and SuDS measures in all developments, to reduce the level of surface water run-of, improve water quality and contribute to adaptation to climate change through natural based solutions.	in accordance with the provisions of the Waste Management Act.' Attach the following text to the action: 'Ensure all SuDS related construction works are designed and implemented in a manner that does not result in the occurrence of significant adverse environmental effects and does not result in adverse effects to European sites and biodiversity.'
F18	Drive the implementation of SuDS in FCC Capital projects, including new builds, retrofits etc, and monitor the level of implementation.	Attach the following text to the action: 'Ensure all SuDS related construction works are designed and implemented in a manner that does not result in the occurrence of significant adverse environmental effects and does not result in adverse effects to European sites and biodiversity.'
F23	Assess Resilience of Bridge Infrastructure vulnerable to impact of climate change	Attach the following text to the action: 'having appropriate regard to the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations.'



LACAP Action Reference	LACAP Action	Mitigation Measure
F26	Use the findings of the Fingal Cultural Heritage & Climate Risk Assessment to prioritise and pilot adaptative and palliative measures for heritage assets in Council ownership	Attach the following text to the action: 'having due regard to need to protect and enhance heritage assets, and prevent negative impacts on protected species, including bats.'
N1	Prepare and implement multi- functional management plans for the Rogerstown, Malahide and Baldoyle Estuaries and their surrounding lands	Attach the following text to the action: 'having due regard to environmental sensitivities at these locations, including water quality, biodiversity, European sites, wetland habitat, aquatic ecology, visual amenity and recreation and amenity value.
N4	Develop SUDS demonstration sites in the Tolka Valley, Ward River Valley, Balbriggan town Park and Rogerstown estuary	Attach the following text to the action: 'Ensure all SuDS related construction works are designed and implemented in a manner that does not result in the occurrence of significant adverse environmental effects.'
N13	Restore marine ecosystem along Fingal coast by supporting restoration projects of Oyster beds, Shellfish beds, Seagrass beds and Kelp stands	Attach the following text to the action: Restore marine ecosystem along Fingal coast by supporting restoration projects - designed, led and implemented by appropriately competent, trained ecologists - of Oyster beds, Shellfish beds, Seagrass beds and Kelp stands; having due regard to environmental sensitivities such as European sites and biodiversity.
N14	Prepare wetland and river restoration project for the Bog of the Ring and the Matt river corridor	Attach the following text to the action: 'having due regard to the need to protect other environmental sensitivities, and the need to ensure the works are designed and implemented in a manner that: 1. Does not result in the occurrence of significant adverse environmental effects and, 2. Promotes the protection and enhancement of biodiversity.'
R8	Assessment of Construction & Demolition Waste Management Plans for proposed developments to ensure all potential waste streams are identified at an early stage and appropriate measures put in place to promote prevention, reuse, recycling and recovery of waste in line with the waste hierarchy. The segregation and management of different waste streams is also assessed.	Attach the following text to the action: 'having due regard to environmental sensitivities such as European sites and biodiversity, and water and soil quality.'
R13	Prepare Circular Cities Action Plan	Attach the following text to the action: 'having due regard to need to ensure all waste collection and management activities are carried out in accordance with waste management legislation and in a manner that does not cause significant negative environmental effects or nuisance.'
R14	Implement measures under the Circular Cities Action Plan and Sustainable Fingal.	Attach the following text to the action: 'having due regard to need to ensure all waste collection and management activities are carried out in accordance with waste management legislation and in a manner that does not cause significant negative environmental effects or nuisance.'



LACAP Action Reference	LACAP Action	Mitigation Measure	
R18	Extending opening hours in Coolmine in line with Estuary Recycle Centre	Attach the following text to the action: 'whilst ensuring waste management activities at the facility continue to be carried out in accordance with the requirements of waste management legislation and in a manner that does not cause significant negative environmental effects or nuisance.'	
R19	Expand the bring bank network (bottles, cans & textiles) throughout Fingal by a minimum of 3 sites annually, giving consideration to new areas of populations and development.	Attach the following text to the action: 'whilst ensuring these sites are appropriately located, designed and managed so as not to cause significant adverse environmental effects.'	
R21	Assess Council lands & buildings for potential for renewable energy, biodiversity; green infrastructure, sustainable agriculture & other sustainable projects.	Attach the following text to the action: 'having appropriate regard to relevant planning and environmental protection criteria.'	
R22	Develop renewable energy, green infrastructure, biodiversity, sustainable agriculture & other sustainable projects on Council lands & buildings.	Attach the following text to the action: 'having due regard to all environmental sensititives that may be impact by significant development projects, including renewable energy projects, such landscape character and visual amenity, population and human health, biodiversity, European sites, noise, water and soil related sensitivities.'	
C10	Promote and support SEAI's Better Energy Communities and Sustainable Energy Communities	Attach the following text to the action: 'where specific supported energy efficiency and renewable energy projects will not lead to unintended negative environmental effects in a local community.'	
C12	Involve residents and community groups, e.g. Tidy Towns/community garden groups, in the establishment of newly planted trees in their area, e.g. watering	Attach the following text to the action: 'having due regard to environmental sensitivities such as European sites and biodiversity.'	



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

Promote climate action projects that support and maximise environmental co-benefits, such as biodiversity protection and enhancement; improved air, water or soil quality; or enhanced recreation, amenity and cultural heritage value, to ensure win-win benefits are gained.

Support or facilitate climate action related projects and initiatives which seek to make improvements in soil structure, management and health by increasing soil organic carbon - which will create the environmental co-benefits of improving flood resilience by enhancing water holding capacity of soils and increasing the level of GHG sequestration associated with land use functions.

Ensure all development underpinned or supported by climate action is planned and implemented in a manner that appropriately considers the potential for environmental co-benefits, potential environmental impacts and environmental protection requirements. No climate action related development project that is likely to have a significant negative effect on the receiving environment shall be supported.

Flood and coastal defence projects, or related maintenance works, shall be carried out in a manner that promotes climate action-biodiversity related co-benefits, and shall have due regard for the protection and enhancement of rare, protected or important habitats and species.

Ensure climate action related projects are carried out in a manner that promotes climate action-cultural heritage co-benefits, and do not result in unauthorised physical damage to cultural, archaeological or architectural features, or unauthorised or inappropriate alteration of the context of sensitive cultural heritage features.

Ensure climate action related projects are carried out in a manner that promotes climate action water quality co-benefits, and align with the provisions of the Water Framework Directive and relevant River Basin Management Plan.

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

The opportunities progressed, and any associated activities and development, such as energy, heating or active travel related development, shall have due regard to the need to protect sensitive aspects of the receiving environment, including local human receptors; European sites and biodiversity; heritage features, protected structures and the context in which such features sit; and the receiving water, soils and local air quality environment.

Any opportunities progressed that result in the development of renewable energy development, such as wind turbine development or solar panel development, shall specifically have due regard to the need to protect sensitive aspects of the environment from the typical effects of such development, including avifauna effects or landscape and visual related effects, including glint and glare.

Fingal County Council will advocate and exert influence to ensure that opportunities progressed that lead to the development of additional electricity network infrastructure, including linear cable infrastructure development, by electricity network operators, does not contravene relevant planning and environmental protection criteria or cause significant negative environmental effects.

Any opportunities progressed that support the upgrade of public lighting, shall have due regard to the need to ensure the lumen levels and spectral range of such lighting are maintained or reduced/controlled to avoid effects on biodiversity.

2.2.3 <u>Mitigation through consideration of development management standards/environmental protection</u> 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.

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2.3 Appropriate Assessment

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

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

2.4 Consultation on SEA Environmental Report

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

Various parties made consultation submissions and observations on the Draft LACAP and associated environmental reports. Detail on submissions received relevant to SEA and AA issues and documentation, responses to these submissions, and any changes made to SEA Environmental Report (ER) and NIR documents on foot of these submissions, is provided in Table 2-5. Updates were made to the SEA and AA documentation where relevant following on from receipt and consideration of the consultation submissions.

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Table 2-5: Responses to Consultation Submissions

Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
Naul Community Council	Dear LACAP Team, Environment, Climate Action and Active Travel Department,	The LACAP has been supported by a Natura Impact Report as well as an AA Screening report. The AA	None.	None.
	Naul Community Council welcomes the opportunity to engage with Fingal County Council's public consultation of the Draft Fingal Climate Action Plan 2024-2029.	Screening concluded that mitigation measures are required to avoid or minimise significant effects on European sites which were then detailed in the NIR. This consultation response appeared to have		
	While we broadly welcome the Draft Climate Action Plan 2024-2029, we would like to highlight a critical omission from the Draft Plan which we feel must be addressed in order for the plan to be consistent with both National Law and European Directives.	missed the conclusion.		
	It is essential that any potential impacts on all relevant nearby European Sites and indeed any relevant Candidate European Sites are included in the Appropriate Assessment Screening Process, so that the public are fully informed of any potential impacts when considering and/or preparing submissions on the Draft Climate Action Plan 2024-2029.			
	In this context, we feel it is important to rectify omissions at the earliest opportunity during the public consultation period. This may be addressed by publishing a revised Appropriate Assessment Screening Report and/or Errata document and consideration of extending the consultation period so that the public can fully consider the plan in its totality and any potential impacts which may arise from the Draft Plan.			
	Naul Community Council intend to submit a further detailed submission on the Draft Climate Action Plan 2024-2029. However, in lieu of our more comprehensive assessment of, and feedback on the Draft Plan, we feel it would be prudent to highlight a critical omission from the Appropriate Assessment Screening in respect of the Draft Fingal Local Area Climate Action Plan (LACAP) 2024-2029.			
	Omission of Candidate Special Protection Area (cSPA) from Appropriate Assessment Screening in respect of the Draft Climate Action Plan 2024-2029	The LACAP focuses on high level processes and actions which will be implemented subject to existing planning and environmental regulation	None.	Updated the NIS to include details of the North-West

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Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	In assessing the accompanying Natura Impact Report for the Fingal Local Area Climate Action Plan 2024-2029, Section 3 - Screening for Appropriate Assessment, prepared by Fehily Timoney and Company, completed on 15/09/2023, it is apparent that a site submitted to the European Commission in recent months has not been factored into the Appropriate Assessment Screening in respect of the Draft LACAP.	structures. The NIR identifies the actions which have potential to interact with ecological pathways and provides mitigation measures to this effect. Considering the details of the North-West Irish Sea cSPA (site code 004236) it was identified that the environmental envelope previously considered covers the ecological concepts required for the		Irish Sea cSPA (site code 004236).
	The site in question is the North-West Irish Sea cSPA (site code 004236 - https://www.npws.ie/protected-sites/spa/004236) which was formally announced on the 13th of July 2023 by the Department of Housing, Local Government and Heritage (DHGLH).	004236 protection of this site. Therefore, there were no additional ecological considerations required and		
	On the 13/07/2023, the Department of Housing, Local Government and Heritage announced the designation of a new candidate SPA with the accompanying press release:	final NIR for the plan. It has been clearly stated in the final NIR and		
	"Minister of State for Heritage and Electoral Reform, Malcolm Noonan TD, has announced details of Ireland's largest ever protected area for birds. The new North-West Irish Sea Special Protection Area (SPA) is to be designated under the EU Birds Directive and will cover more than 230,000 hectares of important marine waters for a range of bird species throughout the year. It increases the percentage of Ireland's marine waters which are protected under the EU Birds and Habitats Directives to over 9%.	subsequent determination that this site has been considered.		
	The new SPA adjoins twelve existing SPAs already designated along the coast in this area and the publication of detailed information and maps for the site brings certainty and clarity to a long mooted proposal for protections for marine birds in this area.			
	Speaking today, Minister Noonan said: 'I am delighted that we have been able to realise a long-held ambition to extend and significantly improve the protections in place for our marine birds. This site, at more than 230,000 hectares, is the largest SPA designation for birds in Ireland's history.	ntly at irds in t nore		
	We are working hard as a Government to ensure we have robust protections in place for nature as we work to deliver on our offshore renewable energy objectives. Biodiversity action and climate action must go hand in hand.'			

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E: SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	Director General of the National Parks and Wildlife Service, Niall Ó Donnchú, said: 'This is a milestone day for the protection of Ireland's marine biodiversity. The estuaries and bays that open into the North West Irish Sea, along with connecting coastal stretches of intertidal and shallow subtidal habitats, and the more pelagic waters further out to sea provide safe feeding and roosting habitats for a range of bird species including the seabirds that breed at colonies along our islands and coastal headlands. Ireland rightly has ambition and purpose to make a significant contribution to the targets set in the EU Biodiversity Strategy 2030. This new site is a determined step in that direction.'			
	The new North-west Irish Sea SPA extends offshore along the coasts of counties Louth, Meath and Dublin. More detailed information about the site, including a map, a species list and a list of the Activities Requiring Consent (ARCs) for the site is available on www.npws.ie/protectedsites.			
	The new site will be a Special Protection Area (SPA) under the EU Birds Directive, of special conservation interest for the following species: Common Scoter; Red-throated Diver; Great Northern Diver; Fulmar; Manx Shearwater; Shag; Cormorant; Little Gull; Kittiwake; Blackheaded Gull; Common Gull; Lesser Black-backed Gull, Herring Gull, Great Black-backed Gull, Little Tern, Roseate Tern, Common Tern, Arctic Tern, Puffin, Razorbill and Guillemot.			
	The new site adjoins twelve existing SPAs already designated for the protection of birds along the coast. These are: Lambay Island SPA; Skerries Island SPA; Ireland's Eye SPA; Howth Head SPA; Rockabill SPA; South Dublin Bay and River Tolka Estuary SPA; Boyne Estuary SPA; River Nanny Estuary and Shore SPA; Rogerstown Estuary SPA; Malahide Estuary SPA; Baldoyle Bay SPA and North Bull Island SPA."			
	See full press release here: https://www.gov.ie/en/press-release/bc137-minister-noonan-announces-irelands-largest-protectedarea-for-birds/.			
	Legal Provisions for Candidate Sites in the Natura 2000 Network		None.	None.

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PROJECT NAME: SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	According to the DHLGH: "SACs and SPAs are fully protected by law in Ireland from when the Minister gives notice of his intention to designate the sites. At present, all SACs are candidate SACs. Candidate and proposed sites are included as part of the Natura 2000 network. Indeed, potential SPAs enjoy protection from the time when they are identified as meriting consideration for designation."	This was in keeping with the details of the NIR report and methods undertaken.		
	The Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities, NPWS, also states:			
	"Article 6(3) requires that any plan or project that is not directly connected with or necessary to the management of the Natura 2000 site concerned but is likely to have a significant effect on it, on its own or in combination with other plans and projects, is to be authorised only if it will not adversely affect the integrity of that site. Screening for AA and, if screening indicates the need, AA itself, must be carried out and the assessment and conclusions recorded to ensure that existing and future plans or projects are not authorised if they are likely to adversely affect the integrity of a site. These safeguards are designed to ensure the conservation of Natura 2000 sites.			
	The requirements of the Habitats Directive in respect of plans and projects are similar in many respects to Environmental Impact Assessment (EIA) of projects, and Strategic Environmental Assessment (SEA) of plans and programmes. However, the focus of AA is targeted specifically on Natura 2000 sites and their conservation objectives. Article 6(3) and 6(4) of the Habitats Directive place strict legal obligations on Member States, with the outcomes of AA fundamentally affecting the decisions that may lawfully be made.			
	It is a basic responsibility of all agencies of the state, including planning authorities, to act diligently to ensure that their decisions in the exercise of their functions, as well as their actions, comply fully with the obligations of the Habitats Directive." (Source: https://www.npws.ie/protected-sites/guidanceappropriate-assessment-planning-authorities).			

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Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	According to the Office of the Planning Regulator (OPR) Practice Note PN01 - Appropriate Assessment Screening for Development Management, March 2021, Page 5:			
	The screening determination must be based on scientific information relevant to the likely effects on the conservation objectives of the relevant European sites. The information should be up-to-date and based on the best available techniques and methods to estimate the presence and extent of effects. This is because if there is any scientific uncertainty as to the absence of significant effects, the project must be screened in for appropriate assessment.	The screening determination was undertaken and concluded that there was a need for Stage 2 Appropriate Assessment. Therefore this was in keeping with the existing report.	None.	None.
	In the vast majority of cases the information provided by the applicant (including the project description) and publicly available information in relation to the European sites in question and information published by the NPWS, the EPA and others in relation to such sites, should provide a sufficient level of objective scientific information to allow the planning authority to make an informed decision on screening.			
	Page 6 of OPR Practice Note PN01 outlines: 'Regulation 42(1) requires that any public authority (including a local authority) must carry out a screening for appropriate assessment of a plan or project, for which an application for consent is received or which a public authority wishes to undertake or adopt.			
	As such, although screening may not be required under the 2000 Act, it may still be required under the European Communities (Birds and Natural Habitats) Regulations 2011, as amended, and careful consideration should be given to those regulations in carrying out all relevant functions.'			
	We express concern that the omission of a site within the Natura 2000 network from the AA Screening may result in the plan having likely significant effects on the recently designated site.	The screening determination was amended to include the additional site. The LACAP focuses on high level processes and actions which will be implemented subject to existing planning and environmental regulation structures. The NIR identifies the actions which have potential to interact with ecological pathways and provides mitigation measures to this effect. Considering the details of the North-West Irish Sea	None.	Updated the AA Screening and associated determination to include details of the North-West Irish Sea cSPA (site code 004236).

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Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
		cSPA (site code 004236) it was identified that the environmental envelope previously considered covers the ecological concepts required for the protection of this site. Therefore, there were no additional ecological considerations required and the North-West Irish Sea cSPA (site code 004236) was added to the material considered within the final NIR for the plan. It has been clearly stated in the final NIR and subsequent determination that this site has been considered.		
	As such, The Draft Climate Action Plan 2024-2029 appears to be inconsistent with the requirements of S.I. 435 of 2004: European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004, as amended by S.I. 200 of 2011: European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011, and in contrary to the requirements of Article 6 of the Habitats Directive 92/43/EEC and Regulation 42(1) of the European Communities (Birds and Natural Habitats) Regulations 2011-2015.	It has been clearly stated in the final NIR and subsequent determination that this site has been considered.	None.	Updated the AA Screening, associated determination and NIR to include details of the North-West Irish SeacSPA (site code 004236).
	In addition, any potential effects on the North-West Irish Sea cSPA have not been screened or are not available/accompanying the Draft Plan for public consideration/scrutiny. In this regard, care should be taken to ensure compliance with the Aarhus Convention.	The Aarhus Convention is an international agreement that gives people the right to access information about the environment. It also promotes public participation in decision-making and provides access to justice on environmental matters. The environmental envelope being considered is	None.	None.
		clearly stated and available to the public. The implications for the North-West Irish Sea cSPA are addressed by the existing mitigation measures presented. It is procedure to amend all plans, programmes and		
		strategies after public consultation and update environmental reports as appropriate. There is no precedent to re-engage with the public after this process. The final assessments will be made		

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Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
		publicly available (as per the Aarhus Convention) upon adoption of the LACAP.		
	Comparative Analysis of other Local Authority Plan Appropriate Assessment Screening	Noted.	None.	None.
	Naul Community Council would like to reference other plans carried out by the Local Authority in recent months which have sufficiently screened all relevant sites within the Natura 2000 Network.			
	Some weeks ago, the Draft Fingal Heritage Plan was open for public consultation from Wednesday 23 August to Wednesday 04 October 2023.			
	The Appropriate Assessment Screening undertaken in respect of the Draft Heritage Plan 2024-2030 by Brady Shipman Martin, dated 08/08/2023, references the North-West Irish Sea cSPA on page 27 of the AA Screening Report (see: https://consult.fingal.ie/en/consultation/draft-fingal-heritage-plan-2024-2030). As such, the plan had been adequately screened.			
	The Draft Heritage Plan 2024-2030 factored in the Candidate SPA, despite the fact that the intent to designate (12/07/2023) by the Minister was made less than a month prior to the Appropriate Assessment Screening report being completed 08/08/2023.			
	When comparing the Draft Heritage Plan 2024-2030 to the Draft Climate Action Plan 2024-2029, which had an Appropriate Assessment Screening Report prepared on 15/09/2023 (over two months after the Minister signalled his intent to designate the site), it is rather concerning that AA Screening in respect of the Draft Climate Action Plan 2024-2029 did not factor in all sites within the Natura 2000 Network, despite there being a greater period of time to do so, when compared to the period afforded to the Draft Heritage Plan AA Screening from the point the Minister notified of his intention to designate.			
	Naul Community Council commend the fact that the Draft Heritage Plan 2024-2030 was sufficiently screened within a limited timeframe from the point the intent to designate the site was made by the Minister, However, we express concern as to why the LACAP could not achieve sufficient AA screening within a greater time period (2 months from the Ministers declaration to designate the site).			

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Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	In this context, we cannot understand why there was any reason for the cSPA to be omitted from the AA Screening in respect of the Draft Climate Action Plan 2024-2029.	The information presented is in keeping with the No		
	If the Heritage Office, with limited resources/personnel can ensure the delivery of a sufficiently screened Draft Plan for public consultation within a limited timeframe, then there would appear to be no reason as to why the Environment, Climate Action and Active Travel Department, with greater resources/personnel and time, could not also deliver a sufficiently screened Draft Plan for consultation.			
	Naul Community Council express some concern, as the aforementioned omissions/timelines may indicate potential issues with the impetus behind the delivery of the final LACAP 2024-2029 over the plan period. It is imperative that the ambition of the LACAP 2024-2029 is not compromised and that the plan's, objectives and goals are delivered in a timely fashion.			
	Prioritisation of Projects under the Draft LACAP		None.	The AA was updated
	Given the omission of North-West Irish Sea cSPA for the draft LACAP 2024-2029 (see map below), issues arise as to how Actions have been identified for prioritisation within the Draft LACAP Plan.	environmental considerations within the existing NIS. There are no sources for effects or ecological receptors identified in this submission and the associated online material. Therefore, the concerns		accordingly and all such information is publicly available.
	For example, projects which have a direct connectivity to/relationship with or likely influence on Natura 2000 sites, such as the new North-West Irish Sea cSPA or other European Sites may need to be prioritised owing to obligations under EU Habitats and the Water Framework Directive.	were noted and have been clarified in the text of the AA Screening and NIS as well as the associated		
	As the cSPA has been omitted from the Draft LACAP and its Screening it raises the question as to whether the prioritisation of Actions within the LACAP has been done so in line with overarching European Obligations, such as those under the Water Framework Directive and emerging National Policy under the Draft Third Cycle River Basin Management Plan.			
	An example of a project, which given the recent cSPA designation and recommendations within the Draft River Basin Management Plan, which may now need to be prioritised, is a new project which has			

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Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	become a Local GIM Objective adopted in the Fingal Development Plan this year:			
	GIM31 - Prepare and implement wetland and river restoration project for Delvin River within the lifetime of this Development Plan in conjunction with local landowners and stakeholders. {As part of this project, consideration shall be given to address pollution of the Delvin River at Naul.}			
	(Source: Page 242 of Fingal Development Plan 2023-2029 Appendices, https://www.fingal.ie/development-plan-2023-2029).			
	(See reference to Delvin River under Draft River Basin Management Plan 2021-2027 Areas for Action here: https://www.gov.ie/pdf/?file=https://assets.gov.ie/199138/ed726b60-2e23-4e7b-aa08-dc1fa9ef3663.pdf#page=null).			
	Given the relationship between this objective and the recently designated Natura 2000 site downstream, there is a greater onus on the LA to deliver this plan to achieve a more favourable WFD status of the river which discharges to a European Site, not least due to the fact the local objective is stated to be delivered 'within the lifetime of this development plan'.			
	Naul Community Council requests that this objective is included in the Draft LACAP, as at present there is only one other Action proposed west of the M1 motorway in rural Fingal and there is a need to ensure equity and even distribution of actions within the LACAP across the geographical area of the county.			
	A Holistic Approach Across the Council	Noted.	None.	None.
	Considering Ireland Declared Climate and Biodiversity Crises in 2019 and considering the Recommendations of the Citizens Assembly on Biodiversity, it crucially important that Fingal County Council takes leadership in tackling the immense challenges facing society.			
	Communities across the county were extremely vocal on issues last year regarding the lack of funding available to support and implement the Draft Fingal Biodiversity Action Plan, both online via the public consultation on the Draft Action Plan and other media platforms.			

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Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	Public outcry/advocacy lamented the need for the executive to commit to resources and fund all 100 actions in the plan and a commitment was made to implementing the plan in full last year.			
	It is evident that there is a need for all Departments to collaborate and work together in order to achieve the actions within the LACAP 2024-2029 in a holistic approach. In this regard it is important that Heritage and Biodiversity Offices within the Council are sufficiently resourced so that all facets of the Draft LACAP can be achieved and that the ambition of the plan is not constrained by resourcing issues.			
	AA Screening Revision Required	Noted.	None.	The AA was updated
	Given that a recent Natura 2000 Network site was designated, which now encompasses over 55% of Fingal's coastline, there is a need for the AA Screening to be revised so that plan is fully screened against impacts/effects on sites within the Natura 2000 Network.			accordingly and all such information is publicly available.
	At present, it is unreasonable for the public to consider the plan which only screens sites encompassing less than half of the designated area of the county. The public must be equipped with all relevant information in order to make informed submissions on the Draft LACAP, given the societal challenges we face in a changing climate.			
	In this regard, it would be helpful if maps of designated sites were also included in the screening reports, as at present these are omitted.			
	Kind regards,			
	lan Lennon			
	Chairperson, Naul Community Council			
Sustainable Skerries	It seems that there has been an oversight in omitting the North-West Irish cSPA (site code 004236 North-west Irish Sea SPA National Parks & Wildlife Service (npws.ie)) from the Appropriate Assessment Screening, this needs to be addressed - see the submission by Naul Community Council Concern Draft Climate Action Plan is inconsistent with the Habitats Directive Fingal County Council Online Consultation Portal.	Noted and agreed. Appropriate action was taken as per our response to Naul Community Council's submission.	None.	None.

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CLIENT:

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PROJECT NAME: SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
Biodiverse Balbriggan	We support Naul Community Council's request for inclusion of the North-West Irish cSPA (site code 004236) in the Appropriate Assessment screening as part of the Public Consultation, please include the Climate Change, Environment and Water Linkage Group of the Fingal PPN.	Noted and agreed. Appropriate action will be taken as per our response to Naul Community Council's submission.	None.	None.
Rush Tidy Towns	The oversight in omitting the North-West Irish cSPA (site code 004236 North-west Irish Sea SPA National Parks & Wildlife Service (npws.ie)) from the Appropriate Assessment Screening, needs to be addressed see the submission by Naul Community Council Concern Draft Climate Action Plan is inconsistent with the Habitats Directive Fingal County Council Online Consultation Portal.	• '' '	None.	None.
Sea Fisheries coordination DAFM	Ireland's seafood industry (fishing and aquaculture) is one of the key stakeholders operating in the marine area and plays a vital role in the sustainability of our coastal communities. Over 15,000 people are employed around our coast both directly and indirectly. Many of these communities have very limited alternative employment and economic activity options. It is therefore essential that the socio-economic reliance on the seafood sector is fully recognised and is factored into any Climate Change Action plan. Fishing and food security is as key a part of Government Policy. Food Vision 2030 recognises and values the role of primary food producers.		None.	None.
	The Seafood industry is experiencing a period of difficult change, arising from the ongoing consequences of the EU UK Trade and Cooperation agreement which are specific and impactful on Ireland's seafood sector. There is now ever-increasing demand on the marine space from Offshore Renewable Energy (ORE), Marine Spatial Planning, Marine Protected Areas (MPAs), and other environmental measures.	Noted.	None.	None.
	Our coastal communities and maritime sectors will continue to play a significant role in contributing to our climate goals and will continue to be consulted and supported in the transition to carbon neutrality. The seafood industry, through both the Sectoral Adaptation Plan (Agriculture, Forest and Seafood Climate Change Sectoral Adaptation Plan) and the annual Climate Action Plan (CAP23) continue to support initiatives to improve understanding of our marine area and ensure sustainable resource use, including through bio and circular		None.	None.

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Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	economy initiatives. These plans require consideration in the SEA process.			
	to develop a roadmap for the energy transition of the sector towards climate neutrality by 2050. The roadmap will set out investment needs, sector initiatives and inform policy decisions to help achieve this transition. The ETP is a multi-stakeholder platform intended to promote co-operation, knowledge sharing and dialogue between private and public stakeholders in order to accelerate the energy transition in the fisheries and aquaculture sector. This Partnership will help to shape the development of future transitional actions for	Plan are however mutually symbiotic and harmonious with the vision and measures defined in European Commission's Communication on the energy transition of the fisheries and aquaculture sector. Insofar as the local authority's remit extends, the plan supports the protection and enhancement of the marine environment. The climate action defined in the plan has the potential to generate multiple climate action benefits, and co-benefits for the water and biodiversity	Communication on the energy transition of the fisheries and aquaculture sector in Section 3.4 – Incombination effects with Other Plans and Programmes, and Appendix 2 – Relationship with other Plans and Programmes, as appropriate.	Reference was made to the European Commission's Communication on the energy transition of the fisheries and aquaculture sector in Section 7.3 – Potential Cumulative Effe of the LACAP in combination with other Plans and Projects, and Appendix 1 – Relationship of the Plan with other relevant Plans and Programmes, as appropriate.
Cian O'Mahony SEA Section Office of Radiation Protection and Environmental Monitoring Environmental Protection Agency	The SEA should also assist in identifying ways to maximise the potential co-benefits of climate-related measures for air quality, human health, biodiversity, water quality and other interrelated areas (i.e. win-win solutions).	Noted and agreed. It was noted that the SEA Environmental Report (ER) has defined Environmental Governance Principles and action amendment suggestions to ensure climate action co-benefit opportunities are maximized. Various defined mitigation measures serve to promote winwin 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.		None	None
	Environmental Authorities Under the SEA Regulations, you should consult with: Environmental Protection Agency;	Noted. All listed Environmental Authorities have been consulted with as part of the SEA process.	None	None
I	Minister for Housing, Local Government and Heritage;			

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Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	 Minister for Environment, Climate and Communications; Minister for Agriculture, Food and the Marine. 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. 	It was recommended the Council confirm receipt of this submission with Cian O' Mahony, if this was not done already.		
	Non-Technical Summary You should ensure that the Non-Technical Summary includes the relevant information as required under Schedule 2 of S.I No. 434 Of 2004, as amended.	It was assumed that SI No. 434 was a typo and SI No. 435 is what was intended to be addressed with this statement. The requirements of Schedule 2 of SI No 435 have been noted and amendments to the NTS were made as appropriate.	None.	Updated the NTS to reflect the relevant information as required under Schedule 2 of SI No 435 of 2004 as amended.
	Relationship with other plans and programmes We acknowledge that the Plan has been prepared taking account of the key National plans including the National Climate Action Plan 2023. We also acknowledge that the Plan sets out the key plans, programmes and policies considered in preparing the SEA. The Plan should include a commitment to remain aligned with high level plans and programmes, Guidelines, and legislation over its lifetime. The Climate Action Plan 2024 is currently being prepared and work will be commencing on the review of the National Planning Framework and Regional Spatial and Economic Strategies also. Any relevant updates of these plans/strategies should be integrated as appropriate into the Plan as relevant and appropriate. The Plan should include a commitment to consider any relevant updated actions, measures or recommendations that may arise in updates to the National Climate Action Plan (or the National Planning Framework) over the lifetime of the Plan.	Noted and agreed. It was noted that this is in reference to the LACAP and not the SEA ER or AA NIR documentation. 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. It was recommended the plan include a commitment in the Plan to consider and appropriately integrate relevant updates to the national Climate Action Plan and National Planning Framework over the lifetime of the Plan.	None.	None.
	Strategic Environmental Objectives 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.	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

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PROJECT NAME:

SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	Alternatives We note the alternatives considered in the SEA and acknowledge the preferred option selected.	Noted.	None.	None.
	Mitigation Measures Where the potential for likely significant effects has been identified, you should provide appropriate mitigation measures to avoid or minimise these. You should also ensure that the Plan includes clear commitments to implement the relevant mitigation measures.	The SEA produced recommended a suite of mitigation measures in response to climate actions considered to have potentially significant environmental effects. 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. Mitigation has also been achieved by the integration of environmental considerations into the defined LACAP climate actions. These mitigation measures have been wholly integrated into the LACAPs. Section 8 of the SEA ER provides full detail of these environmental mitigation measures. It was recommended the Plan provides a clear commitment to implement these mitigation measures, if this was not done already.	None.	None.
	Monitoring, Implementation & Reporting The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities If the monitoring identifies adverse impacts during the implementation of the Plan, then you should ensure that suitable and effective remedial action is taken.	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). The monitoring programme is multi-facetted, broad in scope and has been designed to allow for a flexible and adaptive approach to SEA monitoring during Plan implementation.		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. Provided additional detail on monitoring programme data sources.

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CLIENT:

Fingal County Council

PROJECT NAME: SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



onsultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	Guidance on SEA-related monitoring is available on the EPA website at	The monitoring programme has been designed to		
	06695-EPA-SEA-Statements-and-Monitoring-Report.pdf	inherently measure cumulative effects that may		
		arise due to the implementation of the Plan.		
		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 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.'		
		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.		
		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.		
		A commitment to remedial action in the event SEA		
		monitoring shows the implementation of the Plan		

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onsultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
		is having adverse environmental effects has been made in the SEA.		
	EPA State of the Environment Report Our State of Environment Report, Ireland's Environment - An Integrated Assessment 2020 (SOER2020) identifies thirteen 'Key Messages for Ireland'. Delivering Ireland's long-term sustainable development and environmental objectives will involve many different stakeholders to address these key actions. The report recognises the need for full implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies.	Noted. 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.	None.	None.
	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.			
	SEA Statement – "Information on the Decision" Once the Plan is adopted, you should prepare an SEA Statement that summarises:	Noted. An SEA statement was produced and circulated to any environmental authority consulted during the SEA process.	None.	None.
	 How environmental considerations have been integrated into the Plan; 	the		
	 How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan; 			
	 The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and, 			
	 The measures decided upon to monitor the significant environmental effects of implementation of the Plan. 			
	You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.			
	Future Amendments to the Plan	Noted.	None.	None.

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CLIENT:

Fingal County Council

PROJECT NAME:

SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



Consultee	Submission Text	Detailed response	Changes to ER	Changes to NIR
	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			

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2.5 SEA and Plan Modifications

FCC 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 2-6. No modifications affecting the SEA and AA processes were made upon Plan Adoption.

Table 2-6: Plan Action Modifications

Action	Summary of Modification
E8	This action has been reworded to include the sentence "and extend the assessments under the various indicators from BREEAM and the Build Upon Energy Renovation Framework to Public Buildings" as follows:
	Engage with independent BREEAM assessor and utilise Building Assessment Methodology throughout delivery of Swords Cultural Quarter flagship project; and extend the assessments under the various indicators from BREEAM and the Build Upon Energy Renovation Framework to Public Buildings. BREEAM is a leading validation and certification system for sustainable built environment.
E17	This action has been amended to include "where feasible" and "(subject to programmes and funding support)" as follows:
	Continue to make energy efficiency retrofits to social housing under the DHLGH-supported Energy Retrofit Programme. Ensure FCC's social housing stock has a B2 or cost optimal energy rating where feasible by 2030 (subject to programmes and funding support).
N16	This action has been reworded to include "and community gardens" as follows:
	Continue supporting the use of public allotments and community gardens as a way communities can grow their own food, and lower food miles and food waste.
E30	This action has been reworded as follows:
	Work with SMEs to promote energy efficient adaptations through Local Enterprise Office initiatives including Green for Business and the Energy Efficiency Grant.



Action	Summary of Modification
E31	This action has been reworded as follows:
	Conduct research into the Council's historic building stock that consider pre and post-works energy performance and devise advice on appropriate and sensitive retrofitting/energy upgrading of traditional buildings to inform works to other Council-owned properties and to Guide private owners.
R14	This action has been reworded to include the words "and Sustainable Fingal" as follows: Implement measures under the Circular Cities Action Plan and Sustainable Fingal.
R15	The following new action has been added to the Circular Economy and Resource Management Section of the Plan:
	Broaden the scope of the Sustainable Fingal initiative to include businesses, communities and organisations, explore the concept of the circular economy, and lead on a Just Transition to Net Zero and a climate-resilient economy.
C19	The following new action was included within the Plan:
	Publish in annual progress reports of the LACAP, any publicly available figures relating to Dublin Airport emissions, and invite the daa to provide progress updates and plans to meet the national carbon neutrality objective.
	Additional narrative in relation to the above was added to the Plan in relation to the above also (describing the background to the action).

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:

- 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.

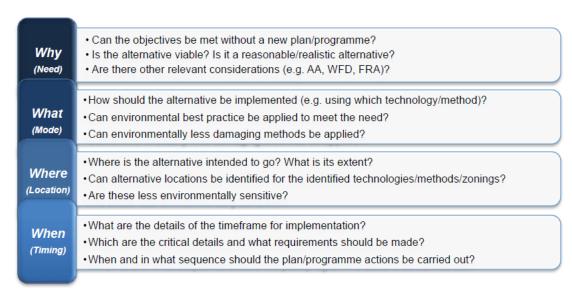


Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3

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.

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Table 3-1: Reasonable Alternatives to the LACAP

Reasonable Alternative	Description of Reasonable Alternative	Reasoning for selecting this Reasonable Alternative
Alternative 1 - The Pareto Approach: Prioritize reducing GHG emissions from largest GHG emitting sectors to mitigate against climate change impacts.	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.	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).
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.	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.	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).
Alternative 3 - The Holistic and Participatory Approach (Current LACAP): Adopt a multipronged 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.	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.	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).

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

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

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

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

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

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



4. SEA CONCLUSION

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

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

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



5. SEA MONITORING

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

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

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

FCC are responsible for implementation of the SEA monitoring programme. The environmental effects (including positive, negative and cumulative effects) of LACAP implementation will be monitored once every year over the course of the plan's five-year lifetime. This monitoring will be carried out by the Environment section of Fingal 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.

Fingal County Council

E: SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



Table 5-1: SEA Monitoring Programme

Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
Overall	01	Ensure, where appropriate, that lower-level plans and projects contribute to overall environmental monitoring processes within the County.	Lower-level plan and project accordance with the plan.	Require all lower-level plans and projects have appropriate regard to and appropriately support all action and development proposals defined in the Plan. Ensure alignment between the Plan and the County Development Plan.	Review of Local Area Plans. Internal monitoring of likely significant environmental effects of development projects. Review of lower-level plan SEA documentation
Population & Human Health	PHH1	Avoid or, minimise impacts to population and human health.	Number of spatial concentrations of health problems arising from environmental factors as a result of implementing the Plan.	No spatial concentrations of health problems arising from environmental factors as a result of implementing the Plan.	Consultation with the Health Service Executive (HSE)/Health Atlas Ireland and the EPA.
	PHH2	Ensure the Decarbonising Zone avoids and minimises impacts to the existing economic activities within the area and does not compromise/conflict with existing land use objectives.	Compliance of action and development supported by the plan with policies and land use objectives protective/supportive of economic development in the county defined in the County Development Plan (CDP) or County Local Area Plans.	No contravention of policies and land use objectives protective/supportive of economic development in the county defined in the CDP or County Local Area Plans. Consent for development proposals supported by the plan only to be granted where development complies with policies protective/supportive of economic development.	Internal monitoring of compliance with CDP Policy Objectives. Internal monitoring of likely significant environmental effects of development projects.
Biodiversity, Flora & Fauna	B1	Ensure Climate Action does not conflict with biodiversity protection, restoration and rehabilitation.	Compliance of action and development supported by the plan with policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the CDP. Condition of habitats impacted by climate change (Area km² /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 there is no reduction in the number of geographic distribution of species as a result of climate change effects.	Internal monitoring of compliance with CDP Policy Objectives. Internal monitoring of compliance with the County Biodiversity Action Plan. Internal monitoring of likely significant environmental effects of development projects.

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PROJECT NAME:

SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



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

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



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	B3	Support Article 10 of the Habitats Directive with regard to the management of features of the landscape which - by virtue of their linear and continuous structure or their function as 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 (km²). 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. Status of listed species in the Wildlife Acts 1976 - 2012.	No adverse impacts on condition of semi-natural habitats, species, environmental features or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed for designation, as a result of plan implementation. No adverse impacts on listed species in the Wildlife Acts 1976 - 2012 as a result of plan implementation.	Internal monitoring of likely significant environmental effects of development projects. Mapping of LR important habitats and species as part of the County Biodiversity Plan.
	B5	No net contribution to biodiversity losses or deterioration in response to the biodiversity emergency.	Compliance of development supported by the plan with policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the CDP.	No 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 compliance with the County Biodiversity Action Plan. Internal monitoring of likely significant environmental effects of development projects.

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Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
			No. of developments consented that have significant greenspace proposals. Improved biodiversity areas (Area km² /length metres). Compliance of development supported by the plan with policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the County's Biodiversity Action Plan.	Increase quantum of improved biodiversity areas. No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the County's Biodiversity Action Plan. Consent for development proposals supported by the plan only to be granted where development complies with policy supportive of biodiversity protection and enhancement.	Mapping of LR important habitats and species as part of the County Biodiversity Plan.
Landscape, Seascape & Visual Amenity	L1	Avoid or, minimise impacts to statutory landscape designations defined in the CDP.	Status of Landscape Character Areas, the Seascape, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects. Number of developments consented that result in avoidable adverse impacts on Landscape Character Areas, the Seascape, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects. Number of areas in the local authority functional area designated for their landscape character or visual amenity.	All action and development proposals supported by the plan must comply with policy objectives relating to the protection of Landscape Character Areas, the Seascape, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects defined in the CDP. No development supported by the plan should have an adverse impact on Landscape Character Areas, the Seascape, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects.	Internal monitoring of compliance with CDP Policy Objectives. Internal monitoring of likely significant environmental effects of development projects. Review of future iterations of the Landscape Character Assessment.
	L2	Avoid or minimise adverse visual effects on residential receptors or other sensitive visual receptors.	Number of developments consented that result in avoidable adverse visual impacts on residential receptors or other sensitive visual receptors.	No development supported by the plan should have a significant adverse visual impact on residential receptors or other sensitive visual receptors.	Internal monitoring of likely significant environmental effects of development projects. Review of future iterations of the Landscape Character Assessment.

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SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



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)).	Percentage of features contained in the RMP (and, where relevant, the associated surrounding context) protected from adverse effects due to action and development occurring as a result of this plan. Percentage of features contained in the RPS and NIAH (and, where relevant, the associated surrounding context) protected from adverse effects due to action and development occurring as a result of this plan.	No features contained in the RMP (nor the associated surrounding context) should be significantly adversely affected as a result of the implementation of this plan. No features contained in the RPS and NIAH (nor the associated surrounding context) should be significantly adversely affected as a result of the implementation of this plan.	Internal monitoring of likely significant environmental effects of development projects. Consultation with the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media. Review of Heritage Plan environmental effect monitoring.
Soils	S1	Avoid or minimise effects on mineral resources or soils.	Number of instances of significant adverse impacts on mineral resources or soils occurring, including the pollution, loss or degradation of mineral resources or soils, as a result of action and development supported by the plan.	No instances of significant adverse impacts on mineral resources or soils occurring as a result of action and development supported by the plan.	Internal monitoring of likely significant environmental effects of development projects. Consultation with Geological Survey of Ireland and review of published data on the soils environment.
Land Use	LU1	Avoid or minimise effects on existing land use.	Number of instances of significant adverse impacts on existing land use as a result of plan implementation.	No instances of significant adverse impacts on existing land use as a result of plan implementation.	Internal monitoring of likely significant environmental effects of development projects. Review of Land Use, Land Use Change and Forestry related Greenhouse Gas emissions calculated in the Baseline Emission Inventory.

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PROJECT NAME: SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



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 nonmechanical 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. Avoid or minimise adverse noise impacts.	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. Number of sensitive receptors exposed to noise nuisance.	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. No sensitive receptors exposed to nuisance noise 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. 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, transitional, bathing, and coastal 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. Status of transitional and coastal water bodies as reported by the EPA Water Monitoring Programme for the Water Framework Directive (WFD).	Number of Pollution Incidents detected due to poor bathing water quality results. Not to cause deterioration in the status of any water or affect the ability of any 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.

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

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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 upon existing and (where known) planned infrastructure	Number of incompatible developments (supported by the plan) adversely affecting existing or planned infrastructure, including water supply, wastewater management, energy and transport infrastructure.	No incompatible development (supported by the plan) adversely affecting existing or planned material assets infrastructure.	Internal monitoring of likely significant environmental effects of development projects, including monitoring of effects on other future planned or committed material asset infrastructure projects. Consultation with Irish Water, Gas Networks Ireland, ESB Networks and Transport Infrastructure Ireland.
	MAI3	Promote sustainable transportation.	% change in modal split. Kilometres of permanent segregated cycling network. Kilometres of permanent integrated cycling network. Number of Electric Vehicle charging points in the county. Total Area of road reallocated for sustainable alternatives (m²).	Percentage increase in the number of public transport users in the County Increase kilometres of permanent segregated cycling network. Increase kilometres of permanent segregated cycling network. Increase number of Electric Vehicle charging points in the county. Increase Total Area of road reallocated for sustainable alternatives.	CSO Population data - Commuting in Ireland. Internal monitoring of length of new sustainable transport routes developed.
	MAI4	Promote sustainable waste management.	Tonnes of hazardous waste received at Council Waste Management Facilities annually. Tonnes of W.E.E.E. waste received at Council Waste Management Facilities annually.	Increase waste recycling in the County. Reduce waste generation in the County.	EPA Waste Statistics. Consultation with the EPA.

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

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CLIENT:

Fingal County Council

PROJECT NAME:

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

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