



CONSULTANTS IN ENGINEERING,  
ENVIRONMENTAL SCIENCE &  
PLANNING

# LOCAL AUTHORITY CLIMATE ACTION PLAN

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## Strategic Environmental Assessment Statement

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**Prepared for:**  
Louth County Council



Comhairle Contae Lú  
Louth County Council

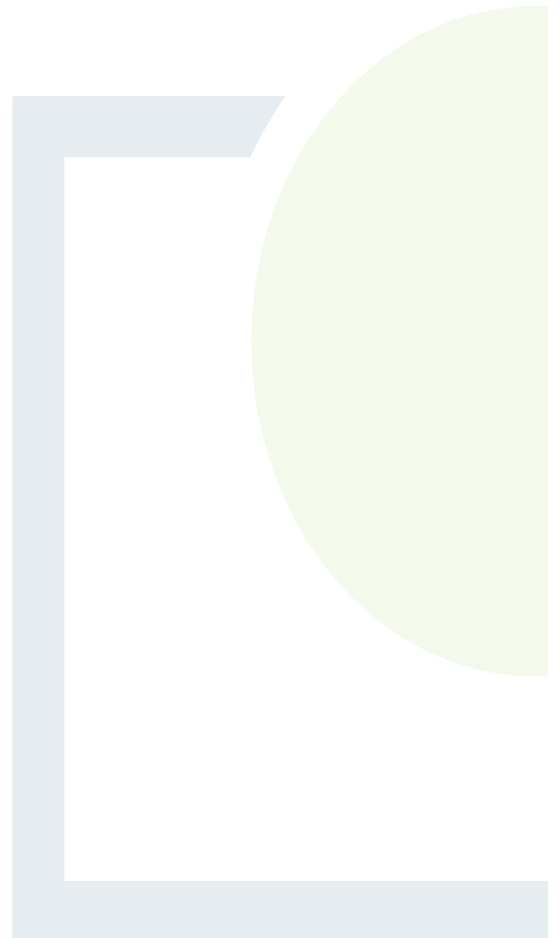
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## Strategic Environmental Assessment Statement

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

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

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

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

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

### 1.2 Legislative Context

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

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

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

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

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



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



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

### 2.1 SEA Scoping

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

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

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

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



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

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



Environmental Authority	Summary on the Scoping Consultation Submission	How was this submission taken into account during the SEA?
	<ol style="list-style-type: none"> <li>1. Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general.</li> <li>2. Geohazards should be considered during the Plan-making and development processes.</li> <li>3. Sustainable development of our natural resources should be an integral part of all development plans from a national to regional to local level to ensure that the materials required for our society are available when required.</li> </ol>	
DAFM Seafood	<p>DAFM note that Commercial sea fishing is a long standing, pre-existing and traditional activity in the marine environment. They note that the Seafood Industry is experiencing a period of difficult change and that there is an ever-increasing demand on the marine space from offshore renewable energy, marine spatial planning, marine protected areas, and other environmental issues. Coastal communities continue to play a significant role in contributing to climate goals through the Sectoral Adaptation Plan and the Climate Action Plan, both of which should be considered during the SEA process. Also for consideration in the SEA process is the European Commission’s Communication on the energy transition of the fisheries and aquaculture sector as part of its Fisheries Policy Package. They implore Local Authorities to include relevant steps to support Just Transition for sea fisheries and aquaculture in their climate action plans.</p>	<p>The content of this submission served to inform the focus of the environmental assessment of any marine-related action defined in the LACAP. It informed the nature and focus of mitigation measures defined for any action that may result in impacts on sea fisheries and the marine in the LACAP.</p>



## 2.2 Environmental Assessment and Mitigation

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

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

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

### 2.2.1 Mitigation through consideration of alternatives

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

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

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

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

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

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



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

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

LACAP Action Reference	LACAP Action	Mitigation Measure
1.13	Increase participation in SEAI Pathfinder programme for public sector	Attach the following text to the action: whilst promoting - through control or influence, as appropriate - project adherence to planning and environmental protection criteria.
2.1	Demonstrate Leadership in the National Retrofitting Scheme for private homes across the county. By retrofitting our council housing stock, promoting best practice examples from within the county and providing information of accessing funding supports to interested members of the public.	Attach the following text to the action: Promote the need to adhere to environmental protection requirements during retrofit projects, including the need to appropriately conserve built heritage.
2.2	<ul style="list-style-type: none"> <li>Compile a register of vacant properties, derelict sites and brownfield sites within Louth's main urban areas and use the current legislative process to facilitate their regeneration and return to full use. This will provide synergies with the urban regeneration works of the council</li> </ul>	Attach the following text to the action: Have due regard to the need to appropriately protect and conserve biodiversity and natural and built heritage.
2.3	Fully Deliver the National Sustainable Mobility Policy's Pathfinder projects for Dundalk and Drogheda.	Attach the following text to the action: having due regard to heritage protection requirements.
2.4	Deliver additional active travel projects within the county to further develop walking and cycling as an alternative to private car use.	Attach the following text to the action: Ensure supported active travel development is carried out in a manner that has due regard to environmental sensitivities such as biodiversity, European sites, water quality and hydrology.
2.5	Develop a fleet usage policy for Louth County Council. This policy is to allow for decarbonisation of the LCC fleet by examining options around vehicle usage, fuel types, ownership or hire options, service continuity, centralised procurement Decarbonise the Louth County Council fleet to the maximum allowable level, while maintaining service delivery by enacting the recommendations from the fleet usage policy	Reword to the following: Develop a fleet usage policy for Louth County Council. This policy is to allow for decarbonisation of the LCC fleet by examining options around vehicle usage, fuel types, ownership or hire options, service continuity, centralised procurement. Sustainably decarbonise the Louth County Council fleet to the maximum allowable level, while maintaining service delivery by enacting the recommendations from the fleet usage policy.
2.8	Build on Louth's leading position by decarbonising the public Lighting in County Louth by completing the National Public Lighting Energy Efficiency Project.	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.



LACAP Action Reference	LACAP Action	Mitigation Measure
2.9	Development of EV charging infrastructure plan for Louth	Attach the following text to the action: Ensure such development promotes climate action co-benefits and does not contravene relevant environmental protection criteria or cause significant negative environmental effects.
2.14	Implement cycling strategies in Louth	Attach the following text to the action: Ensure the cycling strategies have due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites and cultural heritage.
2.15	Develop walking strategy for Louth	Attach the following text to the action: Ensure the walking strategy is developed in a manner that has due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites and cultural heritage.
3.2	Develop a new Local Biodiversity Action Plan for County Louth in line with the new national Biodiversity plan in accordance to the guidelines set out by the Heritage Council.	Attach the following text to the action: This plan shall have a focus on use/promotion of native species.
3.6	Develop and implement a Nature-Based Solutions (NBS) and integrated rainwater management protocol for both Council and private sector projects. A protocol for NBS will address the following: I. Part 8 and Section 177AE applications for active travel, roads, public realm projects, public housing, footpath upgrades, public and council carparks, greenway/Blueway planning etc. with targets for all. ii. 'Taking in Charge' – put in a plan and resource taking in charge schemes.. iii. Plan and resource maintenance iv. Build in education and awareness for public and elected members. v. Application of water sensitive urban design concepts vi. Inland Fisheries Ireland guidance for watercourses to be considered as part of relevant council policy.	Attach the following text to the action: vii. Environmental protection requirements relating to projects involving the development of NBS.
3.8	Update Fire management plan for Cooley Mountains	Attach the following text to the action: Ecological expertise shall be sought during plan updating. The plan shall have due regard to the need to appropriately protect important habitats.
3.9	Develop a Coastal protection plan for Louth	Attach the following text to the action: Ensure the plan has due regard to environmental sensitivities associated with coastal areas such as the receiving marine environment, biodiversity, European sites, recreation and amenity value.



LACAP Action Reference	LACAP Action	Mitigation Measure
3.10	Develop a Carbon sequestration plan for Louth	Attach the following text to the action: whilst taking measures to promote the use of native plant species over non-natives, as appropriate.
3.11	Progress Flood defence schemes Dundalk-Ardee Flood relief and Drogheda & Baltray flood relief scheme	Attach the following text to the action: whilst having appropriate regard to environmental protection requirements associated with flood resilience development.
3.12	Implement Louth County Council hedgerow and trees policy	Attach the following text to the action: Ensure that the policy promotes the use of native species over non-natives and has due regard for water quality and soil stability issues.
3.13	Develop Louth County Wetland Action Plan	Attach the following text to the action: This plan shall be developed by a competent ecology team, and shall have due regard to the need to appropriately protect, conserve and enhance important habitats and species and European sites, and support the maintenance and improvement of water quality in line with the aims of the Water Framework Directive.
3.14	Ensure Sustainable Urban Drainage (SUDs) principles are implemented in Louth County Council works and conditioned, as appropriate, in grants of planning permission.	Attach the following text to the action: having due regard to promoting nature-based solutions, protection of biodiversity and avoidance of habitat fragmentation.
3.16	<ul style="list-style-type: none"> <li>Develop a pesticide use policy &amp; procedure for Louth County Council</li> </ul>	Attach the following text to the action: ensuring these substances are only used to a degree and an extent that does not cause significant effects on the receiving environment, such as the receiving water environment, biodiversity or European sites.
3.18	Alien invasive species plan for Louth	Attach the following text to the action: This plan shall be developed by a competent ecology team, and shall have due regard to the need to appropriately manage and prevent the spread of invasive species.
5.6	Develop a Clean Energy Policy for County Louth. This is to define the local authorities role in supporting green energy expansion and assess the current and emerging technologies.	Attach the following text to the action: Develop a Clean Energy Policy for County Louth. This is to define the local authorities role in supporting sustainable green energy expansion and assess the current and emerging technologies.
5.7	Support local level renewable energy and micro generation projects within county Louth and cooperate with neighbouring regions where opportunities are identified.	Attach the following text to the action: Promote - through control or influence as appropriate - project accordance with planning and environmental protection requirements.
5.9	Support civic amenity sites to implement best practise circular economy initiatives	Attach the following text to the action: whilst ensuring all supported initiatives accord with the provision of the Waste Management Act and do not lead to adverse environmental impacts or nuisance.
<b>DZ</b>		
6.2	<ul style="list-style-type: none"> <li>Identify a specific list of opportunities to deliver detailed carbon reduction projects for the DZ</li> </ul>	Attach the following text to the action: ensuring integrated environmental protection requirements are appropriately considered.



LACAP Action Reference	LACAP Action	Mitigation Measure
6.5	Develop an enhanced smarter mobility strategy for the DZ to focus on increasing the use of electric modes of transport	Attach the following text to the action: <b>having due regard to environmental sensitivities including sensitive human receptors, water quality, biodiversity, European sites, and available grid capacity.</b>
6.11	Enhance the biodiversity value of the green and blue spaces within the DZ through nature-based solutions to provide additional ecosystem services such as carbon sequestration, amenity areas and clean water	Attach the following text to the action: <b>having due regard for planning and development policy and environmental protection considerations during the masterplanning and development process.</b>
6.13	Examine the potential of maximising district heating opportunities within the DZ and support the implementation of the recommendations of the report. Raise awareness of the opportunities and benefits presented by district heating.	Attach the following text to the action: <b>Appropriate regard shall be had to planning and environmental protection requirements when investigating and progressing any development projects supported by this action.</b>
6.15	Support the establishment of renewable energy projects, small, medium and large that will contribute to the overall goals of DZ.	Attach the following text to the action: <b>Promote - through control or influence as appropriate - project accordance with planning and environmental protection requirements.</b>



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

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

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

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

**2.3 Appropriate Assessment**

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



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

## 2.4 Consultation on SEA Environmental Report

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

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



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

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



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



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>We recommend further engagement with relevant Departments/Bodies within NI and when required assessment of transboundary impacts and possibly further Environmental assessment and /or HRA at planning/project level.</p>	<p>Noted.</p>	<p>None</p>	<p>None.</p>
	<p>NED notes from Appendix 1 that a number of pieces of legislation and policy documents have not been included, the Environmental Report may benefit from the inclusion of these. Please see list below:</p> <p>It may be worth including in your considerations the following:</p> <ul style="list-style-type: none"> <li>• The Wildlife (NI) Order 1985 (as amended)</li> <li>• Wildlife and Natural Environment Act (NI) 2011</li> <li>• The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended)</li> <li>• The Environment (NI) Order 2002</li> <li>• The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017</li> <li>• The Strategic Planning Policy Statement (SPPS) for Northern Ireland</li> <li>• Planning Policy Statements (PPS – in particular PPS2 and PPS18). It should be noted that the PPS's will be superseded by Local Development Plans when they are adopted.</li> <li>• Biodiversity Strategy for NI to 2020  <a href="https://www.daera-ni.gov.uk/publications/biodiversity-strategy-northern-ireland-2020-0">https://www.daera-ni.gov.uk/publications/biodiversity-strategy-northern-ireland-2020-0</a></li> </ul>	<p>Noted.</p>	<p>Northern Irish plans and programmes have been reviewed and included in the NIR.</p>	<p>Northern Irish plans and programmes have been reviewed and included in the SEA ER.</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<ul style="list-style-type: none"> <li>• Draft Environment Strategy <a href="https://www.daera-ni.gov.uk/consultations/esni-public-discussion-document">https://www.daera-ni.gov.uk/consultations/esni-public-discussion-document</a></li> <li>• The Draft NI peatland policy: <a href="https://www.daera-ni.gov.uk/consultations/ni-peatland-strategy-consultation">https://www.daera-ni.gov.uk/consultations/ni-peatland-strategy-consultation</a>.</li> <li>• The Draft Green Growth Strategy <a href="#">Consultation on the draft Green Growth Strategy for Northern Ireland   Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk)</a></li> <li>• Northern Ireland Energy Strategy 2050 <a href="#">Northern Ireland Energy Strategy 2050   Department for the Economy (economy-ni.gov.uk)</a></li> </ul>			
	<p><b>Air Quality</b></p> <p>NIEA Natural Environment Division's Air Quality and Biodiversity Unit (AQBUI) have the following comments;</p> <ul style="list-style-type: none"> <li>• AQBUI acknowledge the objectives to reduce air pollution within County Louth.</li> <li>• Consideration should be given as to the potential impact of the Plan on other air pollutants such as agricultural ammonia, nitrogen oxides and resulting nitrogen deposition at both sites in the Republic of Ireland and NI (transboundary impacts). Consideration of any co-benefits should be included. E.g. protecting and restoring of peatlands can help to increase resilience to other threats and pressures, including the impacts of ammonia and nitrogen deposition on the vegetation and habitat.</li> </ul>	<p>The SEA found the Plan does not support any development or activities that may generate air agricultural ammonia or nitrogen oxides.</p>	<p>None</p>	<p>None</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Ireland is now included in the Air Pollution Information System (APIS) which provides information on the impacts of air pollutants, such as Nox, ammonia emissions and the associated N deposition on sensitive habitats and species. The map feature within APIS enables detailed information to be provided on the Critical Levels/Loads for each qualifying feature and background levels of these pollutants: <a href="#">APIS app</a>   <a href="#">Air Pollution Information System</a></p>			
	<p><b>Landscape Teams comments</b></p> <ul style="list-style-type: none"> <li>• The Landscape Team welcomes that Landscape and Visual amenity has been considered within the Objectives.</li> <li>• There may be potential for the programme to impact landscape and visual amenity of the Northern Ireland landscape, particularly in areas adjacent to the border, therefore consideration of potential transboundary landscape and visual impacts should be identified and considered with in this Environmental Report. There are several areas designated for their landscape quality located on or close to the border, such as Ring of Gullion Area of Outstanding Natural Beauty (AONB), the landscape around AONBs performs an important function by providing context, particularly in views to and from the AONB</li> </ul>	<p>It was noted that all effects of the plan have been evaluated (inclusive of effects that may be transmitted via environmental pathways to Northern Irish receptors). Mitigation measures have been adopted to ensure that the environmental effects of Plan Action are controlled at the source. The environmental assessment reports has been updated to include a greater level of detail on the Northern Irish baseline landscape and visual environment and to demonstrate more expressly how transboundary effects were considered and mitigated.</p>	<p>The NIR has been updated to demonstrate more expressly how transboundary effects were considered and mitigated.</p>	<p>The SEA ER has been updated to demonstrate more expressly how transboundary effects were considered and mitigated.</p>
	<p><b>Drinking Water Inspectorate Comments</b></p> <p>Thank you for consulting with DWI on the Louth County Council Draft Climate Action Plan 2024-2029, SEA environmental Report &amp; NIS. Upon review, DWI are content and are appreciative of SEO W5 relating to preventing the impact upon drinking water quality.</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>



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	<p><b>Marine and Fisheries Division</b></p> <p><b>Marine Plan Team</b></p> <p>The Marine Plan Team (MPT) DAERA – Marine &amp; Fisheries Division welcome the opportunity to comment on the SEA Environmental Report for Louth County Council’s Climate Action Plan. The adoption of the Louth County Council Draft Local Authority Climate Action Plan is required under the Climate Action and Low Carbon Development (Amendment) Act 2021; and must be consistent with the Climate Action Plan 2023 and the National Adaptation Framework. It is noted DAERA was not consulted at the Scoping stage. The ER is unclear on whether effects on the marine environment have been included. In addition, whilst the ER acknowledges that transboundary effects have been considered, these (including transboundary marine effects) are not apparent. The ER appears to contain gaps, particularly in relation to the topics on Seascape, Water and the Marine Strategy Framework Directive.</p>	<p>The impact on the marine environment has been comprehensively and appropriately assessed having regard to the nature, focus and scale of the Plan, the local authority’s remit and functions, and the defined climate action. Such assessment is discussed in the <i>‘Evaluation of the Environmental Effects of Plan Implementation.’</i> In the context of this submission, it is important to note the local authority has an advocacy/influencing role in relation to supporting renewable energy initiatives. Nonetheless, climate action in support of renewable energy has been progressed within an Environmental Governance Framework.</p> <p>It should be noted that the assessment refers to impacts on the ‘water’ environment at high-level, which is considered to be inclusive of surface waters, groundwater, transitional waters, coastal waters and the marine environment generally – both within the Republic of Ireland and across the border. Further, it was noted the definition of Surface Water encompasses Coastal and Transitional Waters - A discrete and significant element of surface water such as a lake, reservoir, stream, river or canal, part of a stream, river or canal, a transitional water or a stretch of coastal water. (European Communities Environmental Objectives (Surface Waters) Regulations, 2009).</p>	<p>The NIR has been updated to demonstrate more expressly how marine transboundary effects were considered and mitigated.</p>	<p>The SEA ER has been updated to demonstrate more expressly how marine transboundary effects were considered and mitigated. Impacts on Seascape in particular has been clarified.</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
		<p>The assessment refers to impacts on the 'biodiversity' environment, which is considered to be inclusive of the terrestrial, aquatic and marine biodiversity environments within the Republic of Ireland and across the border, as appropriate. Finally, it refers to impacts on the 'landscape' environment, which is considered to include inland water scape and marine scape (Note the European Landscape Convention's (ELC) definition of 'Landscape' as being '<i>natural, rural, urban and peri-urban areas. It includes land, inland water and marine areas.</i>' It was noted the term landscape and seascape is used interchangeably in the assessment which may have lead to a lack of clarity.</p> <p>A robust set of Plan-level mitigation measures have been defined to ensure that all environmental effects of Plan Action, including potential transboundary marine, biodiversity and seascape effects, are controlled at the source. For example, see environmental consideration text for Action 3.9 (as referenced in the Draft Plan published for consultation) and the Environmental Governance Principle framework defined to underpin all activities and development, including renewable energy related initiatives, supported by climate action in the Plan. Such effects are described in detail in Appendix 3.2 of the SEA ER generally, wherever appropriate.</p>		
	<p><u>Relevant Plans and Programmes</u></p> <p>From a transboundary marine perspective, the following Northern Ireland relevant plans and programmes should also have been considered:</p> <ul style="list-style-type: none"> <li>• The Draft Marine Plan for Northern Ireland 2018</li> </ul>	<p>Noted.</p>	<p>None.</p>	<p>Northern Irish plans and programmes has been reviewed and included in the SEA ER, as appropriate.</p>



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	<ul style="list-style-type: none"> <li>Towards an Integrated Coastal Zone Management Strategy 2006 - 2026. Further information on these can be found at Marine planning   Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk) and Towards an Integrated Coastal Zone Management Strategy for Northern Ireland 2006 - 2026   Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk)</li> </ul> <p><u>The Environmental Baseline</u></p> <p>Whilst, it is stated the ER has considered the zone of influence for the draft LACAP and includes baseline information beyond the draft boundary, this is not visible in the report, particularly in relation to the marine area and the shared waters of Carlingford Lough from a transboundary marine perspective.</p> <p>It would have been helpful if the baseline included information on:</p> <ul style="list-style-type: none"> <li>the achievement of good environmental status, in coastal and marine waters, as required under the Marine Strategy Framework Directive. In coastal waters, which extend out to 1 nautical mile, both WFD and the UK Marine Strategy Regulations apply, albeit only for those aspects of good environmental status not addressed by WFD.</li> <li>marine noise or the impact of noise on the marine area and its environment, particularly given it is a descriptor under MSFD.</li> </ul>	<p>See response above. Marine impacts have been adequately considered and mitigated against at source having regard to scope of the defined Climate Action, the remit and function of the Local Authority and nature of the Plan. Having regard to this commentary, additional information on the cross-border receiving marine environment has been provided for clarity.</p>	<p>The NIR has been updated to demonstrate more expressly how marine transboundary effects were considered and mitigated.</p>	<p>The SEA ER has been updated to demonstrate more expressly how marine transboundary effects were considered and mitigated.</p>



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	<ul style="list-style-type: none"> <li>Seascapes should have been included within the Landscape, Seascape and Visual Amenity section, given the Regional Seascape Character Assessments for Ireland, developed as part of the National Marine Planning Framework by the Marine Institute. In addition, from a transboundary perspective, the NI Regional Seascape Character Assessment should have also been included (Seascape Character Areas   Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk)).</li> </ul>			
	<p><u>Strategic Environmental Objectives</u></p> <p>The SEOs would have benefited from including a marine perspective, as this would have ensured the potential for effects in the marine area (including the transboundary marine area and its environment) would have been evident in the assessment. In this regard, the inclusion of an SEO to maintain and/or improve, the quality and status of marine and coastal waters, would have ensured the ER would have captured in the assessment any effects on each of the 11 descriptors set out in the Marine Strategy Framework Directive, particularly for those elements not covered by Water Framework Directive in coastal waters, to ensure full consideration of the marine environment and any potential transboundary effects. For Air and Noise, reference could have been made to avoid or minimise adverse noise impacts on the environment, including effects underwater to ensure effects on the marine environment were also considered. For Landscape, Seascape and Visual Amenity the SEOs should have made explicit reference to avoid or minimise impacts on seascape character</p>	<p>Noted. See response above in relation to scope of the environmental assessment undertaken. The 'water' environment considered in the assessment includes marine water. The 'biodiversity' environment includes marine biodiversity. The 'landscape' environment includes the marine scape, otherwise termed as seascape. SEOs have been defined for all environmental components considered within the scope of the assessment, however the focus and intended meaning of 'Water,' 'Noise' and 'Landscape, Seascape and Visual Amenity' SEOs has been clarified, as appropriate, having regard to this commentary.</p> <p>It was noted SEO L1 has the following target:</p> <p><i>'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.'</i></p>	None.	The focus and intended meaning of 'Water,' 'Noise' and 'Landscape, Seascape and Visual Amenity' SEOs has been clarified, as appropriate, having regard to this commentary.



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	<p><u>Evaluation of the Environmental</u></p> <p>Effects of Plan Implementation It is acknowledged the potential effects on a number of draft LACAP actions are unlikely to be affected by the gaps highlighted above. However, the likely significant effects on the marine area and its environment could have been made visible within the Environmental Report, along with any likely transboundary marine effects, particularly in relation to the Newry River and Carlingford Lough. The consideration of the potential for transboundary marine effects in the evaluation is not apparent.</p>	<p>It was noted that all potential effects of the plan have been evaluated, including transboundary effects and effects on the marine environment. Mitigation measures have been adopted to ensure that the environmental effects of Plan Action are controlled at the source.</p>	<p>None.</p>	<p>The SEA ER has been updated to demonstrate more expressly how transboundary and marine effects were considered and mitigated.</p>
	<p><u>Monitoring Measures</u></p> <p>As a result of gaps in the baseline and SEOs outlined above, the indicators and targets established for ongoing monitoring may need reviewed.</p>	<p>See responses above.</p>	<p>None.</p>	<p>Review of monitoring targets and indicators following any update to baseline/SEO details.</p>
	<p><u>Conclusion</u></p> <p>The marine aspect could have been enhanced within the SEA Environmental Report. This 'marine proofing' would have ensured a transparent and robust assessment in relation to the consideration and assessment of likely effects on the marine area and its environment, including any transboundary marine effects. Other teams within the Marine and Fisheries Division may have further comments.</p>	<p>See responses above.</p>	<p>None.</p>	<p>None.</p>
	<p><b>Marine Conservation Branch</b></p> <p>Marine Conservation Branch welcomes the opportunity to comment on the Louth County Council Draft Climate Action Plan 2024-2029, please find our comments below, particularly where the plan is to be implemented near Carlingford Lough.</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p><u>Draft Louth County Council Draft Climate Action Plan 2024-2029</u></p> <ul style="list-style-type: none"> <li>• On Page 32 under Objectives of Louth County Council Climate Action Plan, we advise considering Blue infrastructure (including nature-based solutions) and Blue space too.</li> <li>• In Section 3.18, we advise considering measures to prevent the introduction and/or spread of invasive non-native species.</li> <li>• In Table 7-1, we advise ensuring marine habitats and species are also considered. Furthermore, we advise considering Blue infrastructure and the measures to prevent the introduction as well as the spread of invasive non-native species.</li> <li>• In Appendix B we recommend considering The Climate Change Act (Northern Ireland) 2022.</li> <li>• In Appendix E, we recommend considering the potential impacts of the plan on coastal geomorphology. In addition, with sea level rise we recommend considering the potential impact of coastal squeeze.</li> </ul>	<p>It was noted that these points relate to the contents of the LACAP and are for the Council’s consideration.</p>	<p>None.</p>	<p>None.</p>
	<p><u>Annex 3: Local Authority Climate Action Plan – SEA Environmental Report</u></p> <ul style="list-style-type: none"> <li>• On <b>Page 3</b>, under Population and Human Health we recommend also considering recreational and development pressures on marine habitats and species.</li> <li>• On <b>Page 3</b>, under Biodiversity, Flora and Fauna we recommend also considering transboundary MPAs (including Nationally designated sites such as ASSIs and MCZs.) In addition, consider the potential for introduction of invasive non-native species.</li> </ul>	<p>It was noted that all effects of the plan have been evaluated, including transboundary effects. Mitigation measures have been adopted to ensure that the environmental effects of Plan Action are controlled at the source. The full and detailed environmental evaluation is presented in Appendix 3.2 of the SEA Environmental Report.</p>	<p>Additional information has been provided on cross-border protected sites for context.</p>	<p>Additional information has been provided on cross-border protected sites for context.</p>



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	<ul style="list-style-type: none"> <li>On <b>Page 8</b>, regarding the following statement: 'The plan supports the carrying out of a variety of coastal protection related action, including action intended n mitigating coastal flood or erosion risk.' We advise considering natural resilience, nature-based solutions and soft-engineering approaches.</li> <li>On <b>Page 8</b>, we welcome the following statement: 'The carrying out of coastal protection related action contained in the plan has the potential to create unintended and potentially significant negative environmental effects in the absence of appropriate mitigation including effects on the water or biodiversity environment'. We advise considering the potential impact to coastal processes potentially resulting in coastal erosion and subsequent impact to associated habitats and species.</li> </ul>	<p>It was noted that the potential impact to the coastal environment (including coastal processes which may lead to coastal erosion) and subsequent impacts have been considered for this plan through the SEA Environmental Report. Mitigation measures have been adopted to ensure that the environmental effects of Plan Action are controlled at the source (For example, see environmental consideration text added to Action 3.9 (which relates to coastal protection) as defined in the Plan).</p>	<p>None.</p>	<p>None.</p>
	<ul style="list-style-type: none"> <li>In <b>Section 3.3.3</b>, we advise DAERA needs to be added as a consultee.</li> </ul>	<p>It was noted that these points relate to the contents of the LACAP and are for the Council's consideration.</p>	<p>None.</p>	<p>None.</p>
	<ul style="list-style-type: none"> <li>In <b>Table 4-1</b>, we advise that where the plan is to be implemented near or hydrologically linked to Carlingford Lough the following transboundary MPAs need to be considered: Carlingford Lough ASSI, Carlingford Lough MCZ, Carlingford Lough SPA, Carlingford Marine pSPA and Carlingford Lough Ramsar Site. In addition, recent advice, relating to MPAs which have marine mammals as a site selection feature, recommends the following ranges should be used when screening for either Harbour (Phoca vitulina) or Grey seals (Halichoerus grypus) and Harbour porpoise (Phocoena phocoena):</li> <li>- all SACs within 100km of the project should be screened for Grey seals (Halichoerus grypus)</li> <li>- all SACs within 50km should be screened for Harbour seals (Phoca vitulina)</li> </ul>	<p>All plan actions were evaluated for their potential impact on the biodiversity environment. Appropriate mitigation measures have been defined to prevent the occurrence of significant effects on biodiversity or protected sites at source during Plan implementation, including protected sites across the border. An Environmental Governance Framework has been established to ensure activities and development supported by the Plan will not cause any negative environmental effects. The Council should have regard to this commentary when carrying out project level environmental assessment for development projects occurring at locations near to or hydrologically linked to these protected sites.</p>	<p>Additional information has been provided on cross-border protected sites for context.</p>	<p>Additional information has been provided on cross-border protected sites for context.</p>



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	<p>- all SACs within 100km should be screened for Harbour porpoise (<i>Phocoena phocoena</i>)</p> <p>Therefore, Murlough SAC and Strangford Lough SAC should be considered for Harbour seal and the North Channel SAC should be considered for Harbour seals.</p>	<p>The effect of construction activities that may be supported by Plan Action has been evaluated comprehensively in the detailed environmental assessment contained in Appendix 1. This assessment considered impacts on the water and biodiversity environments, including the marine environment and marine biodiversity.</p> <p>Potential invasive species impacts have been considered by the Environmental Report, as appropriate. It was noted the following environmental governance principles has been defined in the Plan:</p> <p><i>EG9 – ‘Ensure local authority projects supported by plan actions have taken the necessary precautions to identify and manage invasives species, particularly with regard to Schedule III species. No local authority climate action related development project that is likely to cause the spread of invasives species listed in Schedule III shall be supported.’</i></p> <p>All environmental effects have been adequately mitigated against.</p> <p>The Plan supports renewable energy initiatives generally and at high-level, not at project level. It is important to note a local authority’s limited remit in relation to the carrying out of marine based renewable energy development projects.</p>	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
		An adequate framework of environmental mitigation has been defined having regard to the focus and intent of Plan action, the environmental effects of such action, and the remit and scope of control and influence a local authority has.		
	<ul style="list-style-type: none"> <li>In Table 4-3, we recommend considering potential impacts on transboundary seascape particularly for green development such as offshore wind. Therefore, the Newry Estuary Regional Seascape Character Area and the Mourne Coast Regional Seascape Character Area should be considered (Northern Ireland Regional Seascape Character Assessment).</li> </ul>	Potential impacts on landscape inclusive of seascape have been adequately and appropriately considered and mitigated against in the assessment. Again, it is important to note a local authority remit and limited level of control and influence in connection with marine renewable energy developments. Plan Action relating to renewable energy initiative focusses on advocacy and engagement mainly.	None.	Additional information has been provided on cross-border protected sites for context.
	<ul style="list-style-type: none"> <li>In Section 4.10.9, we advise considering seascape.</li> </ul>	Seascape has been considered within the assessment as appropriate. It was noted the term 'landscape' used in the assessment is considered to include inland water scape and marine scape (Note the European Landscape Convention's (ELC) definition of 'Landscape' as being ' <i>natural, rural, urban and peri-urban areas. It includes land, inland water and marine areas.</i> ')	None.	Updated point 3 in section 4.10.9 to include the word "seascape" after the word "landscape".
	<ul style="list-style-type: none"> <li>In Table 7-1, we recommend considering coastal squeeze.</li> </ul>	The potential impact of infrastructure projects (supported by Plan action) has been comprehensively considered in the assessment, including the potential impact such infrastructure may have on the coastal environment (e.g., active travel development, coastal protection infrastructure, green infrastructure)	None.	None.
	<ul style="list-style-type: none"> <li>In Table 7-2, we advise considering a relationship between material assets and Biodiversity, Flora and Fauna as material assets can adversely impact biodiversity via coastal squeeze and construction disturbance.</li> </ul>	DAERA are correct to note the relationship between the development of material assets and the receiving biodiversity environment at coastal areas, and the potential for impacts (in the absence of any mitigation).	None.	Update Table 7-2 in the SEA ER to show theoretical impact interactions between Material Assets and Biodiversity.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
		In the case of this Plan, a framework of environmental mitigation has been defined to ensure the potential effects of all coastal activities development supported by the plan are adequately mitigated against.		
	<ul style="list-style-type: none"> <li>In Table 7.3.2, for 'Increased access to natural amenity sites' we advise considering the potential for invasive non-native species, marine mammal disturbance and marine litter.</li> </ul>	The effects of Plan Action has been adequately considered having regard to the nature, scope and focus of plan action. A suitable framework of environmental mitigation has been defined to prevent impacts on the water and biodiversity environments.	None.	None.
	<ul style="list-style-type: none"> <li>In Table 8-1, for 3.18, we advise considering the introduction of invasive non-native species.</li> </ul>	The effects of Plan Action has been adequately considered having regard to the nature, scope and focus of plan action. A suitable framework of environmental mitigation has been defined to prevent impacts on the water and biodiversity environments.	None.	None.
	<ul style="list-style-type: none"> <li>Table 9-1, W4: 'Minimize developments (supported by the plan) granted permissions on lands which pose – or are likely to pose in the future a significant flood risk.' We advise this statement being 'stronger' by stating 'Avoid' developments [...]. In addition, we recommend considering coastal squeeze and the potential impacts of coastal erosion.</li> </ul>	This target has been deemed appropriate. Development control will take place in accordance with the County Development Plan. Exceptions to the restriction of development due to potential flood risks are provided for in The Planning System and Flood Risk Management Guidelines for Planning Authorities through the use of a Justification Test, where the planning need and the sustainable management of flood risk to an acceptable level must be demonstrated.	None.	None.
	<ul style="list-style-type: none"> <li>In Appendix 1, we advise also considering the following:               <ul style="list-style-type: none"> <li>- All Ireland Rail Review</li> <li>- Newry, Mourne and Down District Council Local Development Plan</li> </ul> </li> </ul>	Noted	Northern Irish plans and programmes have been reviewed and included in the NIR.	Northern Irish plans and programmes have been reviewed and included in the SEA ER.



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	<p><b>Wildlife (Northern Ireland) Order 1985</b></p> <p>Attention is drawn to Article 10 of the Wildlife (Northern Ireland) Order 1985 (as amended) under which it is an offence to intentionally or recklessly disturb, capture, injure a Common seal (<i>Phoca vitulina</i>), Grey seal (<i>Halichoerus grypus</i>) or Basking shark (<i>Cetorhinus maximus</i>). In addition it is an offence to intentionally or recklessly, injure or kill a wild animal included in Schedule 5 of this Order. This includes Angel shark (<i>Squatina squatina</i>), Common skate (<i>Dipturus batis</i>), Short snouted seahorse (<i>Hippocampus hippocampus</i>), Spiny seahorse (<i>Hippocampus guttulatus</i>), Spiny lobster (<i>Palinurus elaphus</i>) and Fan mussel (<i>Atrina fragilis</i>).</p> <p>It is also an offence to intentionally or recklessly;</p> <ul style="list-style-type: none"> <li>• disturb any such animal while it is occupying a structure or place which it uses for shelter or protection,</li> <li>• damage or destroy, or obstruct access to, any structure or place which any such animal uses for shelter or protection,</li> <li>• damages or destroys anything which conceals or protects any such structure; or</li> <li>• to have in possession or control any live or dead wild animal included in Schedule 5 or any part of, or anything derived from, such an animal.</li> </ul> <p><b>Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995</b></p>	<p>Noted.</p>	<p>Northern Irish plans and programmes have been reviewed and included in the NIR.</p>	<p>Northern Irish plans and programmes have been reviewed and included in the SEA ER.</p>



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	<p>Attention is drawn to regulation 34 of The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended), which states that it is an offence to deliberately disturb, capture, injure or kill a wild animal of a European Protected Species included in Schedule 2 to these Regulations. This includes all species of dolphins, porpoises and whales and the marine turtle species.</p> <p>It is also an offence to;</p> <p>(a) deliberately obstruct access to a breeding site or resting place of such an animal,</p> <p>(b) damage or destroy a breeding site or resting place of such an animal, (c) keep, transport, sell or exchange, or offer for sale or exchange, any live or dead wild animal of a European protected species, or any part of, or anything derived from, such an animal.</p> <p><b>Wildlife and Natural Environment Act (Northern Ireland) 2011</b></p> <p>Wildlife and Natural Environment Act (Northern Ireland) 2011 (legislation.gov.uk)</p> <p><b>Marine Act (Northern Ireland) 2013</b></p> <p>The Marine Act (Northern Ireland) 2013 requires DAERA to establish a network of MPAs in the Northern Ireland inshore region that, together with MPAs designated by the other UK administrations, contributes to the conservation and improvement of the marine environment in the UK marine area. Marine Act (Northern Ireland) 2013</p>			



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	<p><b>An Integrated Coastal Zone Management Strategy for Northern Ireland 2006-2026</b></p> <p>This strategy is intended to set out long-term objectives for achieving sustainable coastal management, through improvements to existing management systems, the development of new management systems and identifying and dealing with potential areas of conflict. The strategy is based around 4 broad themes, consistent with the principles of sustainable development. Most relevant to this work is Priority 2: Safeguarding and improving the environment within the coastal zone and Priority 4: integration of planning and effort. Each theme has a set of aims for delivery.</p> <p><b>Northern Ireland Regional Seascape Character Assessment 2014</b></p> <p>The aim of this study is to provide a strategic understanding of different areas of regional seascape character along the entire Northern Ireland coast, complementing similar assessments undertaken elsewhere in the UK. This will contribute to the aims of the European Landscape Convention through promoting the protection, management and planning of the seascape, and to support European cooperation on landscape issues.</p>			
	<p><u><a href="#">Annex 4: Louth Local Authority Climate Action Plan 2024-2029 – Natura Impact Report</a></u></p> <ul style="list-style-type: none"> <li>In Section 3.2, we welcome the inclusion of Carlingford Lough SPA however, the following should also be considered:</li> </ul> <p>- Carlingford Lough Ramsar Site</p>	<p>All plan actions have been evaluated for their potential impact on the biodiversity environment. Appropriate mitigation measures have been defined to prevent the occurrence of significant effects on biodiversity or protected sites at source during Plan implementation, including protected sites across the border.</p>	<p>Additional information has been provided on cross-border protected sites for context.</p>	<p>None.</p>



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	<p>- Carlingford Marine pSPA</p> <p>In addition, recent advice, relating to MPAs which have marine mammals as a site selection feature, recommends the following ranges should be used when screening for either Harbour (Phoca vitulina) or Grey seals (Halichoerus grypus) and Harbour porpoise (Phocoena phocoena):</p> <p>- all SACs within 100km of the project should be screened for Grey seals (Halichoerus grypus)</p> <p>- all SACs within 50km should be screened for Harbour seals (Phoca vitulina)</p> <p>- all SACs within 100km should be screened for Harbour porpoise (Phocoena phocoena) Therefore, Murlough SAC and Strangford Lough SAC should be considered for Harbour seal and the North Channel SAC should be considered for Harbour seals.</p>	<p>An Environmental Governance Framework has been established to ensure activities and development supported by the Plan will not cause any negative environmental effects. The Council should have regard to this commentary when carrying out project level environmental assessment for development projects occurring at locations near to or hydrologically linked to these protected sites.</p>		
	<p>Furthermore, the above also needs to be included in Table 3-1, Table 4-1 and Appendix 1.</p>	<p>Additional information has been provided on cross-border protected sites for context.</p>	<p>Additional information has been provided on cross-border protected sites for context.</p>	<p>Additional information has been provided on cross-border protected sites for context.</p>
	<ul style="list-style-type: none"> <li>In Table 5-1, in 3.9, we advise that Nature-Based Solutions should be considered to protect coastal areas from coastal erosion</li> </ul>	<p>A comprehensive environmental governance framework which promotes the use of nature-based solutions has been defined in the Plan. All coastal protection action has been underpinned and guided by this framework.</p>	<p>Noted.</p>	<p>Noted.</p>
	<ul style="list-style-type: none"> <li>Appendix 1 we advise also considering the following:               <ul style="list-style-type: none"> <li>All Ireland Rail Review</li> <li>Newry, Mourne and Down District Council Local Development Plan</li> </ul> </li> </ul>	<p>Noted (previously stated).</p>	<p>Northern Irish plans and programmes have been reviewed and included in the NIR.</p>	<p>Northern Irish plans and programmes have been reviewed and included in the SEA ER.</p>



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	<p><b>Wildlife (Northern Ireland) Order 1985</b></p> <p>Attention is drawn to Article 10 of the Wildlife (Northern Ireland) Order 1985 (as amended) under which it is an offence to intentionally or recklessly disturb, capture, injure a Common seal (<i>Phoca vitulina</i>), Grey seal (<i>Halichoerus grypus</i>) or Basking shark (<i>Cetorhinus maximus</i>). In addition it is an offence to intentionally or recklessly, injure or kill a wild animal included in Schedule 5 of this Order. This includes Angel shark (<i>Squatina squatina</i>), Common skate (<i>Dipturus batis</i>), Short snouted seahorse (<i>Hippocampus hippocampus</i>), Spiny seahorse (<i>Hippocampus guttulatus</i>), Spiny lobster (<i>Palinurus elaphus</i>) and Fan mussel (<i>Atrina fragilis</i>).</p> <p>It is also an offence to intentionally or recklessly;</p> <ul style="list-style-type: none"> <li>• disturb any such animal while it is occupying a structure or place which it uses for shelter or protection,</li> <li>• damage or destroy, or obstruct access to, any structure or place which any such animal uses for shelter or protection,</li> <li>• damages or destroys anything which conceals or protects any such structure; or</li> <li>• to have in possession or control any live or dead wild animal included in Schedule 5 or any part of, or anything derived from, such an animal.</li> </ul>	<p>Noted (previously stated).</p>	<p>Northern Irish plans and programmes have been reviewed and included in the NIR.</p>	<p>Northern Irish plans and programmes have been reviewed and included in the SEA ER.</p>



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	<p><b>Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995</b></p> <p>Attention is drawn to regulation 34 of The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended), which states that it is an offence to deliberately disturb, capture, injure or kill a wild animal of a European Protected Species included in Schedule 2 to these Regulations. This includes all species of dolphins, porpoises and whales and the marine turtle species.</p> <p>It is also an offence to;</p> <p>(d) deliberately obstruct access to a breeding site or resting place of such an animal,</p> <p>(e) damage or destroy a breeding site or resting place of such an animal,</p> <p>(f) keep, transport, sell or exchange, or offer for sale or exchange, any live or dead wild animal of a European protected species, or any part of, or anything derived from, such an animal.</p> <p><b>Wildlife and Natural Environment Act (Northern Ireland) 2011</b></p> <p>Wildlife and Natural Environment Act (Northern Ireland) 2011</p>			



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	<p><b>Marine Act (Northern Ireland) 2013</b></p> <p>The Marine Act (Northern Ireland) 2013 requires DAERA to establish a network of MPAs in the Northern Ireland inshore region that, together with MPAs designated by the other UK administrations, contributes to the conservation and improvement of the marine environment in the UK marine area.</p> <p><b>An Integrated Coastal Zone Management Strategy for Northern Ireland 2006-2026</b></p> <p>This strategy is intended to set out long-term objectives for achieving sustainable coastal management, through improvements to existing management systems, the development of new management systems and identifying and dealing with potential areas of conflict. The strategy is based around 4 broad themes, consistent with the principles of sustainable development. Most relevant to this work is Priority 2: Safeguarding and improving the environment within the coastal zone and Priority 4: integration of planning and effort. Each theme has a set of aims for delivery.</p> <p><b>Northern Ireland Regional Seascape Character Assessment 2014</b></p> <p>The aim of this study is to provide a strategic understanding of different areas of regional seascape character along the entire Northern Ireland coast, complementing similar assessments undertaken elsewhere in the UK. This will contribute to the aims of the European Landscape Convention through promoting the protection, management and planning of the seascape, and to support European cooperation on landscape issues.</p>			



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	<p>Ireland’s seafood industry (fishing and aquaculture) is one of the key stakeholders operating in the marine area and plays a vital role in the sustainability of our coastal communities. Over 15,000 people are employed around our coast both directly and indirectly. Many of these communities have very limited alternative employment and economic activity options. It is therefore essential that the socio-economic reliance on the seafood sector is fully recognised and is factored into any Climate Change Action plan. Fishing and food security is as key a part of Government Policy. Food Vision 2030 recognises and values the role of primary food producers.</p>	<p>Noted.</p>	<p>None</p>	<p>None.</p>
	<p>The Seafood industry is experiencing a period of difficult change, arising from the ongoing consequences of the EU UK Trade and Co-operation agreement which are specific and impactful on Ireland’s seafood sector. There is now ever-increasing demand on the marine space from Offshore Renewable Energy (ORE), Marine Spatial Planning, Marine Protected Areas (MPAs), and other environmental measures.</p>	<p>Noted.</p>	<p>None</p>	<p>None.</p>
	<p>Our coastal communities and maritime sectors will continue to play a significant role in contributing to our climate goals and will continue to be consulted and supported in the transition to carbon neutrality. The seafood industry, through both the Sectoral Adaptation Plan (<a href="#">Agriculture, Forest and Seafood Climate Change Sectoral Adaptation Plan</a>) and the annual Climate Action Plan (<a href="#">CAP23</a>) continue to support initiatives to improve understanding of our marine area and ensure sustainable resource use, including through bio and circular economy initiatives. These plans require consideration in the SEA process.</p>	<p>The National Climate Action Plan (2023) and Sectoral Adaptation Plans have been considered in the SEA Process. The relationship of the Plan with other relevant Plans and Programmes has been defined in Appendix 1 of the SEA. Inter-plan cumulative effects have been evaluated in Section 7 of the SEA ER.</p>	<p>None</p>	<p>None.</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	Also for consideration in the SEA process is the European Commission's Communication on the energy transition of the fisheries and aquaculture sector as part of its Fisheries Policy Package. This proposes the establishment of an Energy Transition Partnership (ETP) to develop a roadmap for the energy transition of the sector towards climate neutrality by 2050. The roadmap will set out investment needs, sector initiatives and inform policy decisions to help achieve this transition. The ETP is a multi-stakeholder platform intended to promote co-operation, knowledge sharing and dialogue between private and public stakeholders in order to accelerate the energy transition in the fisheries and aquaculture sector. This Partnership will help to shape the development of future transitional actions for Ireland's seafood sector. Local authorities should include relevant steps to support a Just Transition for the sea fisheries and aquaculture sectors in their Climate Action Plans.	This commentary has been noted. Local authorities in Ireland do not have a direct remit over the fisheries and aquaculture sector. The actions defined in the Plan are however mutually symbiotic and harmonious with the vision and measures defined in European Commission's Communication on the energy transition of the fisheries and aquaculture sector. Insofar as the local authority's remit extends, the plan supports the protection and enhancement of the marine environment. The climate action defined in the plan has the potential to generate multiple climate action benefits, and co-benefits for the water and biodiversity environments and by extension the marine environment (i.e. biodiversity conservation and enhancement, coastal protection, water quality protection and improvements etc.).	Reference has been made to the European Commission's Communication on the energy transition of the fisheries and aquaculture sector in Section 3.4 - <i>In-combination effects with Other Plans and Programmes</i> , and Appendix 2 - <i>Relationship with other plans and programmes</i> , as appropriate.	Reference has been made to the European Commission's Communication on the energy transition of the fisheries and aquaculture sector in Section 7.3 - <i>Potential Cumulative Effect of the LACAP in combination with other Plans and Projects</i> , and Appendix 1 - <i>Relationship of the Plan with other relevant Plans and Programmes</i> , as appropriate.
Historic Environment Division	DfC Historic Environment Division (HED) operate via a Service Level Agreement with colleagues in DAERA in relation to SEA, whereby we provide authoritative comment and advice in relation to matters of Cultural Heritage including archaeological and architectural heritage. We make the following comments in respect of the documentation received by our office on 23/11/2023.	Noted.	None.	None.
	Given the intertwined nature of the historic environment with landscape and the natural environment, HED advise that consideration of the potential for transboundary impacts in the Cultural Heritage topic area, particularly with regard to potential impacts on setting of assets would be relevant. A large number of heritage assets predate the border itself and correlate to other assets in either jurisdiction, with interweaving views and settings, and some assets such as ancient earthworks, routeways and canals traverse it.	It was noted that all effects of the plan have been evaluated, including transboundary effects. Mitigation measures have been adopted to ensure that the environmental effects are controlled at the source.  It was recommended the local authority consult Northern Ireland's historic environment digital datasets when progressing development projects, as appropriate.	None.	The SEA ER has been updated to include a clear statement on transboundary effects, explaining how they are considered and mitigated.



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	<p>In terms of consideration of potential measures and mitigation of such transboundary effects we advise that Northern Ireland’s historic environment digital datasets might be utilized during future assessments or at project specific level to further understand potential for impacts, including those on setting of heritage assets. Historic Environment Digital Datasets Department for Communities (communities-ni.gov.uk) We also attach a link to our historic environment map viewer Historic Environment Map Viewer Department for Communities (communities-ni.gov.uk)</p>			
	<p>Datasets specific to Northern Ireland’s marine historic environment, including around wrecks</p> <p>and reported losses can be obtained through contacting <a href="mailto:colin.dunlop@daera-ni.gov.uk">colin.dunlop@daera-ni.gov.uk</a></p> <p>We also take this opportunity to signpost our resources on Heritage and Climate Change   Department for Communities (communities-ni.gov.uk), as we work in partnership with others who manage the historic environment, including through a North South Memorandum of understanding on Climate Action and Cultural Heritage.</p>	Noted.	None.	None.
Sea Fisheries coordination DAFM	Ireland’s seafood industry (fishing and aquaculture) is one of the key stakeholders operating in the marine area and plays a vital role in the sustainability of our coastal communities. Over 15,000 people are employed around our coast both directly and indirectly. Many of these communities have very limited alternative employment and economic activity options. It is therefore essential that the socio-economic reliance on the seafood sector is fully recognised and is factored into any Climate Change Action plan. Fishing and food security is as key a part of Government Policy. Food Vision 2030 recognises and values the role of primary food producers.	Noted.	None	None.



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	The Seafood industry is experiencing a period of difficult change, arising from the ongoing consequences of the EU UK Trade and Co-operation agreement which are specific and impactful on Ireland’s seafood sector. There is now ever-increasing demand on the marine space from Offshore Renewable Energy (ORE), Marine Spatial Planning, Marine Protected Areas (MPAs), and other environmental measures.	Noted.	None	None.
	Our coastal communities and maritime sectors will continue to play a significant role in contributing to our climate goals and will continue to be consulted and supported in the transition to carbon neutrality. The seafood industry, through both the Sectoral Adaptation Plan (Agriculture, Forest and Seafood Climate Change Sectoral Adaptation Plan ) and the annual Climate Action Plan (CAP23 ) continue to support initiatives to improve understanding of our marine area and ensure sustainable resource use, including through bio and circular economy initiatives. These plans require consideration in the SEA process.	The National Climate Action Plan (2023) and Sectoral Adaptation Plans have been considered in the SEA Process. The relationship of the Plan with other relevant Plans and Programmes has been defined in Appendix 1 of the SEA. Inter-plan cumulative effects have been evaluated in Section 7 of the SEA ER.	None	None.
	Also for consideration in the SEA process is the European Commission’s Communication on the energy transition of the fisheries and aquaculture sector as part of its Fisheries Policy Package. This proposes the establishment of an Energy Transition Partnership (ETP) to develop a roadmap for the energy transition of the sector towards climate neutrality by 2050. The roadmap will set out investment needs, sector initiatives and inform policy decisions to help achieve this transition. The ETP is a multi-stakeholder platform intended to promote co-operation, knowledge sharing and dialogue between private and public stakeholders in order to accelerate the energy transition in the fisheries and aquaculture sector. This Partnership will help to shape the development of future transitional actions for Ireland’s seafood sector.	This commentary was noted. Local authorities in Ireland do not have a direct remit over the fisheries and aquaculture sector. The actions defined in the Plan are however mutually symbiotic and harmonious with the vision and measures defined in European Commission’s Communication on the energy transition of the fisheries and aquaculture sector. Insofar as the local authority’s remit extends, the plan supports the protection and enhancement of the marine environment. The climate action defined in the plan has the potential to generate multiple climate action benefits, and co-benefits for the water and biodiversity environments and by extension the marine environment (i.e. biodiversity conservation and	Reference was made to the European Commission’s Communication on the energy transition of the fisheries and aquaculture sector in Section 3.4 - In-combination 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 Effect 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.



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	Local authorities should include relevant steps to support a Just Transition for the sea fisheries and aquaculture sectors in their Climate Action Plans.	enhancement, coastal protection, water quality protection and improvements etc.).		
Fair Seas	Fully functioning and healthy seas are our greatest ally or 'Nature Based Solution' in tackling climate change regarding mitigation (e.g., the sequestration of carbon from the atmosphere through 'Blue Carbon' marine habitats and species such as seagrass meadows) and adaptation (e.g., marine habitats providing protection from coastal erosion and flooding such as saltmarsh, sand dunes and seagrass meadows). Therefore, Fair Seas are encouraged to see the importance of biodiversity conservation recognised as an important part of climate action 'Climate action often involves protecting and restoring ecosystems, which not only helps mitigate climate change but also preserves biodiversity, supporting essential ecosystem services and maintaining a healthy balance in natural environments', and fully support the actions laid out in strategic Goal 3: Natural and Green Infrastructure including restoration of habitats and a focus on carbon sequestration.	Noted.	None.	None.
	However, we strongly suggest that an even greater emphasis on the role of biodiversity, and particularly the protection and restoration of marine biodiversity is warranted as the draft Climate Action Plan is progressed and associated actions finalised. The climate and biodiversity crises are inextricably linked and therefore a more joined-up and ecosystem-based approach is needed to address them, especially at the local authority level.	The Plan strongly supports biodiversity protection, restoration and enhancements. The enhancement of 'Green Infrastructure' has been defined as a Strategic Goal in the Plan. Multiple actions have been defined to support biodiversity.	None.	None.
	The protection and restoration of the environment, including the coastal marine environment is vital for coastal communities which are adapting to and growing resilience against the impacts of climate change. Therefore, Fair Seas recommends that Louth County Council;	Noted.	None.	None.



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	<p>(1) Support coastal communities in identifying coastal Marine Protected Areas (MPA) which would be designated under EU or National law (new national marine Protected Area legislation is due in 2024) to safeguard and enhance ecosystem services such as carbon sequestration, coastal erosion, and flooding protection and resilience, which would simultaneously improve marine biodiversity in the area. Bottom-up, community initiated and local stakeholder led protected areas are often the most successful in delivering positive outcomes for nature and climate.</p> <p>Fair Seas believe that Ireland’s forthcoming new MPA legislation must include;</p> <p>(a) Ambitious MPA legislation and targets as soon as possible to protect and restore marine biodiversity enshrining the 30% of Irish waters in a MPA by 2030, as well as a 10% strictly protected targets into law;</p> <p>(b) Robust marine protected area management which ensures these sites are effective and deliver for nature;</p> <p>(c) Principled and high quality stakeholder participation in MPA site selection, monitoring and management with a clear timeframe of delivery.</p>	<p>Noted. It was recommended that the Council consider this, as appropriate.</p>	<p>None.</p>	<p>None.</p>
	<p>(2) Conduct feasibility studies for developing a Marine Protected Area along the Louth coast for the restoration of biodiversity including climate important habitats, species and ecological processes (e.g., oyster beds, shellfish beds, seagrass beds and kelp forests, saltmarsh, carbon sequestration, coastal defence)</p>	<p>Noted. It was recommended that the Council consider this, as appropriate.</p>	<p>None.</p>	<p>None.</p>



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	<p>(3) Carry out a marine ecosystem service assessment of the Louth coast to inform the development of a flagship marine restoration and conservation initiative which protects and enhances marine biodiversity as well as ecological processes important for mitigating and adapting to climate change such as carbon sequestration by seagrass meadows, or saltmarsh and sand dunes for coastal protection.</p> <p>Carry out marine natural capital analysis to understand how much County Louth's coastal and marine habitats contribute towards local economies when they are in a healthy state and the economic losses that could be suffered if they continue to become degraded. Nature restoration and the protection of ecosystems that store carbon and protect us from climate change is not a 'cost' but an investment. For example, studies show that restored natural habitats such as mangroves are extremely cost effective at preventing flooding, providing \$100,000s/ha in flood protection benefits over project lifetimes. Saltmarsh and seagrass meadows provide similar flood, coastal erosion and storm surge protection on the Irish coast.</p> <ul style="list-style-type: none"> <li>- These assessments should be progressed using local expertise and organisations, citizens science and academic institutes working together in and for the community.</li> <li>- These assessments should be used to develop a prioritisation process of conservation actions which sets out how existing vulnerable, threatened and rare species, habitats and ecological processes should be protected and restored as soon as possible.</li> </ul>	<p>Noted. It was recommended that the Council consider this, as appropriate.</p>	<p>None.</p>	<p>None.</p>
	<p>(4) Form a MPA working group which is tasked with developing, actioning and enforcing management in Louth's current marine and coastal protected sites (Natura 2000 &amp; Natural Heritage Areas), as well as raising awareness, outreach and education of the role of the ocean in addressing the twin climate and biodiversity crises.</p>	<p>Noted. It was recommended that the Council consider this, as appropriate.</p>	<p>None.</p>	<p>None.</p>



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	<p>- Ireland's current Natura 2000 sites at sea lack effective management measures, whereas, if managed properly and with the help of local authorities, these areas could help coastal ecosystems and communities achieve greater levels of climate resilience and ecosystem health.</p>			
	<p>Fully functioning and healthy seas are our greatest ally or 'Nature Based Solution' in tackling climate change regarding mitigation (e.g., the sequestration of carbon from the atmosphere through 'Blue Carbon' marine habitats and species such as seagrass meadows) and adaptation (e.g., marine habitats providing protection from coastal erosion and flooding such as saltmarsh, sand dunes and seagrass meadows). Therefore, Fair Seas are encouraged to see the importance of biodiversity conservation recognised as an important part of climate action 'Climate action often involves protecting and restoring ecosystems, which not only helps mitigate climate change but also preserves biodiversity, supporting essential ecosystem services and maintaining a healthy balance in natural environments', and fully support the actions laid out in strategic Goal 3: Natural and Green Infrastructure including restoration of habitats and a focus on carbon sequestration.</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>
	<p>However, we strongly suggest that an even greater emphasis on the role of biodiversity, and particularly the protection and restoration of marine biodiversity is warranted as the draft Climate Action Plan is progressed and associated actions finalised. The climate and biodiversity crises are inextricably linked and therefore a more joined-up and ecosystem-based approach is needed to address them, especially at the local authority level.</p>	<p>The Plan strongly supports biodiversity protection, restoration and enhancements. The enhancement of 'Green Infrastructure' has been defined as a Strategic Goal in the Plan. Multiple actions have been defined to support biodiversity.</p>	<p>None.</p>	<p>None.</p>



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Department of Housing, Local Government and Heritage	<p><b>Archaeology</b></p> <p>The Department welcomes the publication of local authority draft Climate Change Adaptation Strategy. The Department draws your attention to the <b>Climate Change Sectoral Adaptation Plan (CCSAP) for Built and Archaeological Heritage (2019)</b> prepared as part of the National Adaptation Framework. The Climate Change Sectoral Adaptation Plan identifies the priority impacts for the built and archaeological heritage based on current climate change projections.</p>	Noted.	The reports and appendices were updated to account for the contents of the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019).	The reports and appendices were updated to account for the contents of the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019).
	<p>The Heritage Division of the Department is engaged with the local authorities through the departmental Climate Change Advisory Group and established Working Groups to ensure a consistent approach to protection and adaptation of heritage assets across the country and an alignment of policies, plans and actions across national, regional and local climate action. The Department anticipates ongoing engagement with the local authorities throughout the implementation of current and future sectoral adaptation plans.</p>	Noted.	None.	None.
	<p>In the preparation and implementation of the local authority adaptation strategy, there are a number of issues regarding protection of built and archaeological heritage that the Department recommends be taken into account to identify the heritage assets at risk in its area, assess their vulnerability to climate change, increase their resilience and develop disaster risk reduction policies for direct and indirect risks. For example, it is recommended that the strategies should consider:</p>	NA	None.	None.
	<ul style="list-style-type: none"> <li>Identifying the built and archaeological heritage assets in the local authority area including, but not restricted to, structures and sites subject to statutory protection under the National Monuments Acts 1930 to 2014, or the Planning and Development Acts.</li> </ul>	It is acknowledged that the SEA scoping report and SEA Environmental Report consider the archaeological heritage assets in the LA including structures and sites subject to statutory protection under the National Monuments Acts 1930 to 2014, and the Planning and Development Acts.	None.	None.



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		They do not, however, provide an exhaustive list of these items. Such a list is provided in Appendix 4 of the County Development Plan which was used to inform this process.		
	Including objectives to carry out climate change risk assessments, including condition assessments, for the historic structures and sites in its area	The Council intend on carrying out Climate Change Risk Assessment for assets under its remit under Action 2.11.	None.	None.
	Including objectives to develop disaster-risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area	Noted. It was recommended that the LA consider this as appropriate.	None.	None.
	Including objectives to develop resilience and adaptation strategies for the built and archaeological heritage in its area.	Noted. Such adaptation action has been defined in the Plan.	None.	None.
	Developing the skills capacity within the local authority to address adaptation/mitigation/emergency management issues affecting heritage assets in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works.	Noted. It was recommended that the LA consider this as appropriate.	None.	None.
	This Department will shortly be publishing a new guidance document Improving Energy Efficiency in Traditional Buildings. This guidance will assist retrofitting installers and specifiers in how best to choose and apply energy efficiency measures to the historic building stock. The guidance is also intended to assist building owners and occupants in making decisions about upgrading their buildings, many of which are of architectural heritage significance. It is recommended that all proposed retrofitting projects undertaken or supported by the local authority to buildings of traditional construction should follow the principles and practice set out in that guidance	Noted. It was recommended that the LA consider this as appropriate. The SEA Environmental Report has defined mitigation measures within the plan to ensure that any retrofitting of buildings including protected structures is carried out in a manner that doesn't impinge on built heritage or protected structures.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Finally, it is recommended that, where such officers are employed, the Architectural Conservation Officer, Heritage Officer and Archaeologist should be included on the local authority's Adaptation Steering Group.</p>	<p>Noted. It was recommended that the LA consider this as appropriate.</p>	<p>None.</p>	<p>None.</p>
	<p><b>Nature Conservation</b></p> <p>Having considered the Draft Louth County Council Climate Action Plan 2024-2029 and supporting documentation the Department welcomes the commitment evident in it to implementing measures which should help contribute substantially to conserving the natural heritage including the biodiversity of the County.</p> <p>In particular, the various actions set out in relation to Strategic Goal 3: Natural Environment and Green Infrastructure of the Draft Climate Action Plan, such as Action 3.1 'Support the full delivery of the Local biodiversity Action Plan for County Louth 2021-2026', 3.2 'Develop a new Local Biodiversity Action Plan for County Louth...', and 3.4 'Enact all local authority actions in Ireland's 4th National Biodiversity Action Plan 2023-2027', should significantly benefit the indigenous flora and fauna of County Louth. The emphasis on preserving natural and semi-natural habitats as set out in Actions 3.12 'Implement Louth County Council hedgerow and tree policy...' and 3.13 'Develop Louth County Wetland Action Plan...' is to be especially welcomed, as such an approach is undoubtedly likely to be the most effective in conserving the greatest possible diversity of plant and animal species in the County as well as dovetailing with the aim of the Climate Action Plan to contribute to reducing atmospheric CO2 by promoting the development of local carbon sinks.</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	The recognition of the value of the natural habitats of the Dundalk area and its vicinity and the species they support, particularly migratory water birds frequenting the adjacent coastal zones, set out in Annex 2 of the Climate Action Plan 'Dundalk Blackrock Decarbonising Zone 2030' is likewise appreciated by the Department. The policies set out in this document of enhancing the biodiversity of green and blue spaces in the Dundalk/Blackrock area and of investigating the possibility of restoring seagrass beds in Dundalk Bay will similarly promote both the conservation of local native plant and animal populations and natural carbon capture	Noted.	None.	None.
	The Department also notes however, that as set out on page 8 of 'Dundalk Decarbonising Zone 2030', Louth County Council intends to capitalise upon the proposed construction of flood defences from Blackrock to Bellurgan to provide a potential section of the Great Eastern Greenway from Belfast to Dublin, and cautions that the incorporation of a greenway into the coastal defence works in this area will only be possible if it can be proven that any resulting possible increased disturbance by humans and their dogs to the Qualifying Interest (QI) habitats and Special Conservation Interest (SCI) bird species which the Dundalk Bay Special Area of Conservation (SAC) and Dundalk Bay Special Protection Area (SPA) have respectively been designated to protect will not have adverse effects on these QIs/SCIs.	At plan-level, the effects of climate action supporting active travel and green infrastructure initiatives have been adequately assessed and mitigated against.  It was recommended that the Council should have regard to this commentary when progressing the Great Eastern Greenway project (which will be subject to project level EIA and AA, as appropriate).	None.	None.
	You are requested to send any further communications to this Department's Development Applications Unit (DAU) at <a href="mailto:manager.dau@npws.gov.ie">manager.dau@npws.gov.ie</a> where used, or to the following address: The Manager Development Applications Unit (DAU), Government Offices, Newtown Road, Wexford Y35 AP90	Noted. It was recommended that the LA consider this as appropriate.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
Uisce Éireann	<p>Uisce Éireann are developing sustainability plans for implementation with particular focus on energy efficiency, climate change, circular economy, supply chain, biodiversity, collaboration, integrated catchment management, social responsibility and innovation. The consequences of climate change for our planet are far reaching, with significant impacts on water resources and infrastructure. Sustained periods of low rainfall and warm temperature may impact our ability to sustainably abstract and supply water. In addition, reduced flows in receiving waters due to extended dry periods, will reduce the available assimilative capacity for treated wastewater. Climate change will also result in more intense rainfall and greater frequency of storm events. This will result in more frequent flooding due to the capacity of the wastewater network being exceeded and greater environmental impacts from storm water overflows. While this will bring the need for more investment to ensure climate resilient water services, we also believe that it is important that national and local policy supports and promotes the widespread adoption of blue-green infrastructure in our towns and cities together with innovative nature-based solutions. In this regard we welcome Louth County Council's commitment to "Develop and implement a Nature-Based Solutions (NBS) and integrated rainwater management protocol for both Council and private sector projects".</p> <p>We also welcome the Council's commitment to "Enhance the biodiversity value of the green and blue spaces within the DZ through nature-based solutions to provide additional ecosystem services such as carbon sequestration, amenity areas and clean water".</p>	Noted.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p><b>Sustainable Urban Drainage and Integrated Urban Wastewater Management Plans</b></p> <p>Widespread adoption of blue-green infrastructure in towns and cities would take pressure off the combined sewer and storm sewer networks, contribute to climate resilience, improve water quality, provide more livable spaces and also generate capacity for compact growth as set out in the National Planning Framework. To maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted by Uisce Éireann. The removal of stormwater from combined sewers using Sustainable Urban Drainage Systems and Green-Blue Infrastructure in new developments, and retrofitted in existing developed areas, is strongly encouraged. We welcome the Council’s commitment to “Deliver a housing sustainable policy for Louth County Council” and to “Ensure Sustainable Urban Drainage (SUDs) principles are implemented in Louth County Council works and conditioned, as appropriate, in grants of planning permission. Having due regard to promoting nature-based solutions, protection of biodiversity and avoidance of habitat fragmentation”.</p>	Noted.	None.	None.
	<p>We would welcome in particular consideration of the following guidance when considering nature-based solutions and sustainable urban drainage:</p> <ul style="list-style-type: none"> <li>• Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document</li> <li>• National (Infrastructure) Guidelines and Standards Group recent NGS Circular 1 of 2023,</li> </ul>	It was recommended that the Council consider the guidance referenced, as appropriate.	None	None



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<ul style="list-style-type: none"> <li>DMURS Advice Note 5 Road and Street Drainage using Nature Based Solutions Design</li> <li>Greening and Nature-based SuDS for Active Travel Schemes - National Transport</li> <li>Guidance for Urban watercourses by Inland Fisheries Ireland.</li> </ul>			
	<p>We would also like to highlight that the recast Urban Wastewater Treatment Directive (UWWTD), as proposed, includes requirements for the preparation of Integrated Urban Wastewater Management Plans (IUWWMPs) for all agglomerations above 100,000p.e. and for selected agglomerations between 10,000 and 100,000p.e. based on risk. IUWWMPs must include both wastewater and urban runoff drainage systems and therefore in the context of Ireland they will need to be integrated plans for assets owned by Uisce Éireann (wastewater network) and the Local Authorities (storm water network). The recast UWWTD includes obligations for the reduction of pollution load from both wastewater and storm water systems (Storm Water Overflows (SWOs) and Urban Runoff respectively). If adopted, the new UWWTD will require collaboration between UÉ and LAs on integrated drainage planning. In this regard we welcome the councils commitment to “Develop a surface water drainage plan for Louth for agglomerations greater than 500PE” by 2029, but would highlight however that Uisce Éireann will not have unlimited capacity and would be happy to partner with Louth Co Co on integrated drainage planning on a phased and prioritised basis starting with the larger and more complex drainage agglomerations. We do welcome however future opportunities to collaborate on IUWWMP’s.</p>	Noted.	None	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>IUWWMPs should provide the planning basis for climate resilient cities from a drainage perspective including maximizing the benefit from blue-green infrastructure and adoption of smart innovative solutions.</p>			
	<p><b>Water Demand</b></p> <p>The National Water Resource Plan (NWRP) gives us a framework to understand and address how much and where water is required over time, so that we are ready and flexible whatever the future holds. We are analysing potential climate risk scenarios and embedding our findings into our high-level decision making and assessing the risk to water and wastewater services from climate change and forming plans for climate resilience. UÉ is implementing a Climate Risk and Resilience Assessment project on all its new and existing assets to ensure that the impact of climate change is considered against the performance of our assets during their design lifetime. The outcome of this vulnerability assessment informs climate adaptation plans to ensure that the risk of climate change is mitigated as far as reasonably practical.</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>The NWRP, has a 3-pillar approach of: Lose less, Use Less and Supply Smarter. We aim to Supply Smarter by improving the quality, resilience and security of our supply through infrastructure improvements, operational improvements and development of new sustainable sources of water. We aim to lose less water by reducing the amount of water lost through leakage. In addition, we aim to use less by encouraging everyone to use less water in our everyday lives, improving water efficiency in our homes, businesses, farms and through our own operations. Reducing customer water use will not only reduce the pressure on the public water supply system but will also reduce carbon emissions associated with water treatment and supply. Research from the UK indicates that 6% of the UKs total greenhouse gas emissions are from household water supply and use and 90% of these emissions are from how water is used in the home. This equates to over 2.6 kg CO2e per home per day. A 20% reduction in household water use could lead to a carbon emission reduction of up to 0.45 kg-Co2 per property per day. Reduction in water usage will also result in a reduction of wastewater discharged to the sewer network.</p> <p>Water efficiency should mirror existing efforts related to energy and incorporate but not be limited to reduction in demand, water reuse and location of industry in suitable locals to facilitate process water reuse from one industry to another. We would welcome water use efficiency to be included as an objective/action in the plan. Having a greater water use efficiency of potable water will help achieve carbon emission targets as well as protect the natural resource in some areas which may be vulnerable.</p>			



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p><b>Energy Efficiency</b></p> <p>Energy efficiency improvement is a key sustainability measure to help ensure water and wastewater services are resilient to climate change and for developing a low greenhouse gas (GHG) emitting water and wastewater service. Uisce Éireann accounts for 21% of public sector electricity consumption and is by far the largest consumer of electricity in the public sector. We are therefore focused on improving energy efficiency in asset design, upgrades, lighting and heating, transport and process, as well as on renewables such as PV, wind and biogas, and focusing on reducing demand (Use Less), particularly in the context of the current energy crisis. We have made significant progress on our journey to become an energy efficient, low carbon, sustainable water utility. We have achieved improvements of over 30% in our energy efficiency. We are developing plans to move towards net zero carbon, including further development of renewable energy sources on our assets, delinking energy use from greenhouse gas emissions. We welcome the council's commitments to feasibility studies for district heating.</p> <p>We welcome the Council's commitment to "Examine the potential of maximising district heating opportunities within the DZ and support the implementation of best practice as recommended by SEAI. Raise awareness of the opportunities and benefits presented by district heating".</p> <p>We welcome the opportunity to explore potential collaboration in relation to district heating where heat recovery from the wastewater network and wastewater treatment plants could potentially become a heat source for district heating.</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p><b>Circularity &amp; Bioeconomy</b></p> <p>Circularity and bio-economy initiatives have significant potential in supporting GHG emission reductions. We are progressing numerous initiatives taking a circular economy model for the management of our sludges, as they provide a sustainable source of precious finite materials. The sludge provides an alternative/complement to current raw materials being used. We view our water sludge as a valuable resource, particularly in the context of the circular economy model. From a starting point of nearly 70% of water sludge going to landfill, we have reached a milestone of almost 90% of our water sludge now going to circular economy outlets. In line with a key objective of our National Wastewater Sludge Management Plan, we have implemented Anaerobic Digestion processes at most of our larger sites, which enables energy recovery from biogas. We consider advanced anaerobic digestion followed by reuse of the residual biosolids on land to be the most sustainable solution for wastewater sludge treatment and disposal. Uisce Éireann are eager to collaborate with others in leveraging circularity opportunities to support the development of a sustainable bioeconomy model.</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>
	<p>We request that any development associated with the climate action plan including e.g. renewable energy have due regard for, and not adversely impact, existing, planned or reasonably foreseeable water sources or Uisce Éireann infrastructure. Uisce Éireann will engage via the planning process for such developments in its role as statutory consultee. Developers requiring connections should have regard to available capacity and should engage with UÉ via our New Connections process. Planned public realm and transport projects have the potential to impact on Uisce Éireann assets and projects e.g. tree planting, building over of assets, new connections, stormwater separation, requirement to programme upgrade works in advance of road project.</p>	<p>Noted. The potential effects on material assets have already been considered and mitigated against under the SEA process to date. Environmental Governance Principle 3 for example provides for the protection of the environment, including the material asset environment, during the planning and carrying out of all development supported by defined climate action.</p> <p>Notwithstanding this, it was suggested the Plan provides a more express commitment to not adversely impact Irish Water assets in response to this submission.</p>	<p>None.</p>	<p>None.</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	We would also request that any development in the vicinity of Uisce Éireann assets (including e.g. tree planning) should be in accordance with our Standard Details and Codes of Practise, and Diversion Agreements will be required where an Uisce Éireann asset is diverted or altered. Early engagement in relation to planned projects is requested to ensure public water services and resources are protected, enable Uisce Éireann to plan works accordingly and ultimately minimise disruption to the public.	Further, it was recommended the Council have appropriate regard to this submission when commencing and advancing project level development supported by the defined climate actions.		
Inland Fisheries Ireland	IFI observations on the Draft Climate Action Plan relate, primarily, to the aquatic environment. The watercourses in County Louth contain valuable fisheries habitats, which support a wide variety of fish species from salmonids (Atlantic salmon and trout), pike, coarse fish, lamprey species and European eel among other species. The River Boyne is a designated Special Area of Conservation (Code 02299) with the qualifying interests including Lamprey fluviatilis (River Lamprey) and Salmo salar (Atlantic salmon). This river is also one of the listed rivers in the E.C. (Quality of Salmonid Waters) Regulations 1988 (S.I. 293 of 1988).	Noted.	None.	None.
	It should be noted that while many of the other watercourses in the county are not designated under the Habitats Directive, they support species that are listed in Annex II of the Directive, i.e. Atlantic salmon and Lamprey species.	Noted.	None.	None.
	The watercourses in County Louth not only contribute significantly to the natural heritage of the county, they are also popular angling tourism amenities as well as valuable natural resources, such as a source for treated water supplies or as untreated sources for businesses, agriculture, etc.	Noted.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p><b>Potential impact of climate change on fish and fish habitats</b></p> <p>Climate change is predicted to cause increases in air temperature, heatwaves, dry periods/droughts and heavy precipitation events. The main impacts of climate change on fish species are predicted to be on their distribution, abundance, phenology (timing of important life events such as spawning, migrations, and hatching), species composition and community structure and dynamics.</p> <p>The fisheries habitat's associated impacts are also altered flow regimes, increases in water temperature (and resulting decrease in oxygen concentration) and loss of habitat. Food-webs will also be altered with unpredictable consequences for fish production. Increasing risks of new invasive species and spreading of water borne diseases provide additional concern.</p> <p>Additionally, the effects of existing anthropogenic pressures (e.g., nutrient enrichment, hydro-morphological changes, and invasive species) on freshwater environments and their fish species are likely to interact with climate change associated pressures (e.g., rising temperatures and droughts) and seriously affect freshwater fish species and other aquatic life.</p> <p>Protection of aquatic ecosystems requires that river systems be protected on a catchment basis. The Climate Action Plan must recognise that protection of the aquatic environment/habitat not only requires the protection of water quality but also necessitates the protection and maintenance of physical habitat and hydrological processes/regimes</p>	<p>Noted. It was noted that any significant environmental effects of the CAP have been identified and mitigated against through the SEA and AA processes. The cumulative effects and inter-relationships between environmental components have been considered in this manner. Nonetheless, it was recommended that the local authority considers this comment, as appropriate.</p>	<p>None.</p>	<p>None.</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p><b>Flood Resilience &amp; Nature Based Solutions:</b></p> <p>To ensure that impacts from climate change do not interfere with the aquatic environment, it is essential that those areas adjacent to waterways (riparian buffer zones) are managed in a manner which will lessen impacts to these habitats. A riparian/buffer zone is a vegetated area near a stream, which helps shade and partially protect a stream from the impact of adjacent land uses. It is a discrete ecological and geographical entity. With the decline of many aquatic ecosystems due to development (both urbanisation and agricultural production), riparian buffers have become a common conservation measure aimed at improving water quality, lessening pollution impacts and regulating temperatures.</p>	<p>Climate action defined in the Plan supports the protection and enhancement of biodiversity, including riparian buffer zones and aquatic habitat.</p> <p>It was noted that SEA Monitoring Framework for the LACAP includes the following Plan target:</p> <ul style="list-style-type: none"> <li>• Increase linear metres of riparian corridor enhanced with native planting.</li> </ul> <p>It was recommended the local authority has further regard to these comments during plan implementation.</p>	None.	None.
	<p>Water temperature plays an important role in almost every aspect of fish life and adverse levels of temperature can affect fish behaviour, growth, survival, and disease resistance. Water temperature also has an influence on water chemistry, for example the amount of dissolved oxygen in a waterbody decreases as it gets warmer, and some compounds are more toxic to aquatic life at higher temperatures. This effect will become more impactful as our climate warms and therefore IFI encourages the training of Local Authorities and landowners in sustainable management of our riparian areas.</p>	Noted.	None.	None.
	<p>Climate change influences several of the water-related variables that contribute to floods, such as rainfall. The EPA has reported “Projections indicate a substantial increase in the frequency of heavy precipitation events in Winter and Autumn (Approx. 20%)”. Flood reliance will be needed but must be carried out in a manner sensitive to the aquatic habitat. Flood protection structures such as walls and embankments limits connectivity with the floodplain. If water is no longer able to spill out into floodplains, the volume of water in the channel increases and flood peaks are much greater.</p>	<p>Environmental protection considerations have been appropriately integrated into flood resilience related action defined within the plan.</p> <p>Climate action defined in the Plan supports the protection and enhancement of biodiversity, including riparian buffer zones and aquatic habitat</p>	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
		It was recommended the local authority has further regard to these comments during plan implementation.		
	IFI encourages the use of soft engineering solutions as the way to sensitively increase flood reliance in a river system. Nature based solutions can involve approaches such as bank protection using tree logs, natural water retention and restoring natural river processes. Encouraging meanders in rivers will improve local flow conditions and slows water during high flow conditions	<p>The Plan promotes the use of Nature Based Solutions and Sustainable Drainage Systems as ways to promote flood resilience.</p> <p>It was recommended the local authority has further regard to these comments during plan implementation.</p>	None.	None.
	<p>IFI also encourages the idea of self-rehabilitation of a river system by being “left alone”. By ceasing activities such as channel maintenance, this allows time for the river processes of erosion and deposition to normalise. IFI has published the following guidelines, which can be accessed on our website - “River Restoration Works - Science based Guidance centred on Hydromorphological Principles in an Era of Climate Change – 2020” describes a framework to plan, design, implement and monitor river restoration projects. A list of best practice riparian and instream measures are presented alongside measures to address channel connectivity and invasive species that are compliant with the EU Water Framework Directive (WFD), other EU Directives and State regulations.</p> <p>Daylighting/de-culverting of waterbodies within the county is also considered a natural method of flood management which IFI would fully support. Council commitment to reject proposals that would interfere with natural floodplains would greatly benefit both aquatic and riparian features in the surrounding areas.</p>	<p>Environmental protection considerations have been appropriately integrated into flood resilience related action defined within the plan.</p> <p>Climate action defined in the Plan supports the protection and enhancement of biodiversity, including riparian buffer zones and aquatic habitat.</p> <p>It was recommended the local authority has further regard to these comments during plan implementation.</p>	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Nature-based solutions for the management of rainwater and surface water runoff should be considered from the beginning of the development planning process. Nature Based solutions work with nature (rather than trying to control it) and are now being mainstreamed across the globe. The benefits of taking a nature-based approach includes not just flood risk management benefits, but also improved water quality, biodiversity and climate adaptation and mitigation. In terms of surface water runoff, it is always best to deal with pollutants as close to the source as possible, rather than transferring the pollution elsewhere. Nature-based solutions allows polluted runoff be treated close to where the rain falls and can improve the quality of surface water runoff and decrease runoff volumes. They can also help combat the adverse effects of climate change by reducing temperatures at street level in urban areas and reducing volumes of rainfall-runoff which can aid to alleviate flooding issues.</p> <p>The Department of Housing, local Government and Heritage have recently published an interim guidance document Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document, which should be considered when designing drainage systems. It discusses Water Sensitive Urban Design (WSUD), which is an approach to design that delivers greater harmony between the water cycle, the environment, and communities. IFI should be consulted when resolving local flooding issues incorporating Nature Based Solutions.</p> <p>The Climate Action Plan could consider including incentives and policies to enhance the uptake of Nature Based Solutions in new private developments. The multifunctional asset value of Nature Based Solutions should be laid out and the extent of the benefits provided be quantified to encourage the use.</p>	<p>The Plan promotes the use of Nature Based Solutions as a way to promote flood resilience.</p> <p>It was recommended the local authority has further regard to these comments during plan implementation.</p>	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>IFI have published a revised “Planning for watercourses in the urban environment” which provides guidance on site specific measures to enhance, protect, rehabilitate, or establish riparian and aquatic habitats in urban areas, which can be accessed on IFI’s website. The document encourages the allocation of sufficient set-aside space adjacent to watercourses at planning stage and recommends that this space is planned for at forward planning stage, i.e. County Development Plans and Local Area Plans. While the guidance is primarily aimed at the protecting and enhancing the riparian and aquatic environment from a fisheries perspective it can also play a valuable role in flood management plans</p>	<p>The Plan supports the protection and enhancement of the biodiversity and water environments from development and activities supported by defined climate action.</p> <p>Several Environmental Governance Principles have been defined in the Plan which promote environmental protection and enhancement, including biodiversity conservation and water quality protection and improvement.</p> <p>It was noted that SEA Monitoring Framework for the LACAP includes the following Plan target:</p> <ul style="list-style-type: none"> <li>• Increase linear metres of riparian corridor enhanced with native planting.</li> </ul> <p>It was recommended the local authority has further regard to these comments during plan implementation.</p> <p>As a general note, It was recommended the local authority have appropriate regard to all commentary received from IFI when designing, planning for and delivering site specific projects.</p>	None.	None.
	<p><b>Transport:</b></p> <p>Road Drainage should ensure adequate attenuation measures are in place and silt and petrol interceptors, constructed wetlands and swales should be employed where appropriate to reduce pollutants from the road entering watercourses. Nature based measures can not only manage road run-off in a sustainable manner but can contribute to climate resilience when incorporated into the design. It should be noted that these systems only work when they are properly maintained into the future.</p>	<p>The Plan supports the protection and enhancement of the biodiversity and water environments from development and activities supported by defined climate action.</p> <p>Several Environmental Governance Principles have been defined in the Plan which promote environmental protection and enhancement, including biodiversity conservation and water quality protection and improvement.</p>		



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>In relation to Greenways there is a zone of influence, which should be considered and planned for when promoting active travel. A wildlife corridor system that protects regional diversity should be at the forefront of the planning processes. As stated earlier, riparian areas play a disproportionately large role in filtering out pollutants and sediment from overland surface runoff, flood defence, maintaining biodiversity and for these reasons greenways must not impinge on or degrade the riparian zones. For example, in rural areas where there is more land available, it is better to run a trail just outside the riparian area (perhaps on a topographic bench) and bring it in at strategic places, than to keep it continuously close to a riparian area. Fragmentation can occur along riparian corridors if proper planning is not in place. In considering wildlife, focus should not be solely on the narrow width of the path of the greenway, consider the wider area it may influence such as allowing invasive plant and animal species to spread more easily along the corridor and outcompeting native species</p>	<p>Environmental protection considerations have been appropriately integrated into Green Infrastructure development related action defined in the Plan.</p> <p>The Plan promotes the use of Nature Based Solutions and Sustainable Drainage Systems as ways to promote flood resilience.</p> <p>It was recommended the local authority has further regard to these comments during plan implementation.</p>		
	<p><b>Water Abstraction:</b></p> <p>An on-going challenge for IFI, particularly in summer months when river and stream flows are often low, is wide scale unregulated water abstraction. This practice may have significant ecological implications if large volumes of water are abstracted over a short period of time from small nursery or spawning streams. Such abstractions during dry weather or drought periods could have severe repercussions for aquatic habitats, fish stocks and accordingly the ecological status of watercourses in terms of the Water Framework Directive. IFI's key concern in relation to abstractions is that the sourcing of water supplies from groundwater or surface water resources must not result in a negative impact on the ecology (through hydrological mechanisms, absence of groundwater recharge etc.) of those waters, thereby potentially contravening the range of relevant legislation</p>	<p>The Plan does not define any action directly or indirectly supportive of water abstraction.</p> <p>It was recommended the local authority has appropriate regard to these comments generally.</p>	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	(Fisheries Acts, Habitats Directive, Water Framework Directive etc.). IFI encourages training and information programmes for Local Authorities and landowners regarding sustainable management of watercourses during low flow periods.			



## 2.5 SEA and Plan Modifications

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

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

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

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

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

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

Action	Summary of Modifications
n/a	The text in Section 2, page 14 has been amended to read: "The mission statement should take an action-oriented focus, speaking to the grounded purpose of the local authority in delivering and mainstreaming effective climate action across all services and functions, with voluntary organisations and work in partnership and collaboration with local, national and EU partners to realise the actions of the plan".
3.6	The Tracking Measure for the action has been amended from "At Least 1 example per year" to "At least 2 examples per year".
n/a	Removal of the word "protected" from Table 7-1.



## 3. CONSIDERATION OF ALTERNATIVES

### 3.1 Introduction

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

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

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

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

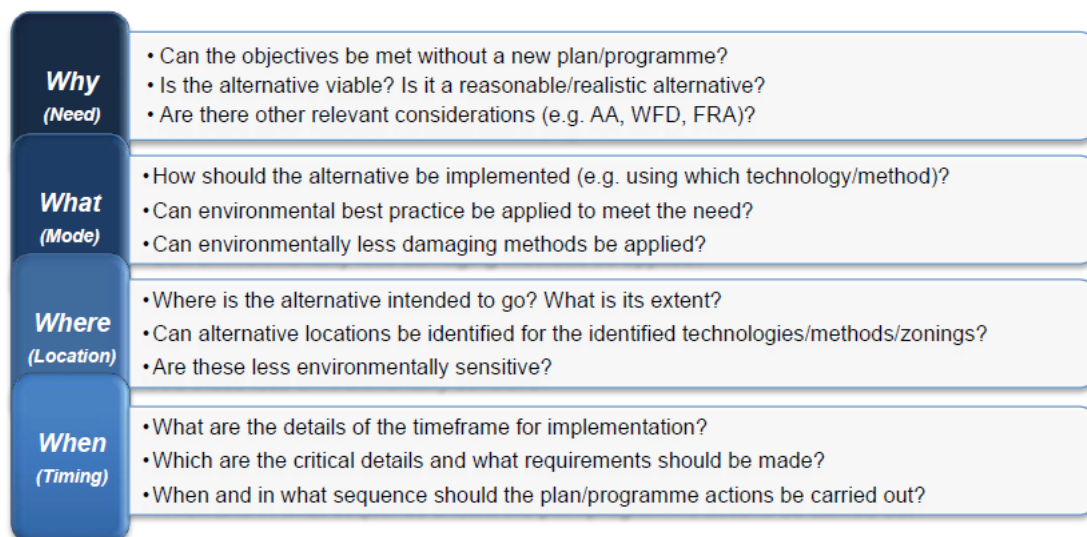
### 3.2 Approach to Developing Reasonable Alternatives

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

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



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



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

### 3.3 Identification and Description of Reasonable Alternatives

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

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



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

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



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

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

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

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

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

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



## 4. SEA CONCLUSION

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

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

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

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



## 5. SEA MONITORING

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

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

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

LCC are responsible for implementation of the SEA monitoring programme. The environmental effects (including positive, negative and cumulative effects) of LACAP implementation will be monitored once every year over the course of the plan's five-year lifetime. This monitoring will be carried out by the Environment and Climate Change section of Louth County Council who will report on progress and performance to the relevant SPC annually. A monitoring report will be prepared to document monitoring outcomes. This report shall be made available for public inspection.

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

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

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



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

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



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

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



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	B3	Support Article 10 of the Habitats Directive with regard to the management of features of the landscape which - by virtue of their linear and continuous structure or their function as stepping stones (designated or not) - are of major importance for wild fauna and flora and essential for the migration, dispersal and genetic exchange of wild species.	<p>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.</p> <p>Linear meters of riparian corridors enhanced with native planting.</p> <p>Fragmentation or breaks in continuity of habitats and loss of wildlife corridors, stepping stones and connectivity (km<sup>2</sup>).</p> <p>Number of developments consented that have significant greenspace proposals.</p>	<p>No adverse impacts on the condition of features of the landscape which - by virtue of their linear and continuous structure or their function as stepping stones (designated or not) - are of major importance for wild fauna and flora as a result of plan implementation.</p> <p>Increase linear metres of riparian corridor enhanced with native planting.</p> <p>Reduce habitat fragmentation or breaks.</p> <p>Increase number of developments consented that have significant greenspace proposals.</p>	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Mapping of LR important habitats and species as part of the County Biodiversity Plan.</p>
	B4	To avoid or minimize significant impacts on semi-natural habitats, species, environmental features, or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed for designation; and to comply with the Wildlife Acts 1976-2012 with regard to listed species.	<p>Condition of semi-natural habitats, species, environmental features or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed for designation.</p> <p>Status of listed species in the Wildlife Acts 1976 - 2012.</p>	<p>No adverse impacts on condition of semi-natural habitats, species, environmental features or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed for designation, as a result of plan implementation.</p> <p>No adverse impacts on listed species in the Wildlife Acts 1976 - 2012 as a result of plan implementation.</p>	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Mapping of LR important habitats and species as part of the County Biodiversity Plan.</p>
	B5	No net contribution to biodiversity losses or deterioration in response to the biodiversity emergency.	<p>Compliance of development supported by the plan with policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the CDP.</p> <p>No. of developments consented that have significant greenspace proposals.</p> <p>Improved biodiversity areas (Area km<sup>2</sup> /length metres).</p>	<p>No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the CDP.</p> <p>Increase number of developments consented that have significant greenspace proposals.</p> <p>Increase quantum of improved biodiversity areas.</p>	<p>Internal monitoring of compliance with CDP Policy Objectives.</p> <p>Internal monitoring of compliance with the County Biodiversity Action Plan.</p> <p>Internal monitoring of likely significant environmental effects of development projects.</p>



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
			Compliance of development supported by the plan with policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the County's Biodiversity Action Plan.	No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the County's Biodiversity Action Plan.  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, including seascape designations	Status of Landscape Character Areas, the Seascape, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects.  Number of developments consented that result in avoidable adverse impacts on Landscape Character Areas, the Seascape, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects, or NI Areas of Outstanding Beauty.  Number of areas in the local authority functional area designated for their landscape character or visual amenity.	All action and development proposals supported by the plan must comply with policy objectives relating to the protection of Landscape Character Areas, the Seascape, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects defined in the CDP.  No development supported by the plan should have an adverse impact on Landscape Character Areas, the Seascape, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects, or NI Areas of Outstanding Beauty.	Internal monitoring of compliance with CDP Policy Objectives.  Internal monitoring of likely significant environmental effects of development projects.  Review of future iterations of the Landscape Character Assessment.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	L2	Avoid or minimise adverse visual effects on residential receptors or other sensitive visual receptors.	Number of developments consented that result in avoidable adverse visual impacts on residential receptors or other sensitive visual receptors.	No development supported by the plan should have a significant adverse visual impact on residential receptors or other sensitive visual receptors.  All development supported by the plan should adhere to relevant Development Management Standards defined in the CDP, in particular standards defined in relation to physical and visual impacts.	Internal monitoring of likely significant environmental effects of development projects.  Review of future iterations of the Landscape Character Assessment.
Cultural Heritage - Archaeology & Architectural	CH1	Avoid impacts upon archaeological heritage (including entries to the Record of Monuments and Places (RMP)) and architectural heritage (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.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
Land Use	LU1	Avoid or minimise effects on existing land use.	Number of instances of significant adverse impacts on existing land use as a result of plan implementation.	No instances of significant adverse impacts on existing land use as a result of plan implementation.	Internal monitoring of likely significant environmental effects of development projects.  Review of Land Use, Land Use Change and Forestry related Greenhouse Gas emissions calculated in the Baseline Emission Inventory.
Air Quality and Noise	AQN1	Increase the number of people travelling to work or school via public transport or by non-mechanical means.	% change in modal split.  Length of new sustainable transport routes developed.	Reduction in private car use.  Extension and improvement of the sustainable transport network in the plan area.	Central Statistics Office (CSO) Population data - Commuting in Ireland.  Internal monitoring of length of new sustainable transport routes developed.
	AQN2	Avoid or minimise effects on local air quality.	Number of developments consented that result in avoidable adverse air quality impacts on sensitive receptors.  Number of exceedances of ambient air quality standards in the County, as monitored under the EPA's National Ambient Air Quality Monitoring Network.  Improvements in air quality status in the county.	No development supported by the plan should have a significant adverse air quality impact on sensitive receptors.  All development supported by the plan should adhere to relevant Development Management Standards defined in the CDP relating to the protection of air quality.  Minimise ambient air quality standard exceedances in the County.	Internal monitoring of likely significant environmental effects of development projects. Consultation with the EPA.  Review of EPA Air Quality Monitoring undertaken in the County.  Review of EPA annual 'Air Quality in Ireland' Report
	AQN3	Avoid or minimise adverse noise impacts.	Number of sensitive receptors exposed to noise nuisance.	No sensitive receptors exposed to nuisance noise in the County.	Internal monitoring of likely significant environmental effects of development projects. Monitoring of internal noise complaint investigations undertaken. Consultation with the EPA and DAERA (where appropriate).
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)	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.'	EPA surface water monitoring data and reports.  EPA bathing water monitoring data and reports.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
			<p>Status of bathing waters as monitored under the Bathing Water Directive.</p> <p>Number of water bodies achieving High or Good Ecological Status as defined by the WFD within the life-cycle of the Climate Action Plan.</p> <p>Status of transitional and coastal water bodies as reported by the EPA Water Monitoring Programme for the Water Framework Directive (WFD).</p> <p>Status of Northern Irish Waters, as reported by DAERA.</p>	<p>No deterioration in the status of any bathing waters, having appropriate regard to bathing water mandatory and guidelines values defined in the Bathing Water Directive.</p> <p>Implementation of the objectives of the second cycle of the national River Basin Management Plan.</p> <p>Increase in number of water bodies achieving High or Good Ecological Status as defined by the WFD within the life-cycle of the Climate Action Plan.</p>	<p>Review of environmental quality data detailed in the EPA Maps Application</p> <p>Review of DAERA water quality data.</p>
	W2	Maintain and/or improve, the chemical and quantitative status of groundwaters.	Status of groundwater bodies as reported by the EPA National Groundwater Monitoring Programme for the WFD.	No deterioration in the status of groundwater quality, having appropriate regard to Groundwater Quality Standards and Threshold Values defined under Directive 2006/118/EC.	EPA groundwater monitoring data and reports. Review of environmental quality data detailed in the EPA Maps Application
	W3	Prevent impact upon the WFD status of surface waters and groundwater in line with the requirements of the WFD.	<p>Number of instances of significant adverse impact on surface water or groundwater bodies resulting in a reduction in water quality or the ability of a water body to achieve 'good' water quality status.</p> <p>Number of surface water bodies achieving High or Good Ecological Status as defined by the WFD within the life-cycle of the Climate Action Plan.</p>	<p>No instances of significant adverse impact on surface water or groundwater bodies resulting in a reduction in water quality or the ability of a water body to achieve 'good' water quality status.</p> <p>Increase in number of water bodies achieving High or Good Ecological Status as defined by the WFD within the life-cycle of the Climate Action Plan.</p>	Internal monitoring of likely significant environmental effects of development projects. Consultation with the EPA and DAERA.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	W4	Comply as appropriate with the provisions of the Flood Risk Management Guidelines.	Number of incompatible developments (supported by the plan) consented within flood risk areas.	Minimise developments (supported by the plan) granted consent on lands which pose - or are likely to pose in the future - a significant flood risk, having appropriate regard to the Flood Risk Management guidelines.	Internal monitoring of development projects granted planning consent.
	W5	Prevent impact upon drinking water quality	Number of non-compliances with Drinking Water Quality Standards defined in the European Union (Drinking Water) Regulations 2023. Number of non-compliances with Water Supply (Water Quality) Regulations (Northern Ireland).	No non-compliances with Drinking Water Quality Standards defined in the European Union (Drinking Water) Regulations 2023. No non-compliances with Water Supply (Water Quality) Regulations (Northern Ireland)	EPA Drinking Water Quality Reports. Review of environmental quality data detailed in the EPA Maps Application. Review of DAERA Drinking Water Inspectorate reports on drinking water quality.
Material Assets	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.	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.	CSO Population data - Commuting in Ireland. Internal monitoring of length of new sustainable transport routes developed.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
			Total Area of road reallocated for sustainable alternatives (m <sup>2</sup> ).	Increase number of Electric Vehicle charging points in the county. Increase Total Area of road reallocated for sustainable alternatives.	
	MAI4	Promote sustainable waste management.	Tonnes of hazardous waste received at Council Waste Management Facilities annually. Tonnes of W.E.E.E. waste received at Council Waste Management Facilities annually. Tonnes of Bulky waste received at Council Waste Management Facilities annually. Tonnes of garden waste received at Council Waste Management Facilities annually.	Increase waste recycling in the County. Reduce waste generation in the County.	EPA Waste Statistics. Consultation with the EPA.
	MAI5	Promote sustainable water use and drainage management.	Level of water use in the County. Compliance with Sustainable Drainage System (SuDS) related development management standards defined in the CDP.	Reduced water use in the county. All development (supported by the plan) must comply with SuDS related development management standards defined in the CDP.	CSO water consumption data. Internal monitoring of flood risk associated with development projects and development project compliance with relevant flood risk and management related development management standards.
Tourism & Recreation	TR1	Avoid or minimise effects upon tourism and recreation amenities.	Visitor trips to local authority functional area	Stable or increasing number of visitor trips to local authority functional area	Fáilte Ireland Data on Tourism Performance
Climate Change	CF1	Delivery of the necessary action to support the national target of 80% electricity from renewable sources by 2030.	Level of Greenhouse Gas (GHG) emissions in the County. Level of renewable energy infrastructure in the County.	Reduce GHG emissions associated with the Energy sector in the County. Increase the level of renewable energy infrastructure in the County.	EPA National Emission Inventory. Baseline Emission Inventory for the County. Megawatt hour (MWh) output from renewable energy infrastructure in the county.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	CF2	Actively support the delivery of all national climate policy as appropriate to the county with the prioritisation and acceleration of evidence-based measures.	Level of GHG emissions in the County	Reduce GHG emissions for all sectors in the County.	EPA National Emission Inventory. Baseline Emission Inventory for the County.
	CF3	Assist in the delivery of the climate neutrality objective at local and community levels.	Level of GHG emissions in the County. Level of GHG emissions in the Decarbonising Zone. Net addition of tree cover added.	Reduce GHG emission in the County to Net Zero. Reduce Decarbonising Zone GHG emissions to Net Zero. Increase level of tree cover in the County.	EPA National Emission Inventory. Baseline Emission Inventory for the County. Baseline Emission Inventory for the Decarbonising Zone.
	CF4	Deliver a Decarbonising Zone (DZ) within the local authority area to act as a test bed for a range of climate mitigation and adaptation measures in a specifically defined area through the identification of 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 planning consents.



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