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PLANNING

LOCAL AUTHORITY CLIMATE ACTION PLAN

Strategic Environmental Assessment Statement

Prepared for:
Clare County Council



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CLARE COUNTY COUNCIL

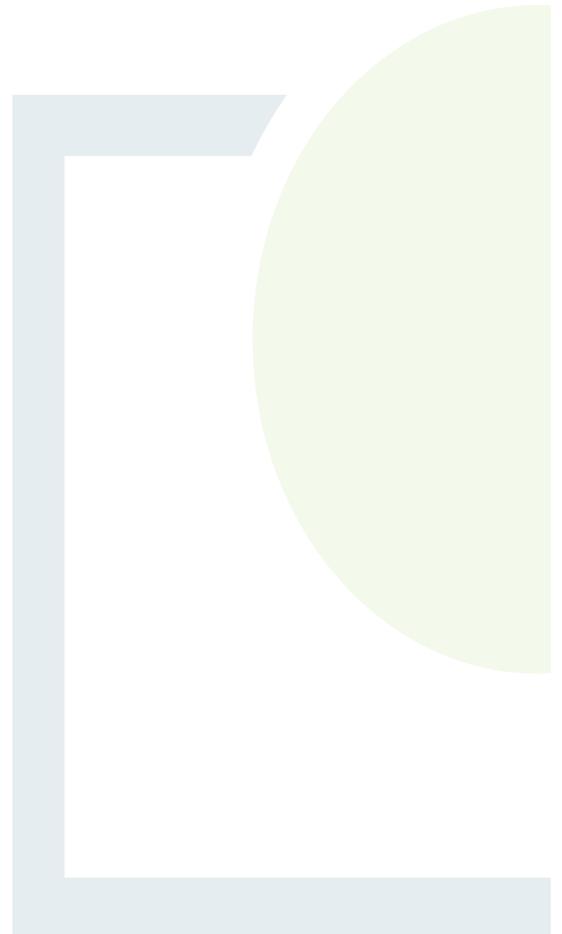
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Abstract: Fehily Timoney and Company is pleased to submit this Strategic Environmental Assessment Statement for the Clare Local Authority Climate Action Plan to Clare for publication alongside the Plan. This Statement provided information on the decision in accordance with Article 16 of S.I. No. 435/2004 - European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (as amended).

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1. INTRODUCTION

1.1 Background

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

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

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

1.2 Legislative Context

SEA is required under the EU Council Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment (the SEA Directive)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'*.

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)



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



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

2.1 SEA Scoping

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

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

A copy of this report was made available to the statutory Environmental Authorities. Environmental Authorities made scoping submissions on the SEA Scoping Report. The SEA Scoping Report was finalized in light of these submissions. The SEA Scoping Report, along with SEA scoping consultation submissions and consideration of these submissions by the SEA process, helped communicate and define the scope of the environmental issues which are to be dealt with by the SEA, the methods which will be used to address these issues, and the level of detail required to address these issues, as per the SEA 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.

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	DAFM note that Commercial sea fishing is a long standing, pre-existing and traditional activity in the marine environment. It is essential that any negative impacts on fisheries are avoided. The evaluation of potential impacts on any commercial sea fishing activities needs to be given consideration as part of any planning/proposal process and during the development process itself. It is imperative that engagement should be sought with the fishing industry and other relevant stakeholders at as early a stage as possible to discuss any changes that may affect them to afford a chance for their input and to put in place avoidance, reduction, and mitigation measures. Fishers' interests and livelihoods must be fully recognised, supported, and taken into account.	The content of this submission served to inform the focus of the environmental assessment of any marine-related action defined in the LACAP. It informed the nature and focus of mitigation measures defined for any action that may result in impacts on sea fisheries in the LACAP.
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	<p>An overview of the nature of climate change challenges was provided. The EPA acknowledged the nature, focus and goals of the emerging LACAP was made. It was advised the SEA should seek to maximize climate action co-benefits for air quality, human health, biodiversity, water quality and other interrelated areas (i.e. win-win solutions).</p> <p>Other measures advised on which were relevant to the SEA included: the need to consider the Plan influence on Greenhouse Gas (GHG emissions) the need to manage climate change influenced invasive species spread, the need to have regard to the receiving water quality and air quality environment during the plan-making process.</p> <p>In relation to the SEA specifically, commentary was provided on the approach to mitigation, and on how the plan should consider impacts on air and water quality, water resource, soils/geology, landscape and material assets.</p> <p>The EPA recommended integrating the environmental mitigation defined under the SEA into the Plan, and advised on other interrelated plans and programmes to consider during plan-making and SEA processes.</p>	<p>The recommendation to ensure climate action defined in the Plan created co-benefits underpinned the SEA process and the defined mitigation measures. Where relevant, mitigation measures ultimately defined serve to holistically maximize environmental benefits. The promotion of climate action co-benefits is embedded into the Environmental Governance Principle framework defined for the Plan.</p> <p>Appropriate regard was had to the need to consider the climate change influenced invasive species spread. This was considered when shaping defined climate action and also within the Environmental Governance principle framework defined under the Plan.</p> <p>The receiving water and air quality environmental were appropriately considered and evaluated during the SEA process, in light of the EPA's commentary on baseline water quality and air quality data and information.</p> <p>The nature, focus and level of mitigation measures defined in the SEA Environmental Report were informed by the EPA's commentary. All mitigation measures defined were integrated into the Plan itself.</p>



Environmental Authority	Summary on the Scoping Consultation Submission	How was this submission taken into account during the SEA?
		<p>The wording of climate action defined in the Plan was shaped having regard to relevant environmental considerations. A set of Environmental Governance Principles were included in the Plan.</p>
<p>Department of the Environment, Climate and Communications</p>	<p>Background information on the Geological Survey of Ireland was provided initially in this submission. An overview of county-level geoheritage and groundwater assets and databases was provided. Information was provided on geological, geotechnical, geothermal, natural resources, geochemistry and geophysical data sources. Specific advice on geological/hydrogeological considerations that needed to be taken into account during the making of the Plan was provided, as follows:</p> <ol style="list-style-type: none"> 1. Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. 2. Geohazards should be considered during the Plan-making and development processes. <p>Sustainable development of our natural resources should be an integral part of all development plans from a national to regional to local level to ensure that the materials required for our society are available when required.</p>	<p>Appropriate regard was had to these baseline geological and hydrogeological data sources and considerations during the preparation of the SEA Environmental Report for the LACAP.</p>
<p>Department of Housing, Local Government and Heritage (DHLGH)</p>	<p>The Department outlined various nature conservation recommendations in relation to key ecological issues of relevance to the plan and its AA and SEA. Key ecological issues relating to Natura 2000 sites, NHAs, National Parks, pNHAs, protected species and natural habitats, salmonid waters, red data book species, and salmonid waters were presented.</p> <p>The Department provided advise on the approach and methodology for completing the AA. They advised the assessment should focus on likely significant effects of the Plan on European sites in view of their conservation objectives. They advised that the AA should be carried out by a suitably qualified ecologist.</p> <p>The Department noted the designated sites falling within the boundary of the selected Decarbonisation Zone. They advise that the NIR should demonstrate that it has considered the likely effects of all aspects of the Plan on European sites.</p>	<p>All key ecological issues identified by the Department were considered during the preparation of the SEA ER and NIR.</p> <p>Baseline biodiversity information was reviewed identified and characterized having appropriate regard to the Department’s commentary in relation to baseline data.</p> <p>The AA for the LACAP was completed in accordance with best practice whilst having appropriate regard to relevant AA Case Law. Appropriate regard was had to European site conservation objectives during the preparation of the AA, including both generic and detailed conservation objectives. The AA was undertaken by a suitably qualified team of ecologists.</p> <p>The AA considered the potential effect of all Plan Action on European sites, including decarbonisation zone related action on European sites in the decarbonisation zone or connected to the decarbonisation. A robust set of environmental mitigation has been integrated into the Plan to ensure the implementation of Plan objectives will not rise to adverse effects on European sites.</p>



Environmental Authority	Summary on the Scoping Consultation Submission	How was this submission taken into account during the SEA?
	<p>They advised that the NIR should conclude with a clear statement on whether or not adverse effects are likely as a result of the Plan on its own, and in combination with other plans and projects. In order to reach such a conclusion, all recommendations of the assessment, including amendments, mitigation measures and monitoring requirements, must be reflected in the content of the Plan itself.</p> <p>They advised the Biodiversity, Flora and Fauna section of the SEA should be undertaken by or in conjunction with a suitably qualified ecologist, and in conjunction with the NIR to ensure full integration of biodiversity issues and concerns, particularly in relation to nature conservation sites, rare and protected species, habitats that are rare or of high ecological value, and Article 10 of the Habitats Directive.</p> <p>They advised that the ER is required to contain environmental protection objectives. For biodiversity, flora and fauna, these should integrate with the objectives and obligations of other directives such as the Habitats and Birds Directives, the Water Framework Directive and the Floods Directive, and with the Wildlife Acts, 1976-2000, National Biodiversity Plan and the aims and objectives of the county's own Heritage Plan and Biodiversity Plan. Strategic environmental objectives should be included for all nature conservation sites (not just Natura 2000 sites), protected species and ecological corridors and stepping stones.</p>	<p>The NIR provides a clear statement that adverse effects on European sites will not occur with the adoption of the proposed mitigation. Environmental mitigation has been integrated into the text of defined climate action.</p> <p>The Biodiversity impact assessment contained in the SEA ER was completed by a suitably qualified ecologist. An integrated biodiversity assessment approach was utilized to ensure harmony between the SEA ER and the NIR, and to ensure a robust assessment of all potential biodiversity impacts.</p> <p>The SEOs indicators and targets defined in the LACAP SEA Monitoring Programme were shaped to ensure they were appropriately reflective of potential environmental effects (positive and negative) that may arise in the local authority functional area due to the implementation of the Plan, including all relevant effects related to biodiversity. SEOs encompassed a wide variety of protected sites as well as non-designated sites of local importance. SEOs were harmonised with existing Plan SEOs (e.g., for the County Development Plan) where appropriate.</p> <p>The suite of environmental mitigation measures defined for the Plan will also serve to prevent significant adverse effects on biodiversity and European sites.</p>



2.2 Environmental Assessment and Mitigation

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

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

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

2.2.1 Mitigation through consideration of alternatives

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

2.2.2 Mitigation through integration of environmental considerations into the LACAP

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

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

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

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



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

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

LACAP Action Reference	LACAP Action	Mitigation Measure
G1.6	Develop strategy/resources to ensure all council-owned buildings are included under a broadened Facilities Management System	Attach the following text to action: "to facilitate upgrading, retrofitting, and increased sustainability of all such buildings."
G2.1	Advance the implementation of climate-related objectives in the County Development Plan	Attach the following text to action: "having due regard to environmental sensitivities such as archaeology, European sites, biodiversity and amenity value."
BE1.1	Conduct Energy Audits across Clare County Council's Significant Energy Users (SEUs) to inform creation of Gap to Target analysis	Attach the following text to action: "with a focus on following-up on targets set."
BE1.4	Completion of Public Lighting Energy Efficiency Project	Attach the following text to action: "while ensuring the lumen levels and spectral range are maintained or reduced/controlled to avoid effects to biodiversity."
BE1.5	Undertake deep retrofitting of Clare County Council facilities through the Pathfinder Programme	Attach the following text to action: "where it is confirmed through appropriate environmental assessment that associated renewable energy development will not have any significant environmental effect."
BE1.6	Develop and Implement energy efficiency projects in Clare County Council owned and operated buildings/assets that deliver on 50% energy efficiency and 51% emissions targets	Attach the following text to action: "having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity, and the need to appropriately protect and conserve protected structures."
BE1.7	Social Housing Stock - Advance Retrofitting programme subject to Dept funding	Attach the following text to action: "having due regard to protected species, biodiversity, European sites and the need to appropriately conserve protected structures."
BE1.8	Implement renewable energy projects in Clare County Council buildings/locations that deliver on energy efficiency and emissions targets	Attach the following text to action: "where it is confirmed through appropriate environmental assessment that associated renewable energy development will not have any significant environmental effect."
BE2.1	Support the development of renewable energy infrastructure and ancillary facilities in order to meet national, regional, and county renewable energy targets through planning policy and land use objectives	Attach the following text to 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."
BE2.2	Support new developments and major renovations to integrate climate into design through the development management process	Attach the following text to action: "having due regard to ensure appropriate environmental protection, including protection of European sites, during the development planning process."



LACAP Action Reference	LACAP Action	Mitigation Measure
BE2.3	Ensure Ennis Local Area Plan and Shannon Local Area Plan integrate and advance climate action	Attach the following text to action: " in a manner that maximises climate action co-benefits and ensure appropriate environmental protection."
BE2.4	Support the implementation of the Shannon Estuary Taskforce Report (including development of Maritime Training Centre of Excellence in Kilrush)	Attach the following text to action: " whilst advocating and exerting influence to ensure supported projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects."
BE2.5	Support upgrade of existing residential and commercial properties to promote sustainable compact growth and regeneration	Attach the following text to action: " having due regard to protected species, biodiversity, European sites, and the need to appropriately conserve protected structures."
BE2.6	Develop feasibility reports into District Heating for Ennis & Shannon	Attach the following text to action: " ensuring such a report as appropriate regard to planning and environmental protection considerations."
BE3.3	Undertake bridge repair programme to safeguard against climate impacts	Attach the following text to 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."
BE3.4	Carry out condition survey of Clarecastle Flood Barrage to inform short, medium, and long-term decision making on future flood strategy	Attach the following text to 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."
BE3.5	Implement the recommendations of the Catchment Flood Risk Assessment and Management Study (CFRAMS) programme as it relates to County Clare and to ensure that flood risk management policies and infrastructure are progressively implemented	Attach the following text to 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."
T1.1	Deliver active travel projects in towns and villages across the county	Attach the following text to action: " having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality, cultural heritage."
T1.2	Advance the delivery of the West Clare Railway Greenway, having due regard to climate resiliency, opportunities to enhance tourism, recreation and cultural heritage value associated with the route, and environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites, and cultural heritage related sensitivities.	Attach the following text to action: " having due regard to opportunities to enhance tourism, recreation and cultural heritage value associated with the route, and environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites, and cultural heritage related sensitivities."



LACAP Action Reference	LACAP Action	Mitigation Measure
T1.3	Complete development of Ennis/Tulla Road, St Flannan's and Lahinch Road active travel projects.	Attach the following text to action: " having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality, cultural heritage ."
T1.4	Develop and adopt an Electric Vehicle Strategy for County Clare	Attach the following text to action: " having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage"
T1.5	Support implementation of Electric Vehicle Strategy to increase electric vehicle charging infrastructure.	Attach the following text to action: " having due regard to ensuring disabled access to EV charging, and environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage."
T1.8	Support the delivery of an efficient and reliable public bus system for Ennis	Attach the following text to 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"
T1.9	Advance the installation of bus shelters at bus stops throughout the county.	Attach the following text to action: " whilst having due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites, cultural heritage."
T1.10	Support the implementation of the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS)	Attach the following text to action: " whilst advocating and exerting influence to ensure projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects."
T1.11	Engage with public transport providers to support enhanced public transport (bus and rail) outcomes including rural bus service expansion and service interconnectivity, whilst advocating and exerting influence to ensure such projects promote climate action benefits and co-benefits, and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.	Attach the following text to action: " whilst advocating and exerting influence to ensure such projects promote climate action benefits and co-benefits, and do not contravene relevant environmental protection criteria or cause significant negative environmental effects."
T2.2	Increase procurement of electric light good vehicles in Clare County Council vehicle fleet	Attach the following text to action: "while ensuring sustainability criteria is appropriately considered during procurement processes and appropriate end-of-life vehicle management practices are in place."
T2.3	Conduct feasibility study and integration of renewable alternative fuel options for Clare County Council vehicle fleet	Attach the following text to action: "ensuring appropriate regard is had to the sustainability of sourced alternative fuels."
C2.5	Support an increase the number of Sustainable Energy Communities established in Clare	Attach the following text to action: " where specific supported energy efficiency and renewable energy projects will not lead to unintended negative environmental effects in a local community."



LACAP Action Reference	LACAP Action	Mitigation Measure
C2.6	Supporting County Clare in transitioning to a more sustainable tourism destination as actioned in the Clare Tourism Strategy 2030 through the measurement and monitoring of sustainable indicators	Attach the following text to action: "whilst having due regard for sensitivities including biodiversity, European sites, cultural heritage, and amenity value."
C2.7	Supporting the engagement of tourism businesses in North Clare with the Geopark Code of Practice for Sustainable Tourism Businesses through the implementation of the Burren and Cliffs of Moher UNESCO Global Geopark's Management Plan 2024 – 2029	Attach the following text to action: "whilst having due regard for sensitivities including biodiversity, European sites, cultural heritage, and amenity value."
C2.8	Support Wetland project within the Ennis 2040 Strategy aimed at increasing biodiversity and sustainability	Attach the following text to action: "with a focus placed on holistically integrating climate action with other environmental considerations, such as biodiversity, air quality or cultural heritage considerations, to promote climate action co-benefits, to ensure win-win benefits are gained."
N1.3	Support and engage with locally and nationally led European Innovation Partnership (EIP) & Priority Action Areas projects in County Clare with biodiversity, climate, and community benefits	Attach the following text to action: "whilst advocating and exerting influence to ensure the scheme and any development and activities promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects."
N1.8	Support and work with landowners to undertake a peatland restoration project	Attach the following text to 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."
N1.10	Develop and implement a policy for the use of chemical pesticides and herbicides across all Clare County Council assets	Attach the following text to 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."
N1.13	Continue to build climate resilience in local architectural heritage through management and administration of the Built Heritage Investment Scheme, Historic Structures Fund, and any other relevant funds introduced.	Attach the following text to 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."
N2.1	Meet annual targets for domestic wastewater treatment systems inspections across County Clare per the EPA National Inspection Plan with a focus on compliance	Attach the following text to action: "while ensuring sustainable transport modes are used to travel to and from inspection sites, where feasible."
N2.2	Undertake inspections to ensure compliance with discharge license requirements	Attach the following text to action: "while ensuring sustainable transport modes are used to travel to and from inspection sites, where feasible."



LACAP Action Reference	LACAP Action	Mitigation Measure
N2.4	Meet annual inspection targets as per the EPA National Agriculture Inspection Plan	Attach the following text to action: "while ensuring sustainable transport modes are used to travel to and from inspection sites, where feasible."
N2.5	Work with Irish Water and LAWPRO (Local Authority Waters Programme) to identify the impacts of critical and vulnerable receptors in accordance with the River Basin Management Plan and Water Framework Directive and support the implementation of all relevant remediation and mitigation measures	Reword to the following: "Work with Irish Water and LAWPRO (Local Authority Waters Programme) to identify the impacts of critical and vulnerable receptors in accordance with the River Basin Management Plan and Water Framework Directive and support the implementation of all relevant remediation and mitigation measures required to maintain or achieve good or high-quality water status in the County."
N2.6	Enable improvements in air quality through inspections of fuel suppliers to address unauthorised sale of unapproved solid fuels	Attach the following text to action: "while ensuring sustainable transport modes are used to travel to and from inspection sites, where feasible."
N2.7	Undertake and expand upon air quality monitoring capabilities	Attach the following text to action: "in accordance with the National Ambient Air Monitoring Programme as well as implementing all relevant recommendations."
N3.2	Investigate the development of composting centres to promote circularity of green waste and support development of community gardens and allotments.	Reword to the following: "Investigate the development of suitably located composting centres to promote circularity of green waste, whilst having due regard to environmental sensitivities such as the receiving human environment, local air quality, biodiversity, European sites, and the existing traffic and transport environment."
DZ		
DZ-BE1	Support the development of a feasibility study for an anaerobic digestion system to produce biogas and organic fertiliser	Attach the following text to action: " whilst ensuring the study as appropriate regard to planning and environmental protection constraints and considerations."
DZ-BE4	Support the upgrading of the wastewater treatment plant in Kilkee	Reword to the following: "Advocate for a suitably located and designed WWTP in Kilkee."
DZ-BE6	Advance the installation of private and community solar PV systems on agriculture, residential, commercial and/or public locations	Attach the following text to action: " where it is confirmed through a glint and glare assessment that such solar development will not have any potential glint and glare impact on sensitive receptors, or otherwise, where it is confirmed that such solar development constitutes exempted development under the Planning and Development Regulations by virtue of its size or location outside a Solar Safeguarding Zone."
DZ-BE8	Undertake energy retrofitting of social housing stock across the DZ	Attach the following text to 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."
DZ-BE10	Advance coverage of Sustainable Energy Communities initiative across all the DZ	Attach the following text to action: "where specific supported energy efficiency and renewable energy projects will not lead to unintended negative environmental effects in a local community."



LACAP Action Reference	LACAP Action	Mitigation Measure
DZ-T1	Advance the delivery of the West Clare Railway Greenway	Attach the following text to action: "having due regard to opportunities to enhance tourism, recreation and cultural heritage value associated with the route, and environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites, and cultural heritage related sensitivities."
DZ-T2	Deliver active travel projects across the DZ	Attach the following text to action: "having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality, cultural heritage."
DZ-T3	Support the installation of electric vehicle charging points across the DZ including Kilkee, Loop Head Lighthouse, Kilrush and Vandeleur Walled Gardens	Attach the following text to the action: "having due regard to ensuring disabled access to EV charging, and environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage."
DZ-T4	Support the installation of community-led electric vehicle charging points across the DZ	Attach the following text to the action: "having due regard to ensuring disabled access to EV charging, and environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage."
DZ-C1	Support the development of local food production and farm enterprises in the DZ (e.g., Loop Head Farm to Fork)	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."
DZ-N2	Support the development of a biodiversity walking and cycling route to enhance and raise awareness of local biodiversity	Attach the following text to the action: "having due regard to environmental sensitivities that may be affected by any built development such as the receiving water environment, biodiversity, European sites, local air quality, and cultural heritage."

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.



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

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

2.3 Appropriate Assessment

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

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

2.4 Consultation on SEA Environmental Report

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

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



Table 2-4: Responses to Consultation Submissions

Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
EPA	<p>You should also consider taking into account the EPA’s ‘Climate Change in the Irish Mind’ project in finalising the Plan. This research is part of the National Dialogue on Climate Action.</p> <p>We suggest that the Plan include a specific action to carry out “implementation monitoring” to ensure that progress achieving the actions and measures across the Plan is being monitored and reported on. 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)</p>	<p>Noted and agreed. It is noted that the SEA Environmental Report (ER) has defined Environmental Governance Principles and action amendment suggestions to ensure climate action co-benefit opportunities are maximized. Various defined mitigation measures serve to promote win-win solutions.</p>	None.	None.
	<p>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.</p>	<p>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.</p>	None	None
	<p>Environmental Authorities Under the SEA Regulations, you should consult with:</p> <ul style="list-style-type: none"> • Environmental Protection Agency; • Minister for Housing, Local Government and Heritage; • Minister for Environment, Climate and Communications; • Minister for Agriculture, Food and the Marine. <p>If you have any queries or need further information in relation to this submission, please contact me directly at c.omahony@epa.ie. I would be grateful if you could send an email confirming receipt of this submission to: sea@epa.ie.</p>	<p>Noted. All listed Environmental Authorities have been consulted with as part of the SEA process.</p> <p>It was recommended the Council confirm receipt of this submission with Cian O’ Mahony, if this hasn’t been done already.</p>	None	None



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Non-Technical Summary</p> <p>You should ensure that the Non Technical Summary includes the relevant information as required under Schedule 2 of S.I No. 434 Of 2004, as amended.</p>	<p>It is assumed that SI No. 434 was a typo and SI No. 435 was what was intended to be addressed with this statement.</p> <p>The requirements of Schedule 2 of SI No 435 have been noted and amendments to the NTS will be made as appropriate.</p>	None	Updated the NTS to reflect the relevant information as required under Schedule 2 of SI No 435 of 2004 as amended.
	<p>Relationship with other plans and programmes</p> <p>We acknowledge that the Plan has been prepared taking account of the key National plans including the National Climate Action Plan 2023. We also acknowledge that the Plan sets out the key plans, programmes and policies considered in preparing the SEA.</p> <p>The Plan should include a commitment to remain aligned with high level plans and programmes, Guidelines, and legislation over its lifetime. The Climate Action Plan 2024 is currently being prepared and work will be commencing on the review of the National Planning Framework and Regional Spatial and Economic Strategies also. Any relevant updates of these plans/strategies should be integrated as appropriate into the Plan as relevant and appropriate.</p> <p>The Plan should include a commitment to consider any relevant updated actions, measures or recommendations that may arise in updates to the National Climate Action Plan (or the National Planning Framework) over the lifetime of the Plan.</p>	<p>Noted and agreed. It was noted that this was in reference to the LACAP and not the SEA ER or AA NIR documentation.</p> <p>It was recommended the Council includes a commitment in the Plan to remain aligned with high level plans and programmes if this isn't the case already.</p> <p>It was recommended the plan includes a commitment in the Plan to consider and appropriately integrate relevant updates to the national Climate Action Plan and National Planning Framework over the lifetime of the Plan.</p>	None	None
	<p>Strategic Environmental Objectives</p> <p>We recommend that in considering strategic environmental objectives, they should where possible reflect the plan being prepared, rather than use more generic environmental objectives. This will help both in considering more specific monitoring and mitigation measures, when required.</p>	<p>Noted. The Strategic Environmental Objectives defined have been very specifically defined to reflect the themes, goals, objectives and climate action contained in the plan and in light of the potential environmental effects associated with Plan implementation.</p>	None	None



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Alternatives We note the alternatives considered in the SEA and acknowledge the preferred option selected.</p>	Noted.	None	None.
	<p>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.</p>	<p>The SEA produced recommended a suite of mitigation measures in response to climate actions considered to have potentially significant environmental effects.</p> <p>Environmental Governance Principles have been defined for the purpose of underpinning and framing the defined climate actions. All activities and development supported by the defined climate actions shall be undertaken or influenced by the local authority, as appropriate, in accordance with these Environmental Governance Principles.</p> <p>Mitigation has also been achieved by the integration of environmental considerations into the defined LACAP climate actions.</p> <p>These mitigation measures have been wholly integrated into the LACAPs.</p> <p>Section 8 of the SEA ER provides full detail of these environmental mitigation measures.</p> <p>It was recommended the Plan provides a clear commitment to implement these mitigation measures, if this isn't the case already.</p>	None	None.
	<p>Monitoring, Implementation & Reporting The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities. If the monitoring identifies adverse impacts during the implementation of the Plan, you should ensure that suitable and effective remedial action is taken.</p>	<p>The SEA Monitoring Programme established for the LACAP is contained in the SEA ER. This monitoring programme has been developed in accordance with EPA guidelines entitled '<i>Guidance on SEA Statements and Monitoring</i>' (2020).</p> <p>The monitoring programme is multi-faceted, broad in scope and has been designed to allow for a flexible and adaptive approach to SEA monitoring during Plan implementation.</p>	None	<p>Updated the SEA monitoring programme to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects arising due to plan implementation.</p> <p>Provided additional detail on monitoring programme data sources</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Guidance on SEA-related monitoring is available on the EPA website at https://www.epa.ie/publications/monitoring--assessment/assessment/strategicenvironmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf</p>	<p>The monitoring programme has been designed to inherently measure cumulative effects that may arise due to the implementation of the Plan.</p> <p>This plan considers both positive and negative effects, as per the following statement from the SEA text:</p> <p><i>'Where monitoring identifies that the implementation of the LACAP is having a significant negative environmental effect, an in-depth review of the LACAP should take place and the LACAP should be updated in a manner that satisfactorily mitigates these environmental effects (i.e., through the adoption of additional environmental mitigation measures.). Similarly, where monitoring indicates that potential positive environmental effects associated with LACAP implementation are not being adequately realized, the LACAP should be reviewed and updated in a manner that supports the realization of all potential positive environmental effects, having regard to the overall vision and high-level objectives of the plan.'</i></p> <p>It 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 to ensure SEOs PHH1, L1, AQN2, TR1 accommodate the monitoring of positive effects arising due to plan implementation.</p> <p>The monitoring programme includes detail on the indicators, targets and data sources to be used to monitor and measure progress. Some additional detail on data sources has however been provided to better guide the SEA monitoring to be carried out across plan implementation.</p>		



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
		A commitment to remedial action in the event SEA monitoring shows the implementation of the Plan was having adverse environmental effects has been made in the SEA.		
	<p>EPA State of the Environment Report</p> <p>Our State of Environment Report, Ireland’s Environment - An Integrated Assessment 2020 (SOER2020) identifies thirteen ‘Key Messages for Ireland’. Delivering Ireland’s long-term sustainable development and environmental objectives will involve many different stakeholders to address these key actions. The report recognises the need for full implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies. The EPA are currently preparing the next iteration of the SOER report, which will be published in 2024. We recommend that a commitment is made in the Plan, to take account of any relevant recommendations in the SOER 2024 report, once published, in implementing the Plan over its lifetime.</p>	<p>Noted.</p> <p>It was recommended the Council make a commitment to take account of any relevant recommendations in the SOER 2024 report, once published, in implementing the Plan over its lifetime.</p>	None	None
	<p>SEA Statement – “Information on the Decision”</p> <p>Once the Plan is adopted, you should prepare an SEA Statement that summarises:</p> <ul style="list-style-type: none"> • 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. 	<p>Noted. An SEA statement has been produced and is being circulated to any environmental authority consulted during the SEA process.</p>	None	None



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.			
	<p>Future Amendments to the Plan</p> <p>You should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan</p>	Noted.	None	None
SEA Fisheries Coordination DAFM	Ireland’s seafood industry (fishing and aquaculture) is one of the key stakeholders operating in the marine area and plays a vital role in the sustainability of our coastal communities. Over 15,000 people are employed around our coast both directly and indirectly. Many of these communities have very limited alternative employment and economic activity options. It is therefore essential that the socio-economic reliance on the seafood sector is fully recognised and is factored into any Climate Change Action plan. Fishing and food security is as key a part of Government Policy. Food Vision 2030 recognises and values the role of primary food producers.	Noted.	None	None.
	The Seafood industry is experiencing a period of difficult change, arising from the ongoing consequences of the EU UK Trade and Co-operation agreement which are specific and impactful on Ireland’s seafood sector. There is now ever-increasing demand on the marine space from Offshore Renewable Energy (ORE), Marine Spatial Planning, Marine Protected Areas (MPAs), and other environmental measures.	Noted.	None	None.
	Our coastal communities and maritime sectors will continue to play a significant role in contributing to our climate goals and will continue to be consulted and supported in the transition to carbon neutrality. The seafood industry, through both the Sectoral Adaptation Plan (Agriculture, Forest and Seafood Climate Change Sectoral Adaptation Plan) and the annual Climate Action Plan (CAP23) continue to support initiatives to improve	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.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>understanding of our marine area and ensure sustainable resource use, including through bio and circular economy initiatives. These plans require consideration in the SEA process.</p> <p>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.</p>	<p>This commentary has been noted. Local authorities in Ireland do not have a direct remit over the fisheries and aquaculture sector. The actions defined in the Plan are however mutually symbiotic and harmonious with the vision and measures defined in European Commission's Communication on the energy transition of the fisheries and aquaculture sector. Insofar as the local authority's remit extends, the plan supports the protection and enhancement of the marine environment. The climate action defined in the plan has the potential to generate multiple climate action benefits, and co-benefits for the water and biodiversity environments and by extension the marine environment (i.e. biodiversity conservation and enhancement, coastal protection, water quality protection and improvements etc.).</p>	<p>Reference was made to the European Commission's Communication on the energy transition of the fisheries and aquaculture sector in Section 3.4 - In-combination effects with Other Plans and Programmes, and Appendix 2 - Relationship with other plans and programmes, as appropriate.</p>	<p>Reference was made to the European Commission's Communication on the energy transition of the fisheries and aquaculture sector in Section 7.3 - Potential Cumulative Effect of the LACAP in combination with other Plans and Projects, and Appendix 1 - Relationship of the Plan with other relevant Plans and Programmes, as appropriate.</p>
	<p>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.</p>	<p>Noted.</p>	<p>None.</p>	<p>None.</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
Department of Housing, Local Government, and Heritage	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 we recommend be taken into account to identify the heritage assets at risk in its area, assess their vulnerability to climate change, increase their resilience and develop disaster risk reduction policies for direct and indirect risks. For example, it is recommended that the strategies should consider:	Noted.	None.	None.
	Identifying the built and archaeological heritage assets in the local authority area including, but not restricted to, structures and sites subject to statutory protection under the National Monuments Acts 1930 to 2014, or the Planning and Development Acts;	The SEA scoping report and SEA Environmental Report identify 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.
	Including objectives to carry out climate change risk assessments, including condition assessments, for the historic structures and sites in its area;	It has been noted that Plan Actions BH1.1 and BH4.5 support the protection of heritage from climate change risk. It is recommended the local authority consider including a specific action to conduct climate change risk assessments 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 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 improve the climate resilience of architectural and archaeological heritage.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	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.
	DHLGH 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
	<p>Nature Conservation</p> <p>Outlined below are the nature conservation recommendations of the Department in relation to key ecological issues of relevance to the Plan and its Appropriate Assessment (AA) and SEA. Previous submissions made by this Department should also be considered with the following.</p> <p>The Department notes the broad objective N1 in the LACAP "Protect, conserve, and enhance County Clare's biodiversity and heritage through the implementation of effective climate related actions" and welcomes the five Biodiversity, Flora & Fauna Strategic Environmental Objectives (SEO's). The Department recommends the following amendments/additions be considered:</p>	Noted.	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>The Department welcomes Strategic Environmental Objective (SEO) B3: ‘Support Article 10 of the Habitats Directive with regard to the management of features of the landscape which by virtue of their linear and continuous structure or their function as stepping stones (designated or not) - are of major importance for wild fauna and flora and essential for the migration, dispersal, and genetic exchange of wild species’. The Department would welcome a commitment to identify and map green infrastructure assets and sites of local biodiversity value over the lifetime of the LACAP. Research has found that hedgerows of low ecological quality are dominant in Ireland. There is an opportunity to improve hedgerow quality for ecological and climate benefits. Establishing a minimum hedge width and longer intervals between cutting of hedges would promote carbon sequestration and biodiversity. This could be done through conditions attached to planning permissions as well as directly by the Local Authority. The Department recommends the inclusion of riparian buffer zones as outlined the Inland Fisheries Ireland Guidance ‘Planning for Watercourses in the Urban Environment (2020)’ when considering new greenways and active travel routes.</p>	<p>Noted. It was recommended that the local authority consider this as appropriate.</p>	<p>None.</p>	<p>None.</p>
	<p>The Department welcomes SEO B4 “To avoid or minimize significant impacts on semi-natural habitats, species, environmental features, or other sustaining resources in designated national sites and to comply with the Wildlife Acts 1976-2012 with regard to listed species”, and recommends that non-designated locally important sites and sites proposed for designation should be included here.</p>	<p>Existing SEOs B1 and B5 serve to monitor the effects on biodiversity generally, inclusive of non-designated locally important sites and sites proposed for designation.</p> <p>It is agreed that reference to monitoring environmental effects on ‘non-designated locally important sites and sites proposed for designation’ could have been expressed more clearly. SEO B4 has been updated appropriately to include this text.</p>	<p>None</p>	<p>Updated SEO 4 to as follows: <i>“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</i></p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
				<i>with regard to listed species."</i>
	<p>The Department welcomes SEO B5 "Go beyond biodiversity protection to deliver biodiversity enhancement, wherever possible, in response to the biodiversity emergency." The Department recommends changing the wording 'go beyond biodiversity protection' to 'no net contribution to biodiversity losses or deterioration' which accords with the wording of Objective 1.1.3 of the National Biodiversity Action Plan 2017 – 2021. This objective requires all Public Authorities and private sector bodies 'move towards no net loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in Blue-Green infrastructure'. The Department considers this wording is more measurable and defined and incorporates the idea of compensation for negative impacts to biodiversity which is sometimes unavoidable. This also helps to avoid confusion between compensation and enhancement measures. The term 'wherever possible' should be removed as it may serve to weaken the LACAP's response to the Biodiversity Emergency.</p>	<p>Noted and agreed. In principle, the SEO with the changed wording retains the same goal to promote and enhance biodiversity in response to the biodiversity emergency.</p>	None.	<p>Update SEO B5 to as follows: <i>'No net contribution to biodiversity losses or deterioration in response to the biodiversity emergency.'</i></p>
	<p>Regarding Objective DZ-BE1 "Support the development of a feasibility study for an anaerobic digestion system to produce biogas and organic fertilizer". Nitrogen deposition is one of the leading causes of global decline in biodiversity alongside changing land use and climate. Intensive agriculture is a major source of nitrogen deposition with vehicular traffic also contributing. Natura 2000 sites (SACs/SPAs), which are intended to protect important habitats and species across Europe, require strict levels of protection to ensure designated features achieve favourable conservation status. Many of these sites are nitrogen-limited, and/or contain sensitive species such as lichens or mosses.</p>	<p>The potential environmental effects of Plan Action supporting the delivery of anaerobic digestion facilities, including potential effects on biodiversity environments have been evaluated and appropriate plan level mitigation has been defined for such actions. In addition Environmental Governance Principle 3, as defined, serves to mitigate the potential effects of development support by Plan Action generally.</p> <p>It was recommended that the local authority should consider the potential effects of nitrogen deposition on biodiversity, as appropriate, during the planning consent process for Anaerobic Digestion facilities.</p>	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>Details of nitrogen deposition mapping and impacts on habitats are included in the Department’s latest Article 17 report. Impacts of nitrogen deposition include acidification and eutrophication resulting in biodiversity loss. The Department would welcome the inclusion of the impact of atmospheric ammonia and nitrogen deposition associated with biogas production / anaerobic digesters on sensitive nature conservation sites as a key consideration in relation to Biodiversity, Flora and Fauna.</p>			
	<p>In section 4.7 of the SEA “The CORINE database is the dominant land use database”. The Department recommends that use should be made of the new National Land Cover Map, available for Ireland, released on 21 March 2023 as an alternative to Corine Landcover Mapping, where possible.</p>	<p>The Geographic Information System (GIS) data used in the preparation of the SEA and AA documents are the most up-to-date, publicly available datasets provided by the EPA website: Download Data (epa.ie).</p>	None	None
	<p>The Department welcomes that the potential to spread invasive species is included as a key consideration in relation to Biodiversity, Flora and Fauna (N1.5). Linear infrastructure project such as active travel routes or electricity cable laying provide an opportunity for invasive species to spread over long distances. The control or management of invasive species should be undertaken in accordance with the two recent TII publications ‘The Management of Invasive Alien Plant Species on National Roads – Standard)1 and ‘The Management of Invasive Alien Plant Species on National Roads – Technical Guidance’.</p>	<p>Noted. It was recommended that the LA considers this as appropriate.</p>	None.	None.
	<p>The inclusion of carbon balance calculations for Renewable Energy Developments, particularly on peatlands should be considered. This should include the alternative scenario of peatland restoration where this is precluded by the development.</p>	<p>Noted. It was recommended that the LA considers this as appropriate.</p>	None.	None.



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	<p>A requirement for all wind and solar farm planning proposals submitted to the planning authority to include a site specific Biodiversity Management Plan (BMP), a plan that clearly outlines the measures and actions required for the protection and enhancement of biodiversity during the operation and decommissioning of the development. The plan should include a detailed programme for monitoring key ecological parameters with clear targets and indicators. This data should be readily accessible and used to inform future solar farm developments. Guidelines, including the guidelines on solar farms recently produced by the NBDC https://pollinators.ie/new-guideline-pollinator-friendly-management-of-solar-farms/ should be consulted.</p>	<p>Noted. It was recommended that the LA considers this as appropriate.</p>	<p>None.</p>	<p>None.</p>
	<p>Regarding the NIR, plan-level mitigation must be demonstrated to be effective in addressing and ameliorating the full range of any adverse effects on the conservation objectives and integrity of European sites that would arise from the plan, or that already exist and may be perpetuated or worsened by the implementation of the plan. Where there is reliance on mitigation measures from other strategies, the Council must ensure that this mitigation suffices and is up-to-date, particularly in respect of the location and extent of European sites, and the details of their conservation objectives, taking the current environmental baseline and pressures into account. Finally, Case law of the CJEU (Case C 258/11, Sweetman and others) has established that the assessment carried out under Article 6(3) cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of a plan/project on a European site.</p>	<p>The NIR has defined a comprehensive set of mitigation measures to prevent Plan Action having a significant adverse effect on European sites. These mitigation measures have been wholly integrated into the plan. The NIR concluded the following: <i>'Having incorporated mitigation measures, it is concluded that the Clare Local Area Climate Action Plan 2024-2029 is not foreseen to give rise to any significant adverse effects on designated European sites, alone or in combination with other plans or projects . This evaluation is made in view of the conservation objectives of the habitats or species, for which these sites have been designated.'</i> It was recommended the Plan provides a clear commitment to implement these mitigation measures if this isn't the case already.</p>	<p>None</p>	<p>None.</p>



Consultee	Submission Text	Detailed Response	Changes to NIR	Changes to SEA ER
	You are requested to send any further communications to this Department's Development Applications Unit (DAU) at referrals@npws.gov.ie, where used, or to the following address: The Manager, Development Applications Unit (DAU), Government Offices, Newtown Road, Wexford Y35 AP90	Noted. It was recommended that the LA sends further communications to the DAU.	None.	None.



2.5 SEA and Plan Modifications

CCC 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.

Table 2-5: Plan Action Modifications

Action	Summary of Modifications
BE1.9	The following new action to be included in the Built Environment section of the LACAP: Undertake a county wide review of built facilities (e.g. trails, car parks, bus stops, public toilets, interpretative centres) enabling visitor and community access to our cultural and natural assets to form the basis for a development plan for the enhancement, monitoring, and adaptive management of such facilities to ensure the sustainable management of the projected increase in demand for access to these assets.
BE3.6	The following new action to be included in the Built Environment section of the LACAP: Municipal Districts to identify areas of concern within the Arterial Drainage network and Surface Water network that result in flooding of roads, properties and public assets with a view to creating a programme for maintenance of specific areas.
BE3.7	The following new action to be included in the Built Environment section of the LACAP: Carry out review of the Flood mapping for the Ennis area to identify areas of risk.
T1.2	The action below has been amended to include the words “climate resiliency”: Advance the delivery of the West Clare Railway Greenway, having due regard to climate resiliency , opportunities to enhance tourism, recreation and cultural heritage value associated with the route, and environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites, and cultural heritage related sensitivities.
T1.3	The action below has been amended to include “St Flannan’s and Lahinch Road”: Complete development of Ennis/Tulla Road, St Flannan’s and Lahinch Road active travel projects.



Action	Summary of Modifications
T1.6	The action below has been amended to include the words “and North Clare Integrated Transport and Traffic Plan” and exclude the words “in accordance with Area Based Transport Assessment guidance”: Complete Ennis Local Transport Plan, Shannon Local Transport Plan and North Clare Integrated Transport and Traffic Plan in accordance with Area Based Transport Assessment guidance.
T1.7	The action below has been amended to exclude the words “residential/urban”: Expand 30km/h speed limit zones to more residential/urban areas of the County.
T1.11	The action below has been amended to include “(bus and rail)”: Engage with public transport providers to support enhanced public transport (bus and rail) outcomes including rural bus service expansion and service interconnectivity, whilst advocating and exerting influence to ensure such projects promote climate action benefits and co-benefits, and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.
T1.12	The following new action is to be included in the Transport section of the LACAP: Support the introduction of interventions that enable the uptake of sustainable transportation in communities across Clare.
T1.13	The following new action is to be included in the Transport section of the LACAP: Undertake research, including engagement and mapping, into best practice street space allocation to support sustainable mobility in Ennis.
T1.14	The following new action is to be included in the Transport section of the LACAP: Collaborate and support Irish Rail and all stakeholders towards resolving the flooding issue at Ballycar.
T1.15	The following new action is to be included in the Transport section of the LACAP: Support and facilitate the opening/reinstatement of railway stations on the Western Railway Corridor within County Clare and in particular at Crusheen.
T1.16	The following new action is to be included in the Transport section of the LACAP: Advance the remediation/development of footpaths across the county to include remediated footpaths and new build footpaths.
C1.4	The action below has been amended to include the words “in particular youth representatives”: Utilise mechanisms of engagement between Clare County Council (CCC) and communities/sectors, in particular youth representatives , with respect to climate action policy and project development.
C2.11	The following new action is to be included in the Communities and Partnership section of the LACAP: Identification of co-benefits associated with climate action in the development of the Climate Action Implementation Plan and where feasible quantification of co-benefits.
N1.14	The following new action is to be included in the Natural Environment section of the LACAP: Research sites of high cultural and natural conservation value along the Clare coast to fully understand the implications of climate change and sea level rise and the potential approaches to mitigation, adaptation and building resilience, with an initial focus on the area of the Loop Head Peninsula which has been identified as a Decarbonisation Zone (DZ).
N1.15	The following new action is to be included in the Natural Environment section of the LACAP: Prioritise vulnerable heritage sites that are identified as being most at risk and determine key actions for their protection through the preparation of Conservation Management Plans.
N2.8	The following new action is to be included in the Natural Environment section of the LACAP: Support the National Parks and Wildlife service (NPWS), communities and other stakeholders in the creation of an MPA network and the designation of specific MPAs off the Clare coastline.
N3.2	The action below has been amended to include the sentence after “green waste”: Investigate the development of suitably located composting centres to promote circularity of green waste and support development of community gardens and allotments.



3. CONSIDERATION OF ALTERNATIVES

3.1 Introduction

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

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

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

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

3.2 Approach to Developing Reasonable Alternatives

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

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



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

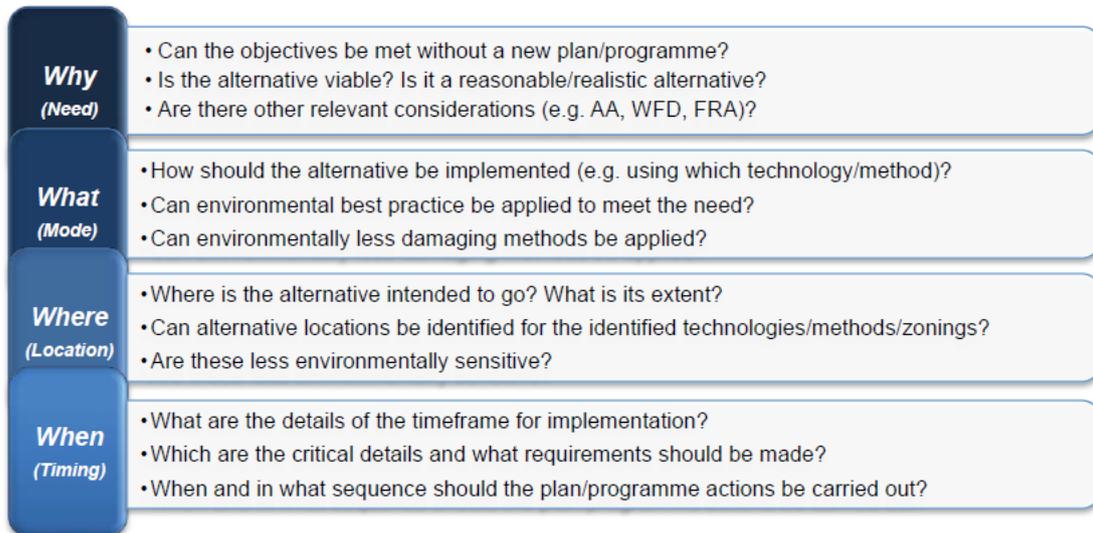


Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3 Developing and Assessing Alternatives in the Strategic Environmental Assessment Process (EPA, 2015).

3.3 Identification and Description of Reasonable Alternatives

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

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



Table 3-1: Reasonable Alternatives to the LACAP

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



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

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

Alternative 1 - The Pareto Approach - would 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 effects, and to be able to undertake appropriate remedial action.'

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

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

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

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

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

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



Table 5-1: SEA Monitoring Programme

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



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

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



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	B3	Support Article 10 of the Habitats Directive with regard to the management of features of the landscape which - by virtue of their linear and continuous structure or their function as stepping stones (designated or not) - are of major importance for wild fauna and flora and essential for the migration, dispersal and genetic exchange of wild species.	<p>Condition of features of the landscape which - by virtue of their linear and continuous structure or their function as stepping stones (designated or not) - are of major importance for wild fauna and flora.</p> <p>Linear meters of riparian corridors enhanced with native planting.</p> <p>Fragmentation or breaks in continuity of habitats and loss of wildlife corridors, stepping stones and connectivity (km²).</p> <p>Number of developments permitted that have significant greenspace proposals.</p>	<p>No adverse impacts on the condition of features of the landscape which - by virtue of their linear and continuous structure or their function as stepping stones (designated or not) - are of major importance for wild fauna and flora as a result of plan implementation.</p> <p>Increase linear metres of riparian corridor enhanced with native planting.</p> <p>Reduce habitat fragmentation or breaks.</p> <p>Increase number of developments permitted that have significant greenspace proposals.</p>	<p>Internal monitoring of likely significant environmental effects of development projects.</p> <p>Mapping of LR important habitats and species as part of the County Biodiversity Action Plan</p>
	B4	To avoid or minimize significant impacts on semi-natural habitats, species, environmental features, or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed for designation; and to comply with the Wildlife Acts 1976-2012 with regard to listed species.	Condition of semi-natural habitats, species, environmental features or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed for designation.	No adverse impacts on condition of semi-natural habitats, species, environmental features or other sustaining resources in designated national sites, non-designated locally important sites, and sites proposed for designation, as a result of plan implementation.	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.	<p>Compliance of development supported by the plan with policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the CDP.</p> <p>No. of developments permitted that have significant greenspace proposals.</p>	<p>No contravention of policies providing for the protection and enhancement of Biodiversity and flora and fauna defined in the CDP.</p> <p>Increase number of developments permitted that have significant greenspace proposals.</p>	<p>Internal monitoring of compliance with CDP Policy Objectives.</p> <p>Internal monitoring of compliance with the County Biodiversity Action Plan.</p> <p>Internal monitoring of likely significant environmental effects of development projects.</p>



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



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



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



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



Environmental Component	SEO Code	Strategic Environmental Objective	Indicators	Targets	Data Source
	W5	Prevent impact upon drinking water quality	Number of non-compliances with Drinking Water Quality Standards defined in the European Union (Drinking Water) Regulations 2023.	No non-compliances with Drinking Water Quality Standards defined in the European Union (Drinking Water) Regulations 2023.	EPA Drinking Water Quality Reports. Review of environmental quality data detailed in the EPA Maps Application.
Material Assets	MAI1	Avoid or minimise effects on built/amenity assets and infrastructure	Number of incompatible developments (supported by the plan) adversely affecting built/amenity assets and infrastructure.	No incompatible development (supported by the plan) adversely affecting built/amenity assets and infrastructure.	Internal monitoring of likely significant environmental effects of development projects.
	MAI2	Avoid or minimise effects 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 (m ²).	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.



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



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 planning consent.	Review of granted planning consents.



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