



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:**  
Dublin City Council



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Dublin City Council

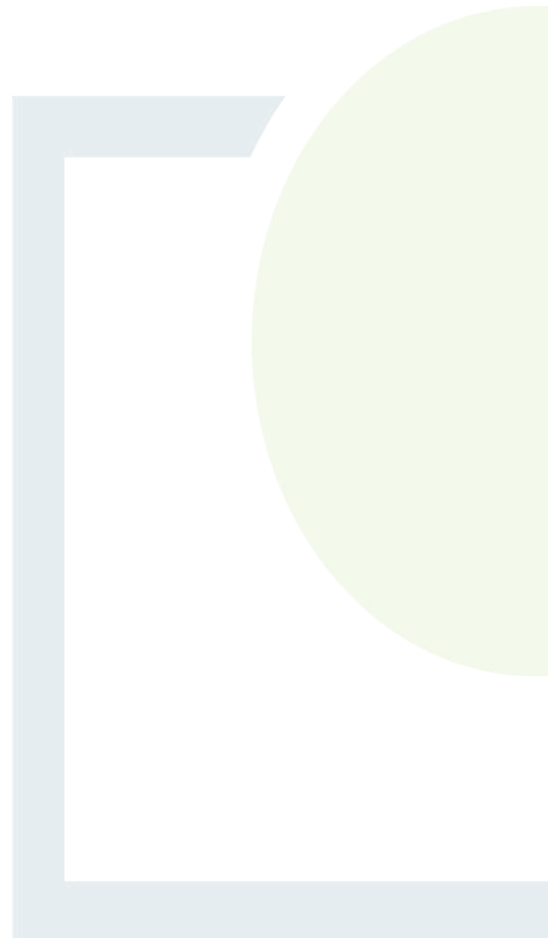
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# Strategic Environmental Assessment Statement

## 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 Dublin City Local Authority Climate Action Plan to Dublin City 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

Dublin City Council (DCC) have adopted the Dublin City 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 plan, 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?
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	<p>Background information on the Geological Survey of Ireland was provided initially in this submission. An overview of county level geoheritage and groundwater assets and databases were provided. Information was provided on geological, geotechnical, geothermal, natural resources, geochemistry and geophysical data sources. Specific advice on geological/hydrogeological considerations that need to be take into account during the making of the Plan was provided, as follows:</p> <ol style="list-style-type: none"> <li>1. Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general.</li> <li>2. Geohazards should be considered during the Plan-making and development processes.</li> </ol>	<p>Appropriate regard was had to these baseline geological and hydrogeological data sources and considerations during the preparation of the SEA Environmental Report for the LACAP.</p>





Environmental Authority	Summary on the Scoping Consultation Submission	How was this submission taken into account during the SEA?
	<p>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.</p>	
<p>Department of Housing, Local Government and Heritage</p>	<p>The Department advised on additional flora present within the Plan area subject to Flora Protection Orders which were not referenced in the initial SEA Scoping Report.</p> <p>The Department welcomed the proposal to carefully examine the impacts of linear projects on biodiversity. It noted the possibility that linear projects in existence such as the Grand Canal, Royal Canal and Dodder Greenways may have had adverse impacts on biodiversity.</p> <p>It noted the effects artificial lighting associated with linear projects can have on fauna species.</p> <p>The potential impact of coastal flood defence works on biodiversity.</p> <p>The potential impact of any expansion of electricity transmission infrastructure for energy supply from renewable sources on biodiversity.</p>	<p>Baseline biodiversity information was reviewed, clarified and updated as necessary during the finalization of the SEA Environmental Report, having appropriate regard to the Department's commentary in relation to flora subject to Flora Protection Orders in the Plan area.</p> <p>All advice with respect to the potential impacts of the LACAP was considered during the environmental assessment process. The need to assess and mitigate the effects of linear infrastructure supported by the Plan was one aspect that underpinned the SEA (and AA).</p> <p>Appropriate mitigation was defined to ensure potential effects of public lighting associated with or supported by Plan action are appropriately managed and mitigated. For example, the following environmental mitigation text was added to Action R3.</p> <ul style="list-style-type: none"> <li>• <i>'Public Lighting Upgrades will prioritise energy efficient systems while ensuring the lumen levels and spectral range are maintained or reduced/controlled to avoid effects to biodiversity.'</i></li> </ul> <p>All advice in relation to the management of biodiversity when planning renewable energy related projects was considered which served to shape the renewable energy development related mitigation measures defined under the SEA and AA, including the Environmental Governance Principles.</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
R1	<b>Social Housing Regeneration:</b> We are the largest landlord in the country, with a stock of 214 flat complexes and 10,000 houses, this is an opportunity to demonstrate and set the standard for sustainable living. We will build on our experience with energy retrofitting to prepare our housing for climate change. Our flagship project will be Dominick Street Lower. This project will demonstrate climate resilient housing retrofit that enables and encourages residents to live sustainably with ease through the provision of, for example: green spaces to grow, play and create; shared spaces to meet and innovate; segregated waste facilities, renewable energy generation (solar PV, geothermal and micro wind generation where feasible), and mobility options (shared bikes, micro mobility and EV charging).	Attach the following text to the action: 'All social housing regenerations projects will have due regard to protected species such as Annex IV species and where appropriate bat roost surveys will be undertaken to inform such works. All regeneration projects will have due regard to the need to appropriately protect, conserve and enhance protected structures in accordance with protected structures legislation.'
R2	<b>Public Buildings Regeneration:</b> Our social housing will serve as the exemplar for domestic buildings, our public buildings will demonstrate how heritage buildings can be adapted and retrofitted for a climate resilient future. As with our social housing, our buildings – 2 galleries, 22 libraries, 12 community centres, 17 sports and recreation centres, and operations depots – will demonstrate what is possible.	Attach the following text to the action: 'All retrofitting and maintenance works will prioritise energy efficiencies, segregated waste facilities, renewable energy generation (solar PV, geothermal and micro wind generation where feasible), and mobility options (shared bikes, micro mobility and EV charging); having due regard to environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value etc.'
R3	<b>Climate Resilient Critical Infrastructure:</b> The city's infrastructure that enables us to live, work and play needs to be resilient. Ensuring that our drainage system, utilities, roads, public lighting and communications networks are maintained and upgraded is essential. This requires working in partnership with Irish Water, the OPW, ESB, Eirgrid, NTA, and DECC. Together we will ensure that these critical systems are prepared for the future. Our flagship energy project, the Dublin District Heating System (DDHS) will contribute to our energy security by providing an alternative to electricity based heating systems. This will be further supported by geothermal. DCC is also facilitating the delivery of public electric vehicle charging infrastructure in collaboration with key partners including ZEV and ESB Networks.	Attach the following text to the action: 'Public Lighting Upgrades will prioritise energy efficient systems while ensuring the lumen levels and spectral range are maintained or reduced/controlled to avoid effects to biodiversity. All infrastructure projects under this action will have due regard to environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value etc.'
RF1	<b>A Nature Full City:</b> Nature provides us with resources to live and thrive. Delivering on our parks and greening strategies will increase the green cover of the city and improve air quality, water quality, and health and well-being. Prioritising green infrastructure that connects existing parks will not only improve the look and atmosphere of our streets making your commute more enjoyable, but will also provide pollinators, birds, and other animals with food and places to live. Ensure connectivity projects priorities ecological connectivity through complex hedgerow development and maintenance, while ensuring barrier effects such as inappropriate lighting are avoided. Providing the public with the opportunity to learn about biodiversity is essential to ensuring that the nature based solutions we implement thrive.	Attach the following text to the action: 'Natural heritage education will focus on challenging environmental perceptions to foster environmental stewardship through appropriately managed engagement with nature. All infrastructure projects under this action will have due regard to environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value.'



LACAP Action Reference	LACAP Action	Mitigation Measure
	The Dublin Bay UNESCO Biosphere Discovery Centre and the Liffey Vale Biodiversity Centre, will provide people with the opportunity to learn about our natural heritage and how we can all take steps to conserve our environment.	Furthermore, works ensure appropriate bat roost investigation surveys and appropriate measures taken to ensure no significant impacts occur to any Annex IV species. '
RF2	<b>Restoring the City's Rivers:</b> Growing around the River Liffey and its tributaries, residents of the city flourished, harvesting vegetables in the hinterlands, trading livestock at marts in the city, and bringing spices in from the port. Our city's rivers and canals have defined Dublin. Their restoration plays a vital role in the city's future. In our development plan we have committed to de-culverting and giving our vital rivers space. Measures will also see our rivers provide people with places for recreation and connection with nature. Our restoration plans for the River Santry demonstrate what is possible, and we will re-imagine how we celebrate the River Liffey.	Attach the following text to the action: 'All recreational activities being promoted or developed under the action will have due regard to all environmental constraints such as Biodiversity and European sites, where required appropriate visitor management plans and appropriate signage will be developed to ensure appropriate management processes are put in place to avoid significant adverse effects. Similarly, infrastructure works will have integrated environmental considerations within the feasibility assessment.'
RF3	<b>Re-Use of Buildings:</b> We know that the lowest carbon building is one that is already built. Re-using existing buildings provides an opportunity to build on existing programmes, for example adaptive re-use which is converting vacant commercial buildings into housing. This also aligns with the EU Performance of Buildings Directive. We will also use vacant buildings to support enterprises by identifying buildings suitable for incubation hubs and community spaces.	Attach the following text to the action: 'All reuse projects will have due regard to the need to appropriately protect, conserve and enhance protected structures in accordance with protected structures legislation.'
C3	<b>Innovation Districts:</b> Our Smart City programme is developing innovation districts that bring together diverse SMEs to create solutions that improve the city. Smart Districts are strategically selected locations across Dublin where innovation projects are fast-tracked. Smart Districts are designed in partnership with citizens, industry, and academia. Each Smart District is unique, with projects designed to meet the specific needs of those who live and work there.	Attach the following text to the action: 'Having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity, and the need to appropriately protect and conserve protected structures.'
C4	<b>Decarbonisation Zones:</b> We will build on this knowledge and experience gained from our smart districts, and develop our two decarbonisation zones in Ringsend and Poolbeg, and Ballymun. The development of the decarbonisation plans for Ringsend and Poolbeg, and Ballymun, will be a collaborative effort to ensure that the unique strengths of each zone come to the fore and permits ownership of the challenges and solutions.	Attach the following text to the action: 'Having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity, and the need to appropriately protect and conserve protected structures.'
S1	<b>A Connected Active Travel Network:</b> Moving people through the city to meet friends and family, to go to work or school, or to simply explore must be easy and safe. We will bring together 95% of the population of the City within 400 metres of the active travel network; making it easier for people to walk, cycle, wheel or scoot to their destination or for leisure, day or night.	Attach the following text to the action: 'Community Participation Events to celebrate new active travel routes as they open and encourage use in a responsible manner to avoid/minimise impacts to biodiversity and the environment. Ecological connectivity will be considered with regard to hedgerow development and maintenance as well as the avoidance of barrier effects such as inappropriate lighting. All active travel projects will have due regard to environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value etc.'



LACAP Action Reference	LACAP Action	Mitigation Measure
S2	<b>Neighbourhoods are the Heart:</b> Dublin is said to be a city of villages and these villages have strong identities. This is a strength. Nurturing our neighbourhoods to ensure that they continue to thrive and support strong social networks is vital in preparing for climate change and preventing adverse impacts on our health and well-being, during and in the aftermath of an extreme event. We will build on our existing initiatives such as quiet zones and sustainable energy communities, pride of place, and tidy towns to increase our social, and economic resilience.	Attach the following text to the action: <b>'A focus shall be placed on integrating climate action with considerations relating to pollinator friendly biodiversity to ensure a win-win scenario are achieved.'</b>
S4	<b>A Re-imagined Public Realm:</b> Public squares and the spaces in between are where life's stories are born. In a time of climate change our public realm has a lot to do. Not only will public spaces need to bring people together to play, chat, and create, they must be resilient to climate change impacts – providing shade as temperatures rise and water storage when the rainfall is intense or absent. Aligning our plans for a vibrant night time economy, providing public lighting, street furniture, waste segregation, active travel and greening will be a critical part of re-imagining public spaces that define our city.	Attach the following text to the action: <b>'All lighting projects will have low lumens directional lighting designed with regard to ecological sensitivities. All works will due regard to environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value etc.'</b>
OS10	Monitor implementation of flood risk management guidelines in planning applications.	Attach the following text to the action: <b>'having due regard for environmental sensitivities such as European sites, Biodiversity, Archaeology and amenity value etc.'</b>
OS11	Coordinate Emergency Response Plans aligned with Sendai Framework and revise based on learnings from management of response to events.	Attach the following text to the action: <b>'having due regard for environmental sensitivities such as European sites, Biodiversity, Archaeology and amenity value etc.'</b>
OS13	Environmental surveys of all City rivers and estuaries as baseline surveys from which to monitor ecosystem health.	Reword the action to the following: <b>'Develop and complete environmental surveys of all City rivers and estuaries as baseline surveys from which to monitor ecosystem health.'</b>
OS17	Identify opportunities of introducing circular economy principles in Bring Centre Depots.	Attach the following text to the action: <b>'and implement where appropriate.'</b>
OS18	Expand Depot collection of WEEE products to all Depots.	Attach the following text to the action: <b>'whilst ensuring such sites are operated in accordance with the requirements of the Waste Management Act and in a manner that does not result in environmental nuisance or pollution.'</b>
OS21	Review terms and conditions for all events approved by DCC to incorporate possible sustainability conditions.	Attach the following text to the action: <b>'and integrated considerations for biodiversity and other environmental sensitivities.'</b>
OS22	Develop strategy to convert fleet to low emission vehicles; and ensure end of life plans are in place for vehicles.	Reword the action to the following: <b>'Develop strategy to convert fleet to low emission vehicles based on sustainable energy/fuel sources; and ensure end of life plans are in place for vehicles.'</b>



LACAP Action Reference	LACAP Action	Mitigation Measure
EP8	The Council will work with the Local Authority Waters Programme in its support of communities and stakeholders in the delivery of local water quality projects and initiatives.	Attach the following text to the action: <i>'have due regard for environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value etc.'</i>
EP19	Support and promote Tidy Towns / City Neighbourhoods initiatives.	Attach the following text to the action: <i>'which have due regard for environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value etc.'</i>
EP28	Build partnerships with cities internationally to exchange best practice for climate action.	Attach the following text to the action: <i>'and implement learnings into all future plans and projects.'</i>
EP32	Promote and encourage community involvement in the retrofit of SuDS in existing developments.	Attach the following text to the action: <i>'having due regard to environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value etc.'</i>



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

Promote climate action projects that support and maximize environmental co-benefits, such as biodiversity protection and enhancement; improved air, water or soil quality; or enhanced recreation, amenity and cultural heritage value, to ensure win-win benefits are gained.
Support or facilitate climate action related projects and initiatives which seek to make improvements in soil structure, management and health by increasing soil organic carbon - which will create the environmental co-benefits of improving flood resilience by enhancing water holding capacity of soils and increasing the level of GHG sequestration associated with land use functions.
Ensure all development underpinned or supported by climate action is planned and implemented in a manner that appropriately considers the potential for environmental co-benefits, potential environmental impacts and environmental protection requirements. No climate action related development project that is likely to have a significant negative effect on the receiving environment shall be supported.
Flood and coastal defence projects, or related maintenance works, shall be carried out in a manner that promotes climate action-biodiversity related co-benefits, and shall have due regard for the protection and enhancement of rare, protected or important habitats and species.
Ensure climate action related projects are carried out in a manner that promotes climate action-cultural heritage co-benefits, and do not result in unauthorized physical damage to cultural, archaeological or architectural features, or unauthorized or inappropriate alteration of the context of sensitive cultural heritage features.
Ensure climate action related projects are carried out in a manner that promotes climate action water quality co-benefits and align with the provisions of the Water Framework Directive and relevant River Basin Management Plan.
Promote climate action projects that support protected trees, hedgerows and other habitats such as wetlands, flood zones which contribute to green infrastructure.
Support opportunities to improve ecological connectivity of non-designated habitats and sites to improve overall ecosystem resilience and functioning while supporting climate action within the city.

**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
Cian O'Mahony SEA Section Office of Radiation Protection and Environmental Monitoring Environmental Protection Agency	The SEA should also assist in identifying ways to maximise the potential co-benefits of climate-related measures for air quality, human health, biodiversity, water quality and other interrelated areas (i.e. win-win solutions).	Noted and agreed. It was noted that the SEA Environmental Report (ER) had defined Environmental Governance Principles and action amendment suggestions to ensure climate action co-benefit opportunities are maximized. Various defined mitigation measures serve to promote win-win solutions.	None.	None.
	We recommend that the findings of the SEA ER and NIS are fully reflected in the Plan, to ensure that the relevant recommendations are fully considered and integrated as appropriate.	Noted and agreed. Environmental mitigation measures in the form of Environmental Governance Principles and climate action amendment suggestions were fully integrated into the Plan itself.	None	None
	<p><b>Environmental Authorities</b> Under the SEA Regulations, you should consult with:</p> <ul style="list-style-type: none"> <li>• Environmental Protection Agency;</li> <li>• Minister for Housing, Local Government and Heritage;</li> <li>• Minister for Environment, Climate and Communications</li> <li>• Minister for Agriculture, Food and the Marine.</li> </ul> <p>If you have any queries or need further information in relation to this submission, please contact me directly at <a href="mailto:c.omahony@epa.ie">c.omahony@epa.ie</a>. I would be grateful if you could send an email confirming receipt of this submission to: <a href="mailto:sea@epa.ie">sea@epa.ie</a>.</p>	<p>Noted. All listed Environmental Authorities were consulted with as part of the SEA process.</p> <p>It was recommended the Council confirm receipt of this submission with Cian O' Mahony, if this hadn't been done already.</p>	None	None
	<p><b>Non-Technical Summary</b></p> <p>You should ensure that the Non-Technical Summary includes the relevant information as required under Schedule 2 of S.I No. 434 Of 2004, as amended.</p>	<p>It was assumed that SI No. 434 is a typo and SI No. 435 was what was intended to be addressed with this statement.</p> <p>The requirements of Schedule 2 of SI No 435 were noted and amendments to the NTS were made as appropriate.</p>	None	Updated the NTS to reflect the relevant information as required under Schedule 2 of SI No 435 of 2004 as amended.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Relationship with other plans and programmes</p> <p>We acknowledge that the Plan has been prepared taking account of the key National plans including the National Climate Action Plan 2023. We also acknowledge that the Plan sets out the key plans, programmes and policies considered in preparing the SEA.</p> <p>The Plan should include a commitment to remain aligned with high level plans and programmes, Guidelines, and legislation over its lifetime. The Climate Action Plan 2024 is currently being prepared and work will be commencing on the review of the National Planning Framework and Regional Spatial and Economic Strategies also. Any relevant updates of these plans/strategies should be integrated as appropriate into the Plan as relevant and appropriate.</p> <p>The Plan should include a commitment to consider any relevant updated actions, measures or recommendations that may arise in updates to the National Climate Action Plan (or the National Planning Framework) over the lifetime of the Plan.</p>	<p>Noted and agreed. It was noted that this was in reference to the LACAP and not the SEA ER or AA NIR documentation.</p> <p>It was recommended the Council includes a commitment in the Plan to remain aligned with high level plans and programmes if this wasn't the case already.</p> <p>It was recommended the plan includes a commitment in the Plan to consider and appropriately integrate relevant updates to the national Climate Action Plan and National Planning Framework over the lifetime of the Plan.</p>	None	None
	<p><b>Strategic Environmental Objectives</b></p> <p>We recommend that in considering strategic environmental objectives, they should where possible reflect the plan being prepared, rather than use more generic environmental objectives. This will help both in considering more specific monitoring and mitigation measures, when required.</p>	Noted. The Strategic Environmental Objectives defined were very specifically defined to reflect the themes, goals, objectives and climate action contained in the plan and in light of the potential environmental effects associated with Plan implementation.	None	None
	<p><b>Alternatives</b></p> <p>We note the alternatives considered in the SEA and acknowledge the preferred option selected.</p>	Noted.	None	None.
	<p><b>Mitigation Measures</b></p> <p>Where the potential for likely significant effects has been identified, you should provide appropriate mitigation measures to avoid or minimise these. You should also ensure that the Plan includes clear</p>	<p>The SEA produced recommended a suite of mitigation measures in response to climate actions considered to have potentially significant environmental effects.</p> <p>Environmental Governance Principles were defined for the purpose of underpinning and framing the defined</p>	None	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>commitments to implement the relevant mitigation measures.</p>	<p>climate actions. All activities and development supported by the defined climate actions shall be undertaken or influenced by the local authority, as appropriate, in accordance with these Environmental Governance Principles.</p> <p>Mitigation was also achieved by the integration of environmental considerations into the defined LACAP climate actions.</p> <p>These mitigation measures were wholly integrated into the LACAPs.</p> <p>Section 8 of the SEA ER provides full detail of these environmental mitigation measures.</p> <p>It was recommended the Plan provides a clear commitment to implement these mitigation measures, if this isn't the case already.</p>		
	<p><b>Monitoring, Implementation &amp; Reporting</b></p> <p>The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities.</p> <p>If the monitoring identifies adverse impacts during the implementation of the Plan, then you should ensure that suitable and effective remedial action is taken.</p> <p>Guidance on SEA-related monitoring is available on the EPA website at <a href="https://www.epa.ie/AboutEPA/Information/SEA-Statements-and-Monitoring-Report.pdf">06695-EPA-SEA-Statements-and-Monitoring-Report.pdf</a></p>	<p>The SEA Monitoring Programme established for the LACAP is contained in the SEA ER. This monitoring programme was developed in accordance with EPA guidelines entitled 'Guidance on SEA Statements and Monitoring' (2020).</p> <p>The monitoring programme is multi-faceted, broad in scope and was designed to allow for a flexible and adaptive approach to SEA monitoring during Plan implementation.</p> <p>The monitoring programme was designed to inherently measure cumulative effects that may arise due to the implementation of the Plan.</p> <p>This plan considers both positive and negative effects, as per the following statement from the SEA text:</p> <p><i>'Where monitoring identifies that the implementation of the LACAP is having a significant negative environmental effect, an in-depth review of the LACAP should take place and the LACAP should be updated in a manner that satisfactorily mitigates these environmental effects (i.e., through the adoption of additional environmental</i></p>	<p>None</p>	<p>Updated the SEA monitoring programme to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects arising due to plan implementation, where appropriate.</p> <p>Provided additional detail on monitoring programme data sources.</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
		<p><i>mitigation measures. Similarly, where monitoring indicates that potential positive environmental effects associated with LACAP implementation are not being adequately realized, the LACAP should be reviewed and updated in a manner that supports the realization of all potential positive environmental effects, having regard to the overall vision and high-level objectives of the plan.'</i></p> <p>It was noted however that additional opportunities exist in relation to monitoring the positive environmental effects of defined climate action – in connection with SEOs PHH1, L1, AQN2, TR1. The SEA monitoring programme was updated to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects arising due to plan implementation, where appropriate.</p> <p>The monitoring programme includes detail on the indicators, targets and data sources to be used to monitor and measure progress. Some additional detail on data sources has however been provided to better guide the SEA monitoring to be carried out across plan implementation.</p> <p>A commitment to remedial action in the event SEA monitoring shows the implementation of the Plan is having adverse environmental effects was made in the SEA.</p>		
	<p><b>EPA State of the Environment Report</b></p> <p>Our State of Environment Report, Ireland’s Environment - An Integrated Assessment 2020 (SOER2020) identifies thirteen ‘Key Messages for Ireland’. Delivering Ireland’s long-term sustainable development and environmental objectives will involve many different stakeholders to address these key actions. The report recognises the need for full implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies.</p>	<p>Noted.</p> <p>It was recommended the Council make a commitment to take account of any relevant recommendations in the SOER 2024 report, once published, in implementing the Plan over its lifetime.</p>	None	None



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	The EPA are currently preparing the next iteration of the SOER report, which will be published in 2024. We recommend that a commitment is made in the Plan, to take account of any relevant recommendations in the SOER 2024 report, once published, in implementing the Plan over its lifetime.			
	<p><b>SEA Statement – “Information on the Decision”</b></p> <p>Once the Plan is adopted, you should prepare an SEA Statement that summarises:</p> <ul style="list-style-type: none"> <li>• How environmental considerations have been integrated into the Plan;</li> <li>• How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;</li> <li>• The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,</li> <li>• The measures decided upon to monitor the significant environmental effects of implementation of the Plan.</li> </ul> <p>You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.</p>	Noted. An SEA statement is produced and circulated to any environmental authority consulted during the SEA process.	None	None
	<p><b>Future Amendments to the Plan</b></p> <p>You should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan</p>	Noted.	None	None
Edel Griffin, Development Applications Unit, Department of Housing, Local Government and Heritage	In the Natura Impact Statement prepared in relation to the Draft CAP it is stated with regards to the proposed construction of the Discovery Centre “The proposed location of this Dublin Bay UNESCO Biosphere Discovery Centre is within protected habitats such as Marram Dunes. The construction phase elements of this project are likely to have significant impacts on the receiving environment if incorrectly designed and managed.	Noted.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
Planning Ref: FP2023-115 (Please quote in all related correspondence)	There should be no external lighting around this structure. Moreover, it is well documented that bull Island and the protected habitats are under severe threat from visitor movements and associated damage. There is a clear need for improved management processes. A visitor management plan for the centre and surrounding environs is required to minimise operational phase impacts. Actions OS25 and EP32 address these issues in a robust manner.” These comments are repeated in a section of the Strategic Environmental Assessment (SEA) considering the construction of the Discovery Centre. In fact the proposed location of the centre on Bull Island is on the site of an old dump, but these document’s remarks with regards to visitor movements are well founded.			
	CAP Action OS25 states “Implement the North Bull Island Management Plan” and Action EP 32 “Promote and encourage community involvement in the retrofit of SuDS in existing developments; having due regard to environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value etc.” It is not clear what relevance the latter action has with regards to Discovery Centre. With regards to Action OS25 it is not clear either whether the North Bull Island Management Plan referred to is the Draft Management of North Bull Island Nature Reserve plan published by Dublin city Council in 2020 or the Visitor Access Management Plan for North Bull Island published by the Council in April of this year.	Noted It was recommended the local authority consider clarifying these matters, as appropriate.		Updated the NIR to reflect the comments made.  Omitted reference to EP32 in reference to the Dublin Bay UNESCO Biosphere Discovery Centre.
	In any case, even if both these plans were implemented in full, the Department is not confident that if the provision of the Discovery Centre were to attract more visitors to Bull Island that there might not be increased adverse effects on QI habitats on the island as a result of higher human footfalls and possibly increased disturbance of QI or Special Conservation Interest birds species for the North Bull Island SPA as well.	The high-level environmental implications of Action 1.2 were adequately assessed and mitigated against under SEA and AA processes to date.  The following Integrated Environmental Consideration defined in the Plan will, at policy level, serve to support the carrying out of Dublin Bay UNESCO Biosphere		



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Undoubtedly much more detailed survey work on the existing on-going effects of visitors on the QI habitats and species on Bull Island, and analysis of the potential numbers of visitors likely to be attracted there by the Discovery Centre and their possible effects on QIs, would have to be undertaken to allow full Appropriate Assessment (AA) of the potential effects of the construction and operation of the Centre on the integrity of the North Dublin Bay SAC and North Bull Island SPA, before any approval for the Discovery Centre's construction could be granted. AA would have to be carried out for such a proposed project, as recognised by the documentation prepared in relation to the Draft CAP, whether the Action RF1.2 to provide the Biosphere Discovery Centre is included in this draft plan or not. But given the doubts as to the viability of providing the proposed Discovery Centre on account of the possibility of it having adverse effects on the European sites in which the North Bull is located, as outlined above, and the failure of Action RF1.2 in relation to the provision of the Discovery Centre to directly address any causes of or adaptations to climate change, the Department recommends the latter action should be omitted from the finalised Dublin City CAP 2024-2029 to be adopted by the City Council.</p>	<p>Discovery Centre project in a manner that does not result in adverse effects on biodiversity or European sites:</p> <p><i>'Natural heritage education will focus on challenging environmental perceptions to foster environmental stewardship through appropriately managed engagement with nature. All infrastructure projects under this action will have due regard to environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value etc. Furthermore, works ensure appropriate bat roost investigation surveys and appropriate measures taken to ensure no significant impacts occur to any Annex IV species.'</i></p> <p>Furthermore, there are several Environmental Governance Principles (EGPs) defined in the Plan which will serve to prevent adverse effects associated with the centre, if adhered to. EGP3 for examples states the following:</p> <p><i>'Ensure all development underpinned or supported by climate action is planned and implemented in a manner that appropriately considers the potential for environmental co-benefits, potential environmental impacts and environmental protection requirements. No climate action related development project that is likely to have a significant negative effect on the receiving environment shall be supported.'</i></p> <p>At policy level, the Plan supports the environmentally appropriate and sustainable development of the Dublin Bay UNESCO Biosphere Discovery Centre at North Bull Island.</p> <p>It was more appropriate to assess and appraise the specific environmental effects of the Dublin Bay UNESCO Biosphere Discovery Centre as a development project during the relevant planning consent process.</p> <p>It was recommended the local authority consider this commentary further, as necessary.</p>		



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>In the Department’s submission to Dublin City Council in August of this year in relation to the Scoping of the SEA for the Draft Dublin City CAP, corrections were suggested as to the occurrence of species of protected plants within the Dublin City Council administrative area as set out in Table 3.1 ‘Designated Ecological sites and Protected Species’ included in Section 3.3 Biodiversity, Flora and Fauna of the SEA Scoping Report. It is noted the inaccuracies in the above table have not been corrected in the corresponding table in the SEA Environmental Report prepared in relation to the Draft CAP. This submission of the Department’s is not included in Appendix 2 Consultation Feedback to the SEA Report published by the Council, which only includes a submission from the Environmental Protection Agency in relation to the Scoping of the SEA. The Department recommends that Table 3.1 of the SEA Environmental Report should be modified to include the corrections previously suggested by the Department and that the Department’s original submission concerning the Scoping of the SEA of the CAP should be published by Dublin City Council in an expanded Appendix 2 to the SEA Environmental Report.</p>	<p>Noted. The SEA Environmental Report was updated appropriately.</p>	<p>No</p>	<p>Updated Section 4.3.1/Table 4-1 of the SEA ER to include appropriate detail on species of protected plants within the Dublin City Council administrative area.</p>
	<p><b>Archaeology</b>            The Department of Housing, Local Government and Heritage welcomes the publication of local authority draft Climate Change Adaptation Strategy. The Department draws your attention to the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) prepared as part of the National Adaptation Framework. The Climate Change Sectoral Adaptation Plan (CCSAP) identifies the priority impacts for the built and archaeological heritage based on current climate change projections.</p>	<p>Noted.</p>	<p>Reference was made to the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) in Section 3.4 - <i>In-combination effects with Other Plans and Programmes</i>, and Appendix 2 - <i>Relationship with other plans and programmes</i>, as appropriate.</p>	<p>Reference was made to the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) in Section 7.3 - <i>Potential Cumulative Effect of the Draft LACAP in combination with other Plans and Projects</i>, and</p>





Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
				Appendix 1 - Relationship of the Plan with other relevant Plans and Programmes, as appropriate.
	The Heritage Division of the Department (National Monuments Service and National Built Heritage Service) 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.	Noted.	None.	None.
	In the preparation and implementation of the local authority adaptation strategy, there are a number of issues regarding protection of built and archaeological heritage that the Department recommends be taken into account to identify the heritage assets at risk in its area, assess their vulnerability to climate change, increase their resilience and develop disaster risk reduction policies for direct and indirect risks. For example, it is recommended that the strategies should consider:	Noted	None.	None.
	Identifying the built and archaeological heritage assets in the local authority area including, but not restricted to, structures and sites subject to statutory protection under the National Monuments Acts 1930 to 2014, or the Planning and Development Acts.	The SEA scoping report and SEA Environmental Report identified the built and archaeological heritage assets in the LA including structures and sites subject to statutory protection under the National Monuments Acts 1930 to 2014, and the Planning and Development Act (as amended). Exhaustive detail on built and archaeological heritage is held on record by the local authority and provided in the Country Development Plan already.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	Including objectives to carry out climate change risk assessments, including condition assessments, for the historic structures and sites in its area.	Noted. It was recommended the local authority consider this commentary.	None.	None.
	Including objectives to develop disaster-risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area.	Noted. It was recommended the local authority consider this commentary.	None.	None.
	Including objectives to develop resilience and adaptation strategies for the built and archaeological heritage in its area.	Noted. The Plan defines action that will improve the climate resilience of architectural and archaeological heritage within the local authority's remit.	None.	None.
	Developing the skills capacity within the local authority to address adaptation/mitigation/emergency management issues affecting heritage assets in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works.	Noted. It was recommended that the local authority consider this as appropriate.	None.	None.
	The Department will shortly be publishing a new guidance document Improving Energy Efficiency in Traditional Buildings. This guidance will assist retrofitting installers and specifiers in how best to choose and apply energy efficiency measures to the historic building stock. The guidance is also intended to assist building owners and occupants in making decisions about upgrading their buildings, many of which are of architectural heritage significance. It is recommended that all proposed retrofitting projects undertaken or supported by the local authority to buildings of traditional construction should follow the principles and practice set out in that guidance.	Noted. It was recommended that the local authority consider this as appropriate. The SEA Environmental Report defined mitigation measures within the plan to ensure that any retrofitting of buildings including protected structures is carried out in a manner that doesn't impinge on built heritage or protected structures.	None.	None.
	Finally, it is recommended that, where such officers are employed, the Architectural Conservation Officer, Heritage Officer and Archaeologist should be included on the local authority's Adaptation Steering Group.	Noted. It was recommended that the LA consider this as appropriate.	None.	None.
	You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: referrals@npws.gov.ie	Noted. It was recommended that the LA consider this as appropriate.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
Andrew Sulley Senior Environmental Health Officer Environment/Climate Change Network Support Unit	Be wary of Maladaptation. Some adaptation measures can be harmful (unintended and negative impact) and the plan must assess the potential harmful effect on population health. For example some efforts to enhance biodiversity may support the proliferation of disease transmitting vectors or take away informal play spaces for children.	Environmental mitigation measures and Environmental Governance Principles were defined in the Plan to prevent and minimize the environmental effects of Plan action, including adaptation measures.	None	None



## 2.5 SEA and Plan Modifications

DCC 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 consultation’s 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
C1.1	Addition of text to action C1.1 "Explore inclusion of community kitchen within libraries to support food strategy."
S2	Change 'quiet zones' to 'quiet areas' to align with noise action plan terminology
S4	Addition of text to S4 - 'Inclusion of Playful streets.'
N/A	Addition of indicators: <ol style="list-style-type: none"> <li>1. Doing temperature comparisons across the city to better assess the urban heat island effect</li> <li>2. Measuring ground level Ozone</li> <li>3. Aero allergens</li> <li>4. Monitoring of disease vectors – mosquitos, flies, ticks, and invasive species.</li> </ol>



## 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.

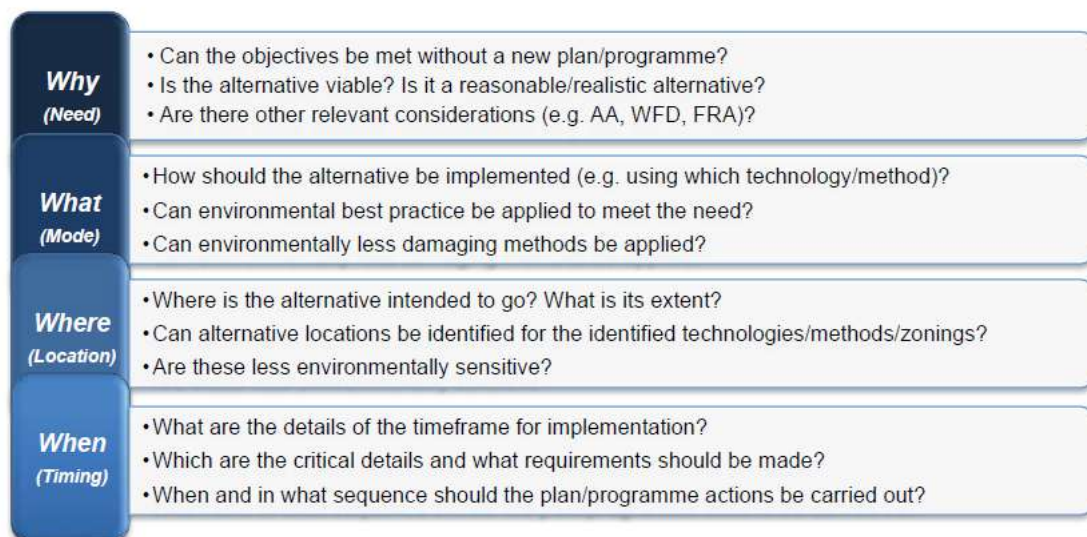
### 3.2 Approach to Developing Reasonable Alternatives

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

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

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

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





## 4. SEA CONCLUSION

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

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

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



## 5. SEA MONITORING

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

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

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

DCC are responsible for implementation of the SEA monitoring programme. The environmental effects (including positive, negative and cumulative effects) of LACAP implementation will be monitored once every year over the course of the plan's five-year lifetime. This monitoring will be carried out by the Climate Action section of Dublin City 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 City.	Lower-level plan and project accordance with the plan.	Require all lower-level plans and projects have appropriate regard to and appropriately support all action and development proposals defined in the Plan.  Ensure planning policy and climate action policy is aligned.	Review of Local Area Plans.  Internal monitoring of likely significant environmental effects of development projects.  Review of lower-level plan SEA documentation.
Population & Human Health	PHH1	Avoid or minimise impacts to population and human health.	Number of spatial concentrations of health problems arising from environmental factors as a result of implementing the Plan.	No spatial concentrations of health problems arising from environmental factors as a result of implementing the Plan.	Consultation with the Health Service Executive (HSE)/Health Atlas Ireland and the EPA.
	PHH2	Ensure the Decarbonising Zone avoids and minimises impacts to the existing economic activities within the area and does not compromise/conflict with existing land use objectives.	Compliance of action and development supported by the plan with policies and land use objectives protective/supportive of economic development in the city defined in the City Development Plan (CDP) or City Local Area Plans.	No contravention of policies and land use objectives protective/supportive of economic development in the city defined in the CDP or City Local Area Plans.  Planning consent for development proposals supported by the plan only to be granted where development will be carried out in accordance with proper planning and sustainable development.	Internal monitoring of compliance with CDP Policy Objectives.  Internal monitoring of likely significant environmental effects of development projects.
Biodiversity, Flora & Fauna	B1	Ensure Climate Action does not conflict with biodiversity protection, restoration and rehabilitation.	Compliance of action and development supported by the plan with policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the CDP.  Condition of habitats impacted by climate change (Area km <sup>2</sup> /length metres).	No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the CDP.  Ensure no habitats are impacted by the effects of climate change.  Ensure no reduction in the number of geographic distribution of species as a result of climate change effects.	Internal monitoring of compliance with CDP Policy Objectives.  Internal monitoring of compliance with the City 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 City'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 City's Biodiversity Action Plan.</p> <p>Planning consent for development proposals supported by the plan only to be granted where development complies with policy supporting biodiversity protection and enhancement.</p>	
	B2	Ensure compliance with Habitats and Birds Directives with regard to protection of European Sites and Annexed habitats and species <sup>4</sup> .	Condition of European Sites and annexed species.	No adverse impacts on the condition of European Sites and Annexed habitats and species as a result of plan implementation.	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Consultation with the NPWS.</p> <p>Department of Housing, Local Government and Heritage report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive.</p> <p>Department of Housing, Local Government and Heritage's National Birds Directive Monitoring Report for the Birds Directive under Article 12.</p> <p>Review of NPWS publications regarding the status of European sites.</p>

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



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	B3	Support Article 10 of the Habitats Directive with regard to the management of features of the landscape which - by virtue of their linear and continuous structure or their function as stepping stones (designated or not) - are of major importance for wild fauna and flora and essential for the migration, dispersal and genetic exchange of wild species.	<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 City 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.	Condition of semi-natural habitats, species, environmental features or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed for designation.	No adverse impacts on condition of semi-natural habitats, species, environmental features or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed for designation, as a result of plan implementation.'	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Mapping of LR important habitats and species as part of the City Biodiversity Plan.</p>
	B5	No net contribution to biodiversity losses or deterioration in response to the biodiversity emergency	Condition of semi-natural habitats, species, environmental features or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed for designation.	No adverse impacts on condition of semi-natural habitats, species, environmental features or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed	<p>Internal monitoring of compliance with CDP Policy Objectives.</p> <p>Internal monitoring of compliance with the City Biodiversity Action Plan.</p>



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
				for designation, as a result of plan implementation.'	Internal monitoring of likely significant environmental effects of development projects. Mapping of LR important habitats and species as part of the City Biodiversity Plan.
Landscape & Visual Amenity	L1	Avoid or minimise impacts to statutory landscape designations defined in the CDP.	<p>Status of Landscape Character Areas, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects.</p> <p>Number of developments consented that result in avoidable adverse impacts on Landscape Character Areas, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects.</p> <p>Number of areas in the local authority functional area designated for their landscape character.</p>	<p>All action and development proposals supported by the plan must comply with policy objectives relating to the protection of Landscape Character Areas, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects defined in the CDP.</p> <p>No development supported by the plan should have an adverse impact on Landscape Character Areas, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects.</p>	<p>Internal monitoring of compliance with CDP Policy Objectives.</p> <p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Review of future iterations of the Landscape Character Assessment.</p>
	L2	Avoid or minimise adverse visual effects on residential receptors or other sensitive visual receptors.	<p>Number of developments consented that result in avoidable adverse visual impacts on residential receptors or other sensitive visual receptors.</p> <p>Number of areas in the local authority functional area designated for their visual amenity.</p>	<p>No development supported by the plan should have a significant adverse visual impact on residential receptors or other sensitive visual receptors.</p> <p>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.</p>	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Review of future iterations of the Landscape Character Assessment.</p>



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



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
					Internal monitoring of length of new sustainable transport routes developed.
	AQN2	Avoid or minimise effects on local air quality.	<p>Number of developments consented that result in avoidable adverse air quality impacts on sensitive receptors.</p> <p>Number of exceedances of ambient air quality standards in the City, as monitored under the EPA's National Ambient Air Quality Monitoring Network.</p> <p>Improvements in air quality status in the city.</p>	<p>No development supported by the plan should have a significant adverse air quality impact on sensitive receptors.</p> <p>All development supported by the plan should adhere to relevant Development Management Standards defined in the CDP relating to the protection of air quality.</p> <p>Minimise ambient air quality standard exceedances in the City.</p>	<p>Internal monitoring of likely significant environmental effects of development projects. Consultation with the EPA.</p> <p>Review of EPA Air Quality Monitoring undertaken in the City.</p> <p>Review of EPA annual 'Air Quality in Ireland' Report</p>
	AQN3	Avoid or minimise adverse noise impacts.	Number of sensitive receptors exposed to noise nuisance.	No sensitive receptors exposed to nuisance noise in the City.	Internal monitoring of likely significant environmental effects of development projects. Monitoring of internal noise complaint investigations undertaken. Consultation with the EPA.
Water	W1	Maintain and/or improve, the quality and status of surface, transitional, bathing, and coastal waters.	<p>Status of surface water bodies as reported by the EPA Water Monitoring Programme for the Water Framework Directive (WFD)</p> <p>Status of bathing waters as monitored under the Bathing Water Directive.</p> <p>Number of water bodies achieving High or Good Ecological Status as defined by the WFD within the life-cycle of the Climate Action Plan.</p>	<p>Number of Pollution Incidents detected due to poor bathing water quality results.</p> <p>Not to cause deterioration in the status of any surface water or affect the ability of any surface water to achieve 'good status.</p> <p>Increase in number of water bodies achieving High or Good Ecological Status as defined by the WFD within the life-cycle of the Climate Action Plan.</p>	<p>EPA surface water monitoring data and reports.</p> <p>EPA bathing water monitoring data and reports.</p> <p>Review of environmental quality data detailed in the EPA Maps Application</p>





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



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



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	MAI4	Promote sustainable waste management.	<p>Tonnes of hazardous waste received at Council Waste Management Facilities annually.</p> <p>Tonnes of W.E.E.E. waste received at Council Waste Management Facilities annually.</p> <p>Tonnes of Bulky waste received at Council Waste Management Facilities annually.</p> <p>Tonnes of garden waste received at Council Waste Management Facilities annually.</p>	<p>Increase waste recycling in the City.</p> <p>Reduce waste generation in the City.</p>	EPA Waste Statistics. Consultation with the EPA.
	MAI5	Promote sustainable water use and drainage management.	<p>Level of water use in the City.</p> <p>Compliance with Sustainable Drainage System (SuDS) related development management standards defined in the CDP.</p>	<p>Reduced water use in the city.</p> <p>All development (supported by the plan) must comply with SuDS related development management standards defined in the CDP.</p>	<p>CSO water consumption data.</p> <p>Internal monitoring of flood risk associated with development projects and development project compliance with relevant flood risk and management related development management standards.</p>
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.	<p>Level of Greenhouse Gas (GHG) emissions in the City.</p> <p>Level of renewable energy infrastructure in the City.</p>	<p>Reduce GHG emissions associated with the Energy sector in the City.</p> <p>Increase the level of renewable energy infrastructure in the City.</p>	<p>EPA National Emission Inventory.</p> <p>Baseline Emission Inventory for the City.</p> <p>Megawatt hour (MWh) output from renewable energy infrastructure in the city.</p>
	CF2	Actively support the delivery of all national climate policy as appropriate to the city with the prioritisation and acceleration of evidence-based measures.	Level of GHG emissions in the City	Reduce GHG emissions for all sectors in the City.	EPA National Emission Inventory. Baseline Emission Inventory for the City.



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	CF3	Assist in the delivery of the climate neutrality objective at local and community levels.	Level of GHG emissions in the City. Level of GHG emissions in the Decarbonising Zone. Net addition of tree cover added.	Reduce GHG emission in the City to Net Zero. Reduce Decarbonising Zone GHG emissions to Net Zero. Increase level of tree cover in the City.	EPA National Emission Inventory. Baseline Emission Inventory for the City. Baseline Emission Inventory for the Decarbonising Zone.
	CF4	Deliver a Decarbonising Zone (DZ) within the local authority area to act as a test bed for a range of climate mitigation and adaptation measures in a specifically defined area through the identification of projects and outcomes that will assist in the delivery of the National Climate Objective.	Level of GHG emissions in the Decarbonising Zone.	Reduce Decarbonising Zone GHG emissions to Net Zero.	Baseline Emission Inventory for the Decarbonising Zone.
Inter-relationships	IR1	Maintain and improve the health of people, ecosystems and natural processes Actively seek to integrate opportunities for environmental enhancement during adaptation to climate change	Number of blue and green infrastructure measures included as part of development projects that have been granted planning consent.	Increase the number of blue and green infrastructure measures included as part of development projects that have been granted planning consent.	Review of granted planning consents.



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