

CONSULTANTS IN ENGINEERING, ENVIRONMENTAL SCIENCE & PLANNING

LOCAL AUTHORITY CLIMATE ACTION PLAN

Strategic Environmental Assessment Statement

Prepared for:

Tipperary County Council



Date: February 2024

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

T: +353 21 496 4133 | E: info@ftco.ie

CORK | DUBLIN | CARLOW

www.fehilytimoney.ie





Strategic Environmental Assessment Statement

REVISION CONTROL TABLE, CLIENT, KEYWORDS AND ABSTRACT

User is responsible for Checking the Revision Status of This Document

R	ev. No.	Description of Changes	Prepared by:	Checked by:	Approved by:	Date:
	1	Final	RD/AMW/MG	RD	BG	14/02/2024

Client: Tipperary County Council (TCC)

Keywords: Strategic Environmental Assessment, Appropriate Assessment, SEA Statement, SEA

Scoping, SEA Environmental Report, Local Authority Climate Action Plan.

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

Assessment Statement for the Tipperary Local Authority Climate Action Plan to Tipperary County Council (TCC) 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).

P23-114 www.fehilytimoney.ie



TABLE OF CONTENTS

1.	INTRODUCTION1		
	1.1	Background1	
	1.2	Legislative Context	
2.		ENVIRONMENTAL CONSIDERATIONS WERE INTEGRATED INTO LOCAL AUTHORITY CLIMATE ACTION 2024 - 2029	
	2.1	SEA Scoping3	
	2.2	Environmental Assessment and Mitigation6	
		2.2.1 Mitigation through consideration of alternatives	
		2.2.2 Mitigation through integration of environmental considerations into the LACAP6	
		2.2.3 Mitigation through consideration of development management standards/environmental protection objectives contained in the CDP14	
	2.3	Appropriate Assessment	
	2.4	Consultation on SEA Environmental Report	
	2.5	SEA and Plan Modifications30	
3.	CONSI	DERATION OF ALTERNATIVES33	
	3.1	Introduction	
	3.2	Approach to Developing Reasonable Alternatives	
	3.3	Identification and Description of Reasonable Alternatives	
	3.4	Evaluation of Reasonable Alternatives and Reasons for Choosing the Preferred Plan36	
4.	SEA CO	ONCLUSION	
5.	SEA M	IONITORING38	



LIST OF FIGURES

	<u>Page</u>
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)

LIST OF TABLES

Table 2-1:	Summary Detail on Scoping Consultation Submissions Received from Environmental Authorities
Table 2-2:	Proposed Environmental Mitigation Measures - Additional text included in Plan actions relating to environmental protection related obligations and environmental enhancement opportunities
Table 2-3:	Proposed Environmental Mitigation Measures - Environmental Governance Principles included in the plan
Table 2-4:	Responses to Consultation Submissions
Table 2-5:	Plan Action Modifications30
Table 3-1:	Reasonable Alternatives to the LACAP
Table 5-1:	SEA Monitoring Programme

P23-114 www.fehilytimoney.ie — Page ii / ii



1. INTRODUCTION

1.1 Background

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

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

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

1.2 Legislative Context

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

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

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

P23-114 www.fehilytimoney.ie Page 1 of 47

-

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

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

CLIENT: Tipperary County Council (TCC)

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



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

P23-114 www.fehilytimoney.ie — Page 2 of 47



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

2.1 SEA Scoping

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

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

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

P23-114 www.fehilytimoney.ie Page 3 of 47

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



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

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

P23-114 www.fehilytimoney.ie Page 4 of 47

CLIENT:

PROJECT NAME:

Tipperary County Council (TCC)
SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



Environmental Authority	Summary on the Scoping Consultation Submission	How was this submission taken into account during the SEA?
	Specific advice on geological/hydrogeological considerations that needed to be taken into account during the making of the Plan was provided, as follows:	
	 Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. 	
	Geohazards should be considered during the Plan-making and development processes.	
	 Sustainable development of our natural resources should be an integral part of all development plans from a national to regional to local level to ensure that the materials required for our society are available when required. 	

www.fehilytimoney.ie -P23-114 Page 5 of 47



2.2 Environmental Assessment and Mitigation

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

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

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

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

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

2.2.2 Mitigation through integration of environmental considerations into the LACAP

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

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

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

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

P23-114 www.fehilytimoney.ie — Page 6 of 47



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

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

	• • • • • • • • • • • • • • • • • • • •	
LACAP Action Reference	LACAP Action	Mitigation Measure
1.3	Prepare and apply a project design stage checklist to enable and demonstrate 'Climate Proofing' of local (local authority-led) capital projects, for example; projects funded under the 'Outdoor Recreation Scheme', 'Active Travel Scheme', 'Urban Regeneration and Development Fund' etc. The intention will be to help guide the incorporation of climate actions such as biodiversity enhancement, carbon capture, walking and cycling, public transport, nature-based solutions, urban greening, rainwater harvesting, renewable energy technology, infrastructure for zero emission vehicles at project design stage etc. Significant cross-boundary projects that are already subject to Climate Change Appraisal are not subject to this process.	Attach the following text to the action: 'ensuring the protocol has appropriate regard to environmental protection requirements and opportunities for promoting climate action co-benefits.'
2.3	Carry out an Ecological/Habitat audit of local authority owned land, in accordance with an agreed methodology, to identify areas suitable for restoration and enhanced carbon storage though tree-planting and biodiversity measures.	Attach the following text to the action: 'having due regard to the need to conserve and enhance protected species, biodiversity and European sites on or connected to local authority lands.'
2.7	As part of the Royal Sites Steering group on the UNESCO world heritage Tentative List for Ireland, ensure that climate adaptation and mitigation measures are considered as part of the nomination process, and support where possible climate related studies/ assessments at the sites	Attach the following text to the action: As part of the Royal Sites Steering group on the UNESCO world heritage Tentative List for Ireland, ensure that climate adaptation and mitigation measures - which are designed in manner that will not result in unintended adverse effects on heritage assets - are considered as part of the nomination process; and support where possible climate related studies/ assessments at the sites.
3.1	Prepare and implement a pipeline of projects and initiatives for Local Authority Buildings/Facilities to assist in achieving a 51% reduction in non-electrical building emissions (thermal) by 2030. Programme to include (at the minimum) for the following: Building Stock Plans Prepare Buildings for 2050 in so far as practical (Net Zero Emissions) Energy Efficiency Projects Reduce Your Use' initiatives (see Action 1.15) Renewable Energy Technologies Lifecycle analysis/Green Public Procurement Consideration of specialist building requirements i.e. HVAC in Museum, fire training services etc. Consider use of emerging technologies and materials	Attach the following text to the action: 'Due regard shall be had to relevant planning and environmental protection criteria, including the need to protect European sites, when implementing this action.'

P23-114 www.fehilytimoney.ie — Page 7 of 47



LACAP Action Reference	LACAP Action	Mitigation Measure	
	Note: See related Action 5.3 Nature-based solutions and integrated rainwater management protocol.		
	Prepare and implement a pipeline of projects and initiatives for Council Fleet and Transport Management operations to assist in achieving a 51% reduction in non-electrical transport greenhouse gas emissions by 2030. Programme of measures to include (at the minimum) for the following:		
	 Prepare a 'Fleet Decarbonisation Roadmap' 		
	Review of driver behaviour		
	 Education and training programme for Fleet Vehicle Drivers 	Attach the following text to the action:	
3.2	 Review of fuel procurement procedures 	'Whilst ensuring energy/fuel used to power local authority alternative vehicles is sustainably sourced, and	
	 Move to alterative vehicles, including EV, and alternative fuel types including HVO. 	appropriate end-of-life management practices are in place for Electric Vehicles.'	
	 Optimisation of road works programme 		
	 Continue the exploration of acquiring more carbon efficient large vehicles 		
	 Consider use of emerging technologies and materials 		
	 Ensure that alternative fuel sources are sustainably sourced and appropriate end-of-life management practices are in place for Electric Vehicles. 		
	Prepare and implement a range of measures to achieve Overall Emissions Reductions of 51% by 2030 (2016-2018 baseline), and achieve 50% energy efficiency metric (2006-2008 baseline).		
3.3	This will require implementation of the actions outlined in items 3.1 and 3.2, and also a focus on other emissions reductions and adaptation measures, mainly electrical and such as: • Energy Efficient Public Lighting	Attach the following text to the action: 'while ensuring potential actions maintain/control or reduce existing lumen levels and spectral range to avoid effects on biodiversity.'	
	Energy Efficient Building Lighting		
	Note: Ensure that potential actions maintain/control or reduce existing lumen levels and spectral range to avoid effects on biodiversity.		
		Attach the following text to the action:	
3.4	Participate/lead in national/regional funding programmes for local authorities, for example, the SEAI Energy Retrofit 'Pathfinder' funding programme etc., to support funding for emissions reductions measures.	'whilst advocating and exerting influence to ensure that all retrofitting works will prioritise energy efficiencies and renewable energy generation (solar PV, geothermal and micro wind generation where feasible); having due regard to environmental sensitivities such as European sites and biodiversity.'	
	Davidon an Electric Vehicle Strategy for Timeron, and	Attach the following text to the action:	
3.5	Develop an Electric Vehicle Strategy for Tipperary and commence implementation of the actions/recommendations/targets as identified.	'having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.'	

P23-114 www.fehilytimoney.ie — Page 8 of 47



LACAP Action Reference	LACAP Action	Mitigation Measure
3.6	Roll-out public Electric Vehicle charge points in line with targets set out in Electric Vehicle Strategy (Action 3.5)	Attach the following text to the action: 'having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.'
3.7	Continue to roll-out the Council's Active Travel Programme maximising available funding from the NTA	Attach the following text to the action: 'having appropriate regard to environmental sensitivities such as traffic and transport constraints and aspects, the receiving water environment, local air quality, biodiversity, European sites and cultural heritage.'
3.8	Carry out an assessment for the delivery of 'car-restricted zones' with reallocation of space, in certain suitable areas i.e., town centres, schools etc. where the focus should be on active travel, business and amenity, as appropriate.	Attach the following text to the action: 'having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.'
3.9	Deliver new Greenway Infrastructure in line with the provisions of the National Cycle Network.	Attach the following text to the action: 'having due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites and cultural heritage.'
3.11	Deliver the Clonmel Pathfinder Programme (1 of 35 exemplar transport projects) by 2025, subject to funding.	Attach the following text to the action: 'having due regard to local environmental sensitivities such as water quality, European sites, biodiversity and amenity value, and the need to protect and conserve buildings and structures of architectural or cultural heritage value.'
3.13	Implement an annual housing retrofit programme for local authority housing stock in accordance with funding programmes such as the National Retrofit Plan (DECC) and other relevant programmes.	Attach the following text to the action: 'having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity, and the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations.'
3.16	The Council will seek to show leadership by the design and construction of Net-Zero Homes as part of their building programmes.	Attach the following text to the action: 'having due regard to environmental sensitivities such as visual amenity and quality, local human receptors, Biodiversity, European sites, water quality and hydrology, and amenity value.'
3.17	Implement and promote across Council networks, national building refurbishment and vacancy programmes for private sector housing, for example Croí Cónaithe scheme.	Attach the following text to the action: '- Where doing so would not actively encourage a modal shift toward private car use, and, - Having due regard to the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations, and the need to not negatively impinge on any protected species and European sites. 'having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity, and the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations.'
3.18	Carry out a feasibility study to identify a suitable Local Authority-Led District Heating programme. If feasible, develop a local authority-led District Heating project in a Key Town (Clonmel, Nenagh or Thurles).	Attach the following text to the action: Carry out a feasibility study to identify a suitable Local Authority-Led District Heating programme, ensuring such a report has appropriate regard to planning and environmental protection considerations.

P23-114 www.fehilytimoney.ie — Page 9 of 47



LACAP Action Reference	LACAP Action	Mitigation Measure
		If feasible, develop a local authority-led District Heating project in a Key Town (Clonmel, Nenagh or Thurles), having due regard to the need to protect sensitive aspects of the receiving environment, such as water bodies, biodiversity, flora and fauna, European sites and local population, from potential negative effects of development, including linear development associated with the project.
4.2	In line with the Town-Centre First programme, reduce vacancy and dereliction in Key Towns, District Towns and Service Centres by collaborating with owners in finding ways that these structures can be brought back to use.	Attach the following text to the action: 'having due regard to the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations, and the need to not negatively impinge on any protected species.'
4.3	In order to underpin the delivery of an active travel programme, support preparation of 'Local Transport Plans' for Key Towns and Sustainable Travel Plans' for 'District Towns.'	Attach the following text to the action: 'whist ensuring these plans are: - Designed to mitigate potential environmental impacts associated with supported active travel infrastructure. - Support the carrying out of environmental/biodiversity enhancement during the active travel development process.'
4.4	Support the delivery of an 'Integrated Transport Hub' in the Key Towns of Clonmel, Nenagh and Thurles to incorporate and support multi-modal services and active travel linkages with town centre areas/regional services.	Attach the following text to the action: 'having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, and cultural heritage.'
4.12	Seek to actively support the development of the bioeconomy in Tipperary, including new and emerging technologies, both in the Decarbonising Zone (National Bio-Economy Campus) and elsewhere in the county in line with the National Bio-Economy Action Plan 2023 – 2025.	Attach the following text to the action: 'whilst advocating and exerting influence to ensure Bioeconomy related development and activities promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.'
5.1	The Council will seek to prioritise the delivery of Catchment Flood Risk Assessment and Management (CFRAM) Programme identified flood schemes in Tipperary.	Attach the following text to the action: 'having due regard to the need to promote nature based solutions and Sustainable Drainage Systems, and environmental sensitivities at these locations, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.'
5.5	Introduce and implement a policy in relation to how Council owned spaces are managed to improve biodiversity levels in keeping with the 'All Ireland Pollinator Plan,' and as part of this to develop and implement a pesticide reduction policy for lands and areas managed by the Council.	Attach the following text to the action: 'ensuring these substances are only used to a degree that does not cause significant effects on the receiving environment, such as the receiving water environment, biodiversity or European sites.'
5.8	Building on the 'Tipperary County Wetland Survey,' develop a Wetland Restoration Plan, this shall identify priority areas for habitat restoration, carbon capture and biodiversity benefits, along with phasing for restoration.	Attach the following text to the action: 'having due regard to the need to appropriately protect, conserve and enhance important habitats and species and European sites, and support the maintenance and improvement of water quality in line with the aims of the Water Framework Directive.'



LACAP Action Reference	LACAP Action	Mitigation Measure
6.11	Support and inform a climate proofing programme for natural water resources, and to better manage flooding at the catchment level, the Council will identify a subcatchment where water quality objectives are not being met, and where there is an established flood risk. A study will be commissioned for this sub-catchment to: I. Identify the reasons why Water Framework Directive water quality objectives are not being met, ii. Set out baseline water quality standards to enable monitoring, iii. Identify solutions (incl nature based) to reducing flood risk at the catchment level, and, iv. Set out viable, positive and collaborative mechanisms at the community level for how they can be delivered.	Attach the following text to the action: 'The programme shall have due regard to the protection of biodiversity and European sites and avoidance of habitat fragmentation.'
6.16	Continue to organise training/seminars to promote adaptive reuse of historic and protected structures.	Attach the following text to the action: 'having due regard to the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations, and the need to not negatively impinge on any protected species and European sites.'
6.18	Carry out a feasibility assessment of Council owned land assets to determine if it would be possible to identify a site(s) for a 100% owned community-led Renewable Energy development. If considered feasible, progress the project to delivery.	Attach the following text to the action: Carry out a feasibility assessment of Council owned land assets to determine if it would be possible to identify a site(s) for a 100% owned community-led Renewable Energy development, ensuring the study has appropriate regard to planning and environmental protected considerations. If considered feasible, progress the project to delivery, having appropriate regard to relevant planning and environmental protection criteria.
8.6	Participate/lead in strategic projects and collaborations, for example, The Atlantic Green Digital Basin Shannon etc., in order to enhance opportunities for Green/Renewable Energy in Tipperary	Attach the following text to the action: 'whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.'
9.1	Work with and support the National Transport Authority and Tipperary Transport Co-ordination Unit in the delivery and expansion of public transport initiatives in the county.	Attach the following text to the action: 'whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.'
9.2	Resolve local flooding issues utilising OPW and Department of Transport funding (Drainage programme, Climate Adaptation and Resilience Works, OPW Minor Works Scheme and Nature Based Solutions.	Attach the following text to the action: 'having due regard to the protection of biodiversity and European sites and avoidance of habitat fragmentation.'
9.3	Commence a 'Bridge Structures Inspection Programme' to determine and respond to the effects of climate change and the increased risk of bridge structures being compromised (increased flows, more debris in flood waters, increased flood levels etc.).	Attach the following text to the action: 'having due regard to the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations, and the need to not negatively impinge on any protected species or European sites.'
9.6	Advocate for improved rail transport services on interregional routes, key improvements to include: i. The reopening of the rail route between Rosslare harbour and Waterford Town.	Attach the following text to the action: 'Advocate and exert influence to ensure such improvements promote climate action co-benefits and do not contravene relevant environmental protection



LACAP Action Reference	LACAP Action	Mitigation Measure
	ii. Improved rail services/facilities on existing rail routes (Limerick to Waterford and Limerick, Ballybrophy/Dublin lines) that service Tipperary's Towns iii. The development of a rail freight hub at Limerick Junction.	criteria or cause significant negative environmental effects.'
9.7	Advocate for improved bus transport in Tipperary and in the region, key improvements to include: New routes Integrated ticketing Increased services	Attach the following text to the action: 'Advocate and exert influence to ensure such improvements promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.'
DZ Potential Action (1.2)	Explore options for synergy between the National Bio Economy Campus and local communities e.g., through district heating, power generation.	Attach the following text to the action: 'whilst advocating and exerting influence to ensure that all associated development has due regard to the need to protect sensitive aspects of the receiving environment, such as water bodies, biodiversity, flora and fauna, European sites and local population.'.
DZ Potential Action (2.3)	Support the concept of village digitalisation/smart villages initiative though funding sources, for example LEADER etc.	Attach the following text to the action: 'whilst ensuring associated development works are designed and implemented in a manner that does not cause significant negative environmental effects.'
DZ Potential Action (4.1)	Offer pre-planning advice for renewable energy investments	Attach the following text to the action: 'including advise on planning policy, relevant development management standards and environmental protection requirements.'
DZ Potential Action (4.3)	The Council and partners to explore the feasibility of the development of a renewable energy development in the area with community partnership	Attach the following text to the action: 'whilst ensuring that any associated renewable energy development has appropriate regard to planning and environmental protection criteria.'
DZ Potential Action (5.1)	Roll-out relevant Local Authority Climate Action Plan initiatives in the area including existing programmes relating to public lighting, housing retrofit etc. Refer to the Local Authority Climate Action Plan Actions	Attach the following text to the action: 'having due regard to environmental sensitivities such as heritage protection, European sites, protected species, biodiversity and amenity value.'
DZ Potential Action (7.1)	Support 'Local Link' in decarbonising their fleet and supporting sustainable transport options in the area	Attach the following text to the action: 'whilst advocating and exerting influence to ensure appropriate regard is had to the lifecycle impacts and sustainability of alternative fuel options.'
DZ Potential Action (7.4)	Support the roll out EV charging points in the area using funding under the ZEVI programme	Attach the following text to the action: 'having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.'
DZ Potential Action (9.3)	Avail of relevant Just Transition Fund and other funding sources to support projects that include for peatlands restoration, carbon capture, the bio-economy, and sustainable trail development.	Attach the following text to the action: 'having due regard to the need to ensure such development does not cause unintended negative environmental effects.'
DZ Potential Action (9.4)	Co-ordinate with stakeholders to seek opportunities for synergies between land use diversification and the National Bio-Economy Campus	Attach the following text to the action: 'whilst ensuring land use diversification activities that may be supported by this action do not result in unintended negative environmental effects.'



LACAP Action Reference	LACAP Action	Mitigation Measure
DZ Potential Action (10.1)	Support Sustainable Tourism using the natural, cultural and historical assets of the area. Help to support the development of low-carbon and sustainable tourism attractions in the area in conjunction with stakeholders.	Attach the following text to the action: 'whilst having due regard for environmental sensitivities including biodiversity and European sites.'
DZ Potential Action (10.3)	Help to consider the potential of the area as a vibrant zone for eco-tourism and slow tourism.	Attach the following text to the action: Help to consider the potential of the area as a vibrant zone for sustainable eco-tourism and slow tourism, having due regard to sensitivities including biodiversity, European sites and the receiving water environment.
DZ Potential Action (10.4)	Help to support and develop the area noting its unique cultural, industrial and mining past as a tourism experience.	Attach the following text to the action: 'having due regard to all environmental sensitivities associated with the area, including sensitive heritage features.'

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

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

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

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

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

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

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

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 county.

Ensure all projects supported by the council have taken the necessary precautions to identify and manage invasives species, particularly with regard to Schedule III species. No climate action related development project that is likely to cause the spread of invasives species listed in Schedule III shall be supported.

Support opportunities to support peatland restoration, rehabilitation and maintenance while achieving climate targets through the implementation of the climate actions within the plan.

P23-114 www.fehilytimoney.ie — Page 13 of 47



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

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

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 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
Sea Fisheries coordination DAFM	Ireland's seafood industry (fishing and aquaculture) is one of the key stakeholders operating in the marine area and plays a vital role in the sustainability of our coastal communities. Over 15,000 people are employed around our coast both directly and indirectly. Many of these communities have very limited alternative employment and economic activity options. It is therefore essential that the socio-economic reliance on the seafood sector is fully recognised and is factored into any Climate Change Action plan. Fishing and food security is as key a part of Government Policy. Food Vision 2030 recognises and values the role of primary food producers.	Noted. It was noted that Tipperary is a non-coastal county.	None	None.
	The Seafood industry is experiencing a period of difficult change, arising from the ongoing consequences of the EU UK Trade and Co-operation agreement which are specific and impactful on Ireland's seafood sector. There is now ever-increasing demand on the marine space from Offshore Renewable Energy (ORE), Marine Spatial Planning, Marine Protected Areas (MPAs), and other environmental measures.	Noted. It was noted that defined Climate Action in the LACAP does not promote or support marine development. The county is non-coastal.	None	None.
	Our coastal communities and maritime sectors will continue to play a significant role in contributing to our climate goals and will continue to be consulted and supported in the transition to carbon neutrality. The seafood industry, through both the Sectoral Adaptation Plan (Agriculture, Forest and Seafood Climate Change Sectoral Adaptation Plan) and the annual Climate Action Plan (CAP23) continue to support initiatives to improve understanding of our marine area and ensure sustainable resource use, including through bio and circular economy initiatives. These plans require consideration in the SEA process.	The National Climate Action Plan (2023) and Sectoral Adaptation Plans have been considered in the SEA Process. The relationship of the Plan with other relevant Plans and Programmes has been defined in Appendix 1 of the SEA. Inter-plan cumulative effects have been evaluated in Section 7 of the SEA ER.	None	None.

www.fehilytimoney.ie -P23-114 Page 15 of 47



Tipperary County Council (TCC)
SEA Statement for the Local Authority Climate Action Plan 2024 - 2029

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	Also for consideration in the SEA process is the European Commission's Communication on the energy transition of the fisheries and aquaculture sector as part of its Fisheries Policy Package. This proposes the establishment of an Energy Transition Partnership (ETP) to develop a roadmap for the energy transition of the sector towards climate neutrality by 2050. The roadmap will set out investment needs, sector initiatives and inform policy decisions to help achieve this transition. The ETP is a multi-stakeholder platform intended to promote co-operation, knowledge sharing and dialogue between private and public stakeholders in order to accelerate the energy transition in the fisheries and aquaculture sector. This Partnership will help to shape the development of future transitional actions for Ireland's seafood sector. Local authorities should include relevant steps to support a Just Transition for the sea fisheries and aquaculture sectors in their Climate Action Plans.	This commentary was noted. Local authorities in Ireland do not have a direct remit over the fisheries and aquaculture sector. The actions defined in the Plan are however mutually symbiotic and harmonious with the vision and measures defined in European Commission's Communication on the energy transition of the fisheries and aquaculture sector. Insofar as the local authority's remit extends, the plan supports the protection and enhancement of the marine environment. The climate action defined in the plan has the potential to generate multiple climate action benefits, and co-benefits for the water and biodiversity environments and by extension the marine environment (i.e. biodiversity conservation and enhancement, coastal protection, water quality protection and improvements etc.). It was noted that Tipperary is a non-coastal county which does not have a seafood sector.	Reference was made to the European Commission's Communication on the energy transition of the fisheries and aquaculture sector in Section 3.4 - Incombination effects with Other Plans and Programmes, and Appendix 2 - Relationship with other plans and programmes, as appropriate.	Reference was made to the European Commission's Communication on the energy transition of the fisheries and aquaculture sector in Section 7.3 - Potential Cumulative Effect of the Draft LACAP in combination with other Plans and Projects, and Appendix 1 - Relationship of the Plan with other relevant Plans and Programmes, as appropriate.
EPA	The SEA should also assist in identifying ways to maximise the potential co-benefits of climate-related measures for air quality, human health, biodiversity, water quality and other interrelated areas (i.e. win-win solutions).	Noted and agreed. It was noted that the SEA Environmental Report (ER) has defined Environmental Governance Principles and action amendment suggestions to ensure climate action co-benefit opportunities are maximized. Various defined mitigation measures serve to promote winwin solutions.	None.	None.
	We recommend that the findings of the SEA ER and NIS are fully reflected in the Plan, to ensure that the relevant recommendations are fully considered and integrated as appropriate.	Noted and agreed. Environmental mitigation measures in the form of Environmental Governance Principles and climate action amendment suggestions have been fully integrated into the Plan itself.	None	None
	Environmental Authorities Under the SEA Regulations, you should consult with: Environmental Protection Agency; Minister for Housing, Local Government and Heritage;	Noted. All listed Environmental Authorities have been consulted with as part of the SEA process. It was recommended the Council confirm receipt of this submission with Cian O' Mahony, if wasn't hasn't been done already.	None	None

www.fehilytimoney.ie -P23-114 Page 16 of 47



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	 Minister for Environment, Climate and Communications; Minister for Agriculture, Food and the Marine. If you have any queries or need further information in relation to this submission, please contact me directly at c.omahony@epa.ie. I would be grateful if you could send an email confirming receipt of this submission to: sea@epa.ie. 			
	Non-Technical Summary You should ensure that the Non-Technical Summary includes the relevant information as required under Schedule 2 of S.I No. 434 Of 2004, as amended.	It was assumed that SI No. 434 is a typo and SI No. 435 is what was intended to be addressed with this statement. The requirements of Schedule 2 of SI No 435 have been noted and amendments to the NTS were be made as appropriate.	None	Updated the NTS to reflect the relevant information as required under Schedule 2 of SI No 435 of 2004 as amended.
	Relationship with other plans and programmes We acknowledge that the Plan has been prepared taking account of the key National plans including the National Climate Action Plan 2023. We also acknowledge that the Plan sets out the key plans, programmes and policies considered in preparing the SEA. The Plan should include a commitment to remain aligned with high level plans and programmes, Guidelines, and legislation over its lifetime. The Climate Action Plan 2024 is currently being prepared and work will be commencing on the review of the National Planning Framework and Regional Spatial and Economic Strategies also. Any relevant updates of these plans/strategies should be integrated as appropriate into the Plan as relevant and appropriate.	Noted and agreed. It was noted that this is in reference to the LACAP and not the SEA ER or AA NIR documentation. It was recommended the Council includes a commitment in the Plan to remain aligned with high level plans and programmes if this isn't the case already. 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.	None	None

P23-114 www.fehilytimoney.ie — Page 17 of 47

CLIENT: PROJECT NAME:

Tipperary County Council (TCC)
SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	The Plan should include a commitment to consider any relevant updated actions, measures or recommendations that may arise in updates to the National Climate Action Plan (or the National Planning Framework) over the lifetime of the Plan.			
	Strategic Environmental Objectives We recommend that in considering strategic environmental objectives, they should where possible reflect the plan being prepared, rather than use more generic environmental objectives. This will help both in considering more specific monitoring and mitigation measures, when required.	Noted. The Strategic Environmental Objectives defined have been very specifically defined to reflect the themes, goals, objectives and climate action contained in the plan and in light of the potential environmental effects associated with Plan implementation.	None	None
	Alternatives We note the alternatives considered in the SEA and	Noted.	None	None.
	acknowledge the preferred option selected.			
	Mitigation Measures Where the potential for likely significant effects has been identified, you should provide appropriate mitigation measures to avoid or minimise these. You should also ensure that the Plan includes clear commitments to implement the relevant mitigation measures.	The SEA produced recommended a suite of mitigation measures in response to climate actions considered to have potentially significant environmental effects. Environmental Governance Principles have been defined for the purpose of underpinning and framing the defined climate actions. All activities and development supported by the defined climate actions shall be undertaken or influenced by the local authority, as appropriate, in accordance with these Environmental Governance Principles. Mitigation has also been achieved by the integration	None	None.
		of environmental considerations into the defined LACAP climate actions. These mitigation measures have been wholly		
		integrated into the LACAPs. Section 8 of the SEA ER provides full detail of these environmental mitigation measures.		

www.fehilytimoney.ie -P23-114 Page 18 of 47



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
		It was recommended the Plan provides a clear commitment to implement these mitigation measures if this isn't the case already.		
	Monitoring, Implementation & Reporting The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out	The SEA Monitoring Programme established for the LACAP is contained in the SEA ER. This monitoring programme has been developed in accordance with EPA guidelines entitled 'Guidance on SEA Statements and Monitoring' (2020). The monitoring programme is multi-facetted, broad in scope and has been designed to allow for a	None	Updated the SEA monitoring programme to ensure SEOs accommodate the monitoring of positive effects arising due to plan implementation,
	the various data sources, monitoring frequencies and responsibilities.	flexible and adaptive approach to SEA monitoring during Plan implementation.		where appropriate. Provide additional detail
	If the monitoring identifies adverse impacts during the implementation of the Plan, then you should ensure that suitable and effective remedial action is taken.	The monitoring programme has been designed to inherently measure cumulative effects that may arise due to the implementation of the Plan.		on monitoring programme data sources.
	Guidance on SEA-related monitoring is available on the EPA website at https://www.epa.ie/publications/monitoring	This plan considers both positive and negative effects, as per the following statement from the SEA text:		
	nttps://www.epa.ie/publications/monitoring assessment/assessment/strategic-environmental- assessment/06695-EPA-SEA-Statements-and-Monitoring- Report.pdf	'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.'		

P23-114 www.fehilytimoney.ie Page 19 of 47

CLIENT: PROJECT NAME:

Tipperary County Council (TCC)
SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
		It is noted however that additional opportunities exist in relation to monitoring the positive environmental effects of defined climate action – in connection with SEOs PHH1, L1, AQN2, TR1. The SEA monitoring programme will be updated, where appropriate, to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects arising due to plan implementation, wherever appropriate. The monitoring programme includes detail on the indicators, targets and data sources to be used to monitor and measure progress. Some additional detail on data sources has however been provided to better guide the SEA monitoring to be carried out across plan implementation. A commitment to remedial action in the event SEA monitoring shows the implementation of the Plan is having adverse environmental effects has been made in the SEA.		
	EPA State of the Environment Report Our State of Environment Report, Ireland's Environment - An Integrated Assessment 2020 (SOER2020) identifies thirteen 'Key Messages for Ireland'. Delivering Ireland's long term sustainable development and environmental objectives will involve many different stakeholders to address these key actions. The report recognises the need for full implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies. 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.	Noted. It is recommended the Council make a commitment to take account of any relevant recommendations in the SOER 2024 report, once published, in implementing the Plan over its lifetime.	None	None

www.fehilytimoney.ie -P23-114 Page 20 of 47 Tipperary County Council (TCC)
SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	SEA Statement – "Information on the Decision" Once the Plan is adopted, you should prepare an SEA Statement that summarises:	Noted. An SEA statement will be produced and circulated to any environmental authority consulted during the SEA process.	None	None
	How environmental considerations have been integrated into the Plan;			
	How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;			
	The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,			
	The measures decided upon to monitor the significant environmental effects of implementation of the Plan.			
	You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.			
	Future Amendments to the Plan	Noted.	None	None
	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			
The Department of Housing, Local Government and Heritage (DHLGH)	Archaeology 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.	Noted.	Reference was made to the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) in Section 3.4 - Incombination effects with Other Plans and Programmes, and Appendix 2 - Relationship with other plans and programmes, as appropriate.	Reference was made to the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019) in Section 7.3 - Potential Cumulative Effect of the Draft LACAP in combination with other Plans and Projects, and Appendix 1 - Relationship of the Plan with other relevant Plans

P23-114 www.fehilytimoney.ie Page 21 of 47

CLIENT:





Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
				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:		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.

www.fehilytimoney.ie -P23-114 Page 22 of 47 Tipperary County Council (TCC)
SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



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

P23-114 www.fehilytimoney.ie Page 23 of 47



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

P23-114 www.fehilytimoney.ie — Page 24 of 47



IE:	SEA Statement for the Local Author	ority Climate Action Plan 2024 - 2029
-----	------------------------------------	---------------------------------------

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	IFI encourages the use of soft engineering solutions are the way to sensitively increase flood reliance in a river system. Nature based solutions can involve approaches such as bank protection using tree logs, natural water retention and restoring natural river processes. Encouraging meanders in rivers will improve local flow conditions and slows water during high flow conditions.	The Plan promotes the use of Nature Based Solutions and Sustainable Drainage Systems as ways to promote flood resilience. It was recommended the local authority has further regard to these comments during plan implementation.	None.	None.
	IFI also encourage the idea of self-rehabilitation of a river system by being "left alone". By ceasing activities such as channel maintenance, this allows time for the river processes of erosion and deposition to normalise. Daylighting/deculverting of waterbodies within the county is also considered a natural method of flood management which IFI would fully support. Council commitment to reject proposals that would interfere with natural floodplains would greatly benefit both aquatic and riparian features in the surrounding areas.	Environmental protection considerations have been appropriately integrated into flood resilience related action defined within the plan. Climate action defined in the Plan supports the protection and enhancement of biodiversity, including riparian buffer zones and aquatic habitat. It was recommended the local authority has further regard to these comments during plan implementation.	None.	None.
	Nature-based solutions should be considered from the beginning of the development planning process. Nature Based SuDS work with nature (rather than trying to control it) and are now being mainstreamed across the globe. The benefits of taking a nature-based approach includes not just flood risk management benefits, but also improved water quality, biodiversity and climate adaptation and mitigation. In terms of surface water runoff, it is always best to deal with pollutants as close to the source as possible, rather than transferring the pollution elsewhere.	The Plan promotes the use of Nature Based Solutions and Sustainable Drainage Systems as ways to promote flood resilience. It was recommended the local authority has further regard to these comments during plan implementation.	None.	None.
	Nature-based solutions allows polluted runoff to be treated close to where the rain falls and can improve the quality of surface water runoff and decrease runoff volumes. They can also help combat the adverse effects of climate change by reducing temperatures at street level in urban areas and reducing volumes of rainfall-runoff which can aid to alleviate flooding issues.	The Plan promotes the use of Nature Based Solutions and Sustainable Drainage Systems as ways to promote flood resilience. It was recommended the local authority has further regard to these comments during plan implementation.	None.	None.

Page 25 of 47 P23-114 - www.fehilytimoney.ie -



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	The Department of Housing, Local Government and Heritage have recently published the following interim guidance document on Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document, which should be considered when designing drainage systems. It discusses Water Sensitive Urban Design (WSUD), which is an approach to design that delivers greater harmony between the water cycle, the environment, and communities. IFI should be consulted when resolving local flooding issues incorporating Nature Based Solutions. The CAP should include incentives and policies to enhance the uptake of Nature Based Solutions in new private developments. The multifunctional asset value of Nature Based Solutions should be laid out and the extent of the benefits provided be quantified to encourage the use.			
	In regard to flood protection works, it is vitally important that the Fisheries Service is involved at as early a stage as possible for any planned coastal defence or erosion protection works. Any development plans for these areas should be carried out without a negative effect on local fishery amenities.	Environmental protection considerations have been appropriately integrated into flood resilience related action defined within the plan. Climate action defined in the Plan supports the protection and enhancement of biodiversity, including riparian buffer zones and aquatic habitat. It was recommended the local authority has further regard to these comments during plan implementation.	None.	None.
	An on-going challenge for IFI which is particular to summer months when river and stream flows are often low is wide scale unregulated water abstraction. This practice may have significant ecological implications if large volumes of water are abstracted over a short period of time from small nursery or spawning streams. Such abstractions during dry weather or drought periods could have severe repercussions for aquatic habitats, fish stocks and accordingly the ecological status of watercourses in	The Plan does not define any action directly or indirectly supportive of water abstraction. It was recommended the local authority has appropriate regard to these comments generally.	None.	None.

P23-114 www.fehilytimoney.ie — Page 26 of 47

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

The impacts of poorly designed river/stream crossing

structures can be serious in terms of habitat loss.

Prevention of the free upstream migration of fish species such as Salmon, Trout and Lamprey effectively results in the loss of spawning habitat upstream of the barrier to



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	terms of the Water Framework Directive. IFI's key concern in relation to abstractions is that the sourcing of water supplies from groundwater or surface water resources must not result in a negative impact on the ecology (through hydrological mechanisms, absence of groundwater recharge etc.) of those waters, thereby potentially contravening the range of relevant legislation (Fisheries Acts, Habitats Directive, Water Framework Directive etc.).			
	The EPA have an abstraction register which can be accessed at https://www.epa.ie/our-services/licensing/freshwatermarine/water-abstraction/# It is imperative that Local Authorities maintain an abstraction register. IFI would also support a training and information programme for Local Authorities and landowners to sustainable management of watercourses during low flow periods i.e. low flow channels, making sure fish have unobstructed movement within a river system.	The Plan does not define any action directly or indirectly supportive of water abstraction. It was recommended the local authority has appropriate regard to these comments generally.	None.	None.
	One of the stated main objectives of the CAP is to climate proof council infrastructure. Road Drainage should ensure adequate attenuation measures are in place and silt and petrol interceptors, constructed wetlands and swales should be employed where appropriate to reduce pollutants from the road entering watercourses. However, these systems only work when they are properly maintained into the future. IFI encourages a commitment by Local Authorities that all roads and pipelines are constructed in such a manner so as not to pose a threat to surface waters either through pollution, loss of fisheries habitat or through interference with the passage of migratory fish species and/or spawning beds.	At policy level, the Plan supports the protection of the water environment from development and activities supported by defined climate action. Several Environmental Governance Principles have been defined in the Plan which promote environmental protection and enhancement, including biodiversity conservation and water quality protection and improvement. Environmental protection considerations have been appropriately integrated into transport, flood and drainage related development and infrastructure maintenance related action defined in the Plan.	None.	None.

P23-114 www.fehilytimoney.ie Page 27 of 47

implementation.

It was recommended the local authority has further

regard to these comments during plan



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	migration. This could have serious implications for the populations of fish species concerned and contravenes the legal obligation under the WFD to protect the ecological status of river catchments and channels. When structures are being designed for crossing fisheries waters, consideration must be given to the following biological criteria: species of fish required to safely pass; size of fish required to pass (life stage); time of year in which fish passage is required; and high and low design passage flows etc. Bridges and bottomless culverts have the least impact on fish passage. IFI recommends that the CAP should include a clear policy on the use of clear span structures on fisheries waters and that IFI should be consulted on any such proposed developments.			
	There is a zone of influence associated with Greenways/Blueways and these must be considered and planned for in the CAP when promoting active travel. A wildlife corridor system that protects regional diversity should be at the forefront of the Greenway/Blueway planning processes. Fragmentation can occur along riparian corridors if proper planning is not in place. In considering wildlife, the focus should not be solely on the narrow width of the path of the greenway, consider the wider area it may influence such as allowing invasive plant and animal species to spread more easily along the corridor and outcompeting native species.	The Plan supports the protection and enhancement of the biodiversity and water environments from development and activities supported by defined climate action. Several Environmental Governance Principles have been defined in the Plan which promote environmental protection and enhancement, including biodiversity conservation and water quality protection and improvement. Environmental protection considerations have been appropriately integrated into Green Infrastructure development related action defined in the Plan.		
	As stated earlier, riparian areas play a disproportionately large role in filtering out pollutants and sediment from overland surface runoff, flood defence, maintaining biodiversity and for these reasons greenways must not impinge on or degrade the riparian zones. For example, in rural areas where there is more land available, it is better to run a trail just outside the riparian area (perhaps on a topographic bench) and bring it in at strategic places, than to keep it continuously close to a riparian area. IFI have published a revised "Planning for watercourses in the	The Plan promotes the use of Nature Based Solutions and Sustinable Drainage Systems as ways to promote flood resilience. It was noted that SEA Monitoring Framework for the LACAP includes the following Plan target: • Increase linear metres of riparian corridor enhanced with native planting. It is recommended the local authority has further regard to these comments during plan implementation.		

P23-114 www.fehilytimoney.ie — Page 28 of 47 CLIENT:

Tipperary County Council (TCC)
SEA Statement for the Local Authority Climate Action Plan 2024 - 2029 PROJECT NAME:



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	urban environment" which can provide guidance on site specific measures to enhance, protect, rehabilitate.	As a general note, it is recommended the local have appropriate regard for all commentary received from IFI when designing, planning for and delivering site specific projects.		

P23-114 www.fehilytimoney.ie — Page 29 of 47



2.5 SEA and Plan Modifications

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

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

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

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

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

Table 2-5: Plan Action Modifications

Action	Summary of Modification
DZ Opportunity Number 2	The following text has been added to funding/support sources: 'South Tipperary Development Companies and the North Tipperary Development Companies, the Sustainable Energy Communities and the Renewable Electricity Support Scheme.'
DZ Opportunity Number 4	The opportunity below has been amended: 'Enable sustainable renewable energy development, research and development in the area both at the commercial and community scale and advocate for grid capacity enhancement that can accommodate new investment in renewable energy development whilst ensuring that such development adheres to relevant planning and environmental protection criteria.' The following text has been added to the status: 'To be progressed over the lifetime of the Climate Action Plan noting that investment in the national grid capacity is a key dependency.' The following text has been added to funding/support sources: 'South Tipperary Development Companies and the North Tipperary Development Companies, the Sustainable Energy Communities and Transport for Ireland (TFI).'
DZ Opportunity Number 7	The following text has been added to funding/support sources: 'South Tipperary Development Companies and the North Tipperary Development Companies, the Sustainable Energy Communities and Transport for Ireland (TFI).'



	Summary of Modification
DZ Opportunity	The following text has been added to funding/support sources:
Number 8	'South Tipperary Development Companies and the North Tipperary Development Companies, the Sustainable Energy Communities, the Tipperary Education and Training Board.'
DZ Opportunity	The opportunity below has been amended:
Number 9	'Consider the development and implementation of a collaborative/innovative approach to nature-based and biodiversity rich land-use solutions in the area, including opportunities to consider on a catchment (or otherwise) basis to support water quality improvement, carbon capture, peatland restoration, land use diversification and flood risk management.'
DZ Action 4.3	The action below has been amended to be as follow:
	'The Council and partners to explore the feasibility of the development of a renewable energy development in the area with community partnership whilst ensuring that any associated renewable energy development has appropriate regard to planning and environmental protection criteria.'
DZ Action 9.2	The action below has been amended to include carbon capture and peatland restoration:
	'Advocate for funding and supports to support land use diversification, carbon capture, peatland restoration nature-based solutions etc as a viable alternative in this area to help support sustainable income and land use management.'
1.3	The action below has been amended:
	'Prepare and apply a project design stage checklist to enable and demonstrate 'Climate Proofing' of local (local authority-led) capital projects, for example; projects funded under the 'Outdoor Recreation Scheme', 'Active Travel Scheme', 'Urban Regeneration and Development Fund' etc. The intention will be to help guide the incorporation of climate actions such as biodiversity enhancement, carbon capture, walking and cycling, public transport, nature-based solutions, urban greening, rainwater harvesting, renewable energy technology, infrastructure for zero emission vehicles at project design stage etc. Significant cross-boundary projects that are already subject to Climate Change Appraisal are not subject to this process.
	Appropriate regard will be had to environmental protection and opportunities for promoting climate action 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.'
	The tracking measures for this action has been updated:
	Develop 'Climate Proofing Checklist
	Number of projects/developments subject to climate proofing at project development stage.
	Apply 'Climate Proofing Checklist' to assessment of local authority projects subject to Part 8 and Section 177AE (application to An Bord Pleanála).
1.7	The action below has been amended:
	'Climate Action to be addressed in finance management, including:
	(a) Consider if there is a need for a separate Revenue Budget (or some other comparable methodology) to capture Climate Action investment/expenditure
	(b) Review significant income sources to ascertain if it is possible to implement incentive schemes designed to positively incentivise low carbon activity.'
	A new KPI has been added to this action:
	'Review of Finance Management Structure to be complete by Q2 2024.'
1.18	The action below has been amended:
	'To fully utilise the existing networks, forums, relationships, influence and outreach of the Council, though its various services and functions to help relate the Climate Action message to stakeholders and communities and deliver on the collaborative outward facing actions as set out in this LACAP. In this respect, the Council take a leading role in an outward facing committee of stakeholders (Sustainabletipp) focused on the delivery of climate actions'
2.5	The action below has been amended:
	'Implement an enhanced system of annual monitoring of severe weather events, including the associated costs of managing/responding to those events that generated a need for emergency response. Maintain a record of the costs associated with the management of and response to severe weather events.'



Action	Summary of Modification
2.6	The action below has been amended: 'Review the Council's 'Emergency Response Protocol' for severe weather events and 'Risk Register' annually to consider the impacts of climate change and the costs associated with emergency response and remediation works/services to such events, climate risks on the delivery of emergency response services and energy response procedures to severe weather events.'
4.5	The action below has been amended: 'Advocate for both proactive national planning policy and fit for purpose national grid infrastructure in Tipperary that will support the transition to renewable energy and to ensure that local authority planning policy is aligned with national policy change and updates as they relate to national and regional renewable energy/electricity targets, guidance and support schemes.'
5.7	Amended partner column to include: 'South Tipperary Development Companies and the North Tipperary Development Companies'
7.1	The action below has been amended: 'In partnership with the Regional Waste Management Planning Offices, support the delivery of the collaborative actions and measures of the National Waste Management Plan 2024 – 2030 as they relate to circularity and climate action. Support awareness raising by the incorporation of climate action/circular economy awareness into Council-led educational programmes for example museum, libraries programmes, arts, culture and heritage, community development.'
4.1	The action below has been amended: 'Having consideration to the outcome of a feasibility assessment (Action 2.1), the Council shall consider how new development in areas determined to have both a water supply and a water quality constraint (i.e. from climate-related drought, extreme rainfall events etc.), may impact on water quality.'
5.4	The action below has been amended: 'Carry out a review of Section 4 Discharge to Water licenses determine if they are capable of meeting projected climate change related risks such as hydrological changes and water temperature increases, etc.' Tracking measure: Number of Licences reviewed.



3. CONSIDERATION OF ALTERNATIVES

3.1 Introduction

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

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

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

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

3.2 Approach to Developing Reasonable Alternatives

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

- Iterative communication was held between the plan-making and environmental assessment teams to
 identify the various alternative approaches and options being considered to achieve the vision of the plan
 the reduction of GHG emissions at Local Authority organizational level and within the Community in
 support of Climate Action policy. This communication commenced early on during the plan-making process.
- 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:

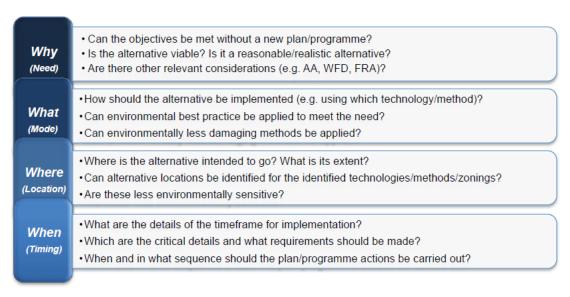


Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3

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.

P23-114 www.fehilytimoney.ie — Page 34 of 47



Table 3-1: Reasonable Alternatives to the LACAP

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

P23-114 www.fehilytimoney.ie Page 35 of 47



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

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

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

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

Tipperary County Council (TCC)
SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



Table 5-1: SEA Monitoring Programme

Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
Overall	01	Ensure, where appropriate, that lower-level plans and projects contribute to overall environmental monitoring processes within the County.	Lower-level plan and project accordance with the plan.	Require all lower-level plans and projects have appropriate regard to and appropriately support all action and development proposals defined in the Plan. Ensure 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 that the implementation of the vision of the Decarbonising Zone minimises negative impacts to the existing economic activities within the area and enables co-benefits in terms of economic development and land use, and that new development complies with land use objectives and development objectives as set out in the Tipperary County Development Plan 2022 - 2028 (and any review thereof).	Compliance of action and development supported by the plan with policies and land use objectives protective/supportive of economic development in the county defined in the County Development Plan (CDP) or County Local Area Plans.	No contravention of policies and land use objectives protective/supportive of economic development in the county defined in the CDP or County Local Area Plans. Planning consent for development proposals supported by the plan only to be granted where development will be carried out in accordance with policies protective/supportive of economic development as set out in the Tipperary County Development plan 2022 - 2028.	Internal monitoring of compliance with CDP Policy Objectives. Internal monitoring of likely significant environmental effects of development projects.
Biodiversity, Flora & Fauna	B1	Ensure Climate Action does not conflict with biodiversity protection, restoration and rehabilitation.	Compliance of action and development supported by the plan with policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the CDP. Condition of habitats impacted by climate change (Area km² /length metres). Number and geographical distribution of Species or Species population trends impacted by climate change.	No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the CDP. Ensure no habitats are impacted by the effects of climate change. Ensure no reduction in the number of geographic distribution of species as a result of climate change effects.	Internal monitoring of compliance with CDP Policy Objectives. Internal monitoring of compliance with the County Biodiversity Action Plan. Internal monitoring of likely significant environmental effects of development projects.

www.fehilytimoney.ie -P23-114 Page 39 of 47

Tipperary County Council (TCC)

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



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
			Compliance of action and development supported by the plan with policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the County's Biodiversity Action Plan.	No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the County's Biodiversity Action Plan. Planning consent for development proposals supported by the plan only to be granted where development complies with policy supporting biodiversity protection and enhancement.	
	B2	Ensure compliance with Habitats and Birds Directives with regard to protection of European Sites and Annexed habitats and species ⁴ .	Condition of European Sites and annexed species.	No adverse impacts on the condition of European Sites and Annexed habitats and species as a result of plan implementation.	Internal monitoring of likely significant environmental effects of development projects. Consultation with the NPWS. Department of Housing, Local Government and Heritage report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive. Department of Housing, Local Government and Heritage's National Birds Directive Monitoring Report for the Birds Directive under Article 12. Review of NPWS publications regarding the status of European sites.
	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,	Condition of features of the landscape which - by virtue of their linear and continuous structure or their function as stepping stones (designated or not) - are of major importance for wild fauna and flora. Linear meters of riparian corridors enhanced with native planting.	No adverse impacts on the condition of features of the landscape which - by virtue of their linear and continuous structure or their function as stepping stones (designated or not) - are of major importance for wild fauna and flora as a result of plan implementation. Increase linear metres of riparian corridor enhanced with native planting.	Internal monitoring of likely significant environmental effects of development projects. Mapping of LR important habitats and species as part of the County Biodiversity Action Plan.

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

P23-114 www.fehilytimoney.ie Page 40 of 47

Tipperary County Council (TCC)
SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
		dispersal and genetic exchange of wild species.	Fragmentation or breaks in continuity of habitats and loss of wildlife corridors, stepping stones and connectivity (km²). Number of developments consented that have significant greenspace proposals.	Reduce habitat fragmentation or breaks. Increase number of developments consented that have significant greenspace proposals.	
	B4	To avoid or minimize significant impacts on semi-natural habitats, species, environmental features, or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed for designation; and to comply with the Wildlife Acts 1976-2012 with regard to listed species.	Condition of semi-natural habitats, species, environmental features or other sustaining resources in designated national sites, nondesignated locally important sites, and sites proposed for designation.	No adverse impacts on condition of seminatural habitats, species, environmental features or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed for designation, as a result of plan implementation.	Internal monitoring of likely significant environmental effects of development projects. Mapping of LR important habitats and species as part of the County Biodiversity Action Plan.
	B5	No net contribution to biodiversity losses or deterioration in response to the biodiversity emergency.	Compliance of development supported by the plan with policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in Chapter 'Green Infrastructure and Biodiversity' of the CDP. No. of developments consented that have significant greenspace proposals. Improved biodiversity areas (Area km² /length metres). Compliance of development supported by the plan with policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the County's Biodiversity Action Plan.	No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in Chapter 'Green Infrastructure and Biodiversity' of the CDP. Increase number of developments consented that have significant greenspace proposals. Increase quantum of improved biodiversity areas. No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the County's Biodiversity Action Plan. Consent for development proposals supported by the plan only to be granted where development complies with policy supportive of biodiversity protection and enhancement.	Internal monitoring of compliance with CDP Policy Objectives. Internal monitoring of compliance with the County Biodiversity Action Plan. Internal monitoring of likely significant environmental effects of development projects.

www.fehilytimoney.ie -P23-114 Page 41 of 47



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
Landscape & Visual Amenity	L1	Avoid or minimise impacts on statutory landscape designations defined in the Tipperary County Development Plan 2022 - 2028 (and any review thereof).	Status of Landscape Character Areas, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects. Number of developments consented that result in avoidable adverse impacts on Landscape Character Areas, High Amenity Zones, Historic Landscape Character Areas and Views and Prospects.	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. 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.	Internal monitoring of compliance with CDP Policy Objectives. Internal monitoring of likely significant environmental effects of development projects. Review of future iterations of the Landscape Character Assessment.
	L2	Avoid or minimise adverse visual effects on residential receptors or other sensitive visual receptors as set out in the Tipperary County Development Plan 2022 - 2028 (and any review thereof).	Number of developments consented that result in avoidable adverse visual impacts on residential receptors or other sensitive visual receptors.	No development supported by the plan should have a significant adverse visual impact on residential receptors or other sensitive visual receptors. All development supported by the plan should adhere to relevant Development Management Standards defined in the CDP, in particular standards defined in relation to physical and visual impacts.	Internal monitoring of likely significant environmental effects of development projects. Review of future iterations of the Landscape Character Assessment.
Cultural Heritage - Archaeology & Architectural	CH1	Avoid impacts upon archaeological heritage (including entries to the Record of Monuments and Places (RMP)) and architectural heritage (including entries to the Record of Protected Structures (RPS) and National Inventory of Architectural Heritage (NIAHs)).	Percentage of features contained in the RMP (and, where relevant, the associated surrounding context) protected from adverse effects due to action and development occurring as a result of this plan. Percentage of features contained in the RPS and NIAH (and, where relevant, the associated surrounding context) protected from adverse effects due to action and development occurring as a result of this plan.	No features contained in the RMP (nor the associated surrounding context) should be significantly adversely affected as a result of the implementation of this plan. No features contained in the RPS and NIAH (nor the associated surrounding context) should be significantly adversely affected as a result of the implementation of this plan.	Internal monitoring of likely significant environmental effects of development projects. Consultation with the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media. Review of Heritage Plan environmental effect monitoring.

P23-114 www.fehilytimoney.ie — Page 42 of 47

Tipperary County Council (TCC)
SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
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 and seek co-benefits where appropriate in line with the objectives of the Tipperary County Development Plan 2022 - 2028 (and any review thereof).	Number of instances of significant adverse impacts on existing land use as a result of plan implementation.	No instances of significant adverse impacts on existing land use as a result of plan implementation.	Internal monitoring of likely significant environmental effects of development projects. Review of Land Use, Land Use Change and Forestry related Greenhouse Gas emissions calculated in the Baseline Emission Inventory.
Air Quality and Noise	AQN1	Increase the number of people travelling to work or school via public transport or by non-mechanical means.	% change in modal split. Length of new sustainable transport routes developed.	Reduction in private car use. Extension and improvement of the sustainable transport network in the plan area.	Central Statistics Office (CSO) Population data - Commuting in Ireland. Internal monitoring of length of new sustainable transport routes developed.
	AQN2	Avoid or minimise effects on local air quality.	Number of developments consented that result in avoidable adverse air quality impacts on sensitive receptors. Number of exceedances of ambient air quality standards in the County, as monitored under the EPA's National Ambient Air Quality Monitoring Network. Improvements in air quality status in the County.	No development supported by the plan should have a significant adverse air quality impact on sensitive receptors. All development supported by the plan should adhere to relevant Development Management Standards defined in the CDP relating to the protection of air quality. Minimise ambient air quality standard exceedances in the County	Internal monitoring of likely significant environmental effects of development projects. Consultation with the EPA. Review of EPA Air Quality Monitoring undertaken in the County. Review of EPA annual 'Air Quality in Ireland' Report.
	AQN3	Avoid or minimise adverse noise impacts.	Number of sensitive receptors exposed to noise nuisance.	No sensitive receptors exposed to nuisance noise in the County.	Internal monitoring of likely significant environmental effects of development projects. Monitoring of internal noise complaint investigations undertaken. Consultation with the EPA.

www.fehilytimoney.ie -P23-114 Page 43 of 47

Tipperary County Council (TCC)
SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
Water	W1	Maintain and/or improve, the quality and status of surface waters.	Status of surface water bodies as reported by the EPA Water Monitoring Programme for the Water Framework Directive (WFD) Status of bathing waters as monitored under the Bathing Water Directive. Number of water bodies achieving High or Good Ecological Status as defined by the WFD within the life-cycle of the Climate Action Plan.	Number of Pollution Incidents detected due to poor bathing water quality results. Not to cause deterioration in the status of any surface water or affect the ability of any surface water to achieve 'good status.' No deterioration in the status of any bathing waters, having appropriate regard to bathing water mandatory and guidelines values defined in the Bathing Water Directive. Implementation of the objectives of the second cycle of the national River Basin Management Plan. Increase in number of water bodies achieving High or Good Ecological Status as defined by the WFD within the lifecycle of the Climate Action Plan.	EPA surface water monitoring data and reports. EPA bathing water monitoring data and reports. Review of environmental quality data detailed in the EPA Maps Application.
	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 lifecycle of the Climate Action Plan.	Internal monitoring of likely significant environmental effects of development projects. Consultation with the EPA.

www.fehilytimoney.ie -P23-114 Page 44 of 47

Tipperary County Council (TCC)
SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	W4	Comply as appropriate with the provisions of the Flood Risk Management Guidelines.	Number of incompatible developments (supported by the plan) consented within flood risk areas.	Minimise developments (supported by the plan) granted permission on lands which pose - or are likely to pose in the future - a significant flood risk, having appropriate regard to the Flood Risk Management guidelines.	Internal monitoring of development projects granted consent.
	W5	Prevent impact upon drinking water quality.	Number of non-compliances with Drinking Water Quality Standards defined in the European Union (Drinking Water) Regulations 2023.	No non-compliances with Drinking Water Quality Standards defined in the European Union (Drinking Water) Regulations 2023.	EPA Drinking Water Quality Reports. Review of environmental quality data detailed in the EPA Maps Application.
Material Assets	MAI1	Avoid or minimise effects on built/amenity assets and infrastructure.	Number of incompatible developments (supported by the plan) adversely affecting built/amenity assets and infrastructure.	No incompatible development (supported by the plan) adversely affecting built/amenity assets and infrastructure.	Internal monitoring of likely significant environmental effects of development projects.
	MAI2	Avoid or minimise effects upon existing and (where known) planned infrastructure.	Number of incompatible developments (supported by the plan) adversely affecting existing or planned infrastructure, including water supply, wastewater management, energy and transport infrastructure.	No incompatible development (supported by the plan) adversely affecting existing or planned material assets infrastructure.	Internal monitoring of likely significant environmental effects of development projects, including monitoring of effects on other future planned or committed material asset infrastructure projects. Consultation with Irish Water, Gas
					Networks Ireland, ESB Networks and Transport Infrastructure Ireland.
	MAI3	Promote sustainable transportation.	% change in modal split. Kilometres of permanent segregated cycling network. Kilometres of permanent integrated cycling network. Number of Electric Vehicle charging points in the county. Total Area of road reallocated for sustainable alternatives (m²).	Percentage increase in the number of public transport users in the County. Increase kilometres of permanent segregated cycling network. Increase kilometres of permanent segregated cycling network. Increase number of Electric Vehicle charging points in the county. Increase Total Area of road reallocated for sustainable alternatives.	CSO Population data - Commuting in Ireland. Internal monitoring of length of new sustainable transport routes developed.

www.fehilytimoney.ie -P23-114 Page 45 of 47

Tipperary County Council (TCC)
SEA Statement for the Local Authority Climate Action Plan 2024 - 2029



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	MAI4	Promote sustainable waste management.	Tonnes of hazardous waste received at Council Waste Management Facilities annually. Tonnes of W.E.E.E. waste received at Council Waste Management Facilities annually. Tonnes of Bulky waste received at Council Waste Management Facilities annually. Tonnes of garden waste received at Council Waste Management Facilities annually.	Increase waste recycling in the County. Reduce waste generation in the County.	EPA Waste Statistics. Consultation with the EPA.
	MAI5	Promote sustainable water use and drainage management.	Level of water use in the County. Compliance with Sustainable Urban Drainage System (SuDS) related development management standards defined in the CDP.	Reduced water use in the county. All development (supported by the plan) must comply with SuDS related development management standards defined in the CDP.	CSO water consumption data. Internal monitoring of flood risk associated with of development projects and development project compliance with relevant flood risk and management related development management standards.
Tourism & Recreation	TR1	Avoid or minimise effects upon tourism and recreation amenities.	Visitor trips to local authority functional area.	Stable or increasing number of visitor trips to local authority functional area.	Fáilte Ireland Data on Tourism Performance.
Climate Change	CF1	Delivery of the necessary action to support the national target of 80% electricity from renewable sources by 2030.	Level of Greenhouse Gas (GHG) emissions in the County. Level of renewable energy infrastructure in the County.	Reduce GHG emissions associated with the Energy sector in the County. Increase the level of renewable energy infrastructure in the County.	EPA National Emission Inventory. Baseline Emission Inventory for the County. Megawatt hour (MWh) output from renewable energy infrastructure in the county.
	CF2	Actively support the delivery of all national climate policy as appropriate to the county with the prioritisation and acceleration of evidence-based measures.	Level of GHG emissions in the County	Reduce GHG emissions for all sectors in the County.	EPA National Emission Inventory. Baseline Emission Inventory for the County.

www.fehilytimoney.ie -P23-114 Page 46 of 47 CLIENT:

Tipperary County Council (TCC)
SEA Statement for the Local Authority Climate Action Plan 2024 - 2029 PROJECT NAME:



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	CF3	CF3: Assist in the delivery of the climate neutrality objective at local and community levels.	Level of GHG emissions in the County. Level of GHG emissions in the Decarbonising Zone. Net addition of tree cover added.	Reduce GHG emission in the County to Net Zero. Reduce Decarbonising Zone GHG emissions to Net Zero. Increase level of tree cover in the County.	EPA National Emission Inventory. Baseline Emission Inventory for the County. Baseline Emission Inventory for the Decarbonising Zone.
	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 consent.	Review of granted planning permissions.

P23-114 www.fehilytimoney.ie — Page 47 of 47



CONSULTANTS IN ENGINEERING, ENVIRONMENTAL SCIENCE & PLANNING

www.fehilytimoney.ie









NSAI Certified



