

CONSULTANTS IN ENGINEERING, ENVIRONMENTAL SCIENCE & PLANNING

### LOCAL AUTHORITY CLIMATE ACTION PLAN

# Appropriate Assessment Conclusion Statement

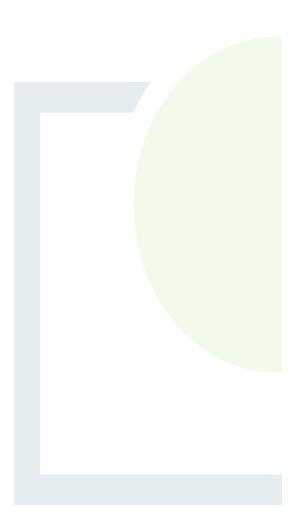
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### APPROPRIATE ASSESSMENT CONCLUSION STATEMENT

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

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- **Keywords:** Appropriate Assessment, AA, AA Conclusion Statement, Natura Impact Report, Local Authority Climate Action Plan.
- Abstract: Fehily Timoney and Company is pleased to submit this Appropriate Assessment Conclusion Statement for the Fingal Local Authority Climate Action Plan to Fingal for publication alongside the Plan.



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#### 1.1 Background

This is the Appropriate Assessment (AA) Conclusion Statement for the Fingal Local Authority Climate Action Plan (LACAP) 2024 - 2029. The obligation to undertake AA derives from Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC as transposed into Irish legislation by the European Communities (Birds and Natural Habitats) Regulations 2011 and the Planning and Development Act 2000, as amended.

AA is a focused and detailed impact assessment of the implications of a strategic action (such as a plan or programme) or project, alone and in combination with other strategic actions and projects, on the integrity of any European Site in view of its conservation objectives.

AA was undertaken for the LACAP. This AA Conclusion Statement documents the AA process applied during the preparation of the LACAP and should be read in conjunction with the LACAP and associated documents including the Natura Impact Report (NIR) for the Plan.

#### **1.2** Requirements in relation to AA Conclusion Statements

Guidelines entitled 'Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities' (2009) published by the then named Department of Environment, Heritage and Local Government recommend that plan-making competent authorities ;include a clear and discrete AA Conclusion Statement as a distinct section in the written statement of the plan separate to the SEA statement.' These guidelines recommend that the following information is included in an AA Conclusion Statement:

- Summary of how the findings of the AA were factored into the plan (provided in Section 2 of this document);
- Reasons for choosing the plan as adopted, in the light of other reasonable alternatives considered as part of the AA process (provided in Section 3 of this document); and,
- A declaration that the plan as adopted will not have an adverse effect on the integrity of a Natura 2000 site or sites (provided in Section 4 of this document.
- Copy of NIR (the NIR was published alongside the AA Conclusion Statement and is available for review).<sup>1</sup>

<sup>1</sup> This NIR provides the following information:



<sup>•</sup> Sufficient detail of the LACAP to make clear its size, scale and objectives.

<sup>•</sup> A description of baseline conditions, conservation objectives, and relevant ecological and environmental issues in relation to relevant European sites that be affected by plan implementation (in the absence of mitigation).

<sup>•</sup> Potential adverse impacts of the Plam on the relevant European sites.

<sup>•</sup> How those environmental effects will be avoided and prevented through mitigation.



#### 2. HOW THE FINDINGS OF THE AA WERE INTEGRATED INTO THE LACAP

#### 2.1 Integrated Biodiversity Assessment Approach

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 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.

#### 2.2 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 - expressly relevant to AA - are presented in Table 2-1.

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 2-2. 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.



The risks to the safeguarding and integrity of the qualifying interests, special conservation interests and conservation objectives of the European sites have been addressed by the inclusion of these mitigation measures.

Multiple actions as originally defined in the Plan will also serve to benefit the biodiversity environment, including a variety of biodiversity enhancement related actions, climate adaptation related actions, and actions designed to reduce GHG emissions and local air pollution.



# Table 2-1: Proposed Environmental Mitigation Measures - Additional text included in Plan actions relating to environmental protection related obligations and environmental enhancement opportunities

Action Reference	Original Action	Recommendations integrated into the Plan, included in:
E14	Targeted LED upgrades across smaller FCC premises, not suitable for EPC	Targeted LED upgrades across smaller FCC premises, not suitable for EPC; ensuring the lumen levels and spectral range are maintained or reduced/controlled to avoid effects to biodiversity.
E16	Renewal of remaining 1.5% of public lighting stock & pitch lighting	Renewal of remaining 1.5% of public lighting stock & pitch lighting; ensuring the lumen levels and spectral range are maintained or reduced/controlled to avoid effects to biodiversity.
E17	Continue to make energy efficiency retrofits to social housing under the DHLGH-supported Energy Retrofit Programme. Ensure FCC's social housing stock has a B2 or cost optimal energy rating where feasible by 2030 (subject to programmes and funding support).	Continue to make energy efficiency retrofits to social housing under the DHLGH-supported Energy Retrofit Programme. Ensure FCC's social housing stock has a B2 or cost optimal energy rating where feasible by 2030 (subject to programmes and funding support); having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity, and the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations.
E18	Complete Pilot programme in Strandmill Estate, Portmarnock, in conjunction with SEAI and REIL offering retrofit upgrades to private homeowners, availing of economies of scale when coupled with public housing upgrades. Partially funded by SEAI government grants.	Complete Pilot programme in Strandmill Estate, Portmarnock, in conjunction with SEAI and REIL offering retrofit upgrades to private homeowners, availing of economies of scale when coupled with public housing upgrades; having due regard to the need to appropriately conserve and maintain any protected structures subject to upgrades in accordance with relevant protected structures regulations, and environmental sensitivities such as local human receptors, European sites and biodiversity. Partially funded by SEAI government grants.
E24	Continue to develop a strategic approach to town centre regeneration through Town Centre First: A Policy Approach for Irish Towns and by utilising existing buildings and unused lands for new development, promote residential occupancy in our rural towns and villages and provide for a mix of uses within these areas.	Continue to develop a strategic approach to town centre regeneration through Town Centre First: A Policy Approach for Irish Towns and by utilising existing buildings and unused lands for new development, promote residential occupancy in our rural towns and villages and provide for a mix of uses within these areas; where doing so would not actively encourage a modal shift toward private car use.
E25	Deliver Blanchardstown District Heating Scheme	Deliver Blanchardstown District Heating Scheme; having due regard to the need to protect sensitive aspects of the receiving environment, such as water bodies, biodiversity, flora and fauna, European sites and local population, from potential negative effects of development, including linear development associated with the project.
E27	Install PV panels on suitable Council roofs such as civic offices, libraries and community buildings	Install PV panels on suitable Council roofs such as civic offices, libraries and community buildings; having due regard to environmental sensitivities such as European sites and biodiversity.
E32	Promote and encourage routine maintenance and good housekeeping to maintain the older building stock of the county in good condition in order to reduce energy	Promote and encourage routine maintenance and good housekeeping to maintain the older building stock of the county in good condition in order to reduce energy consumption and extend the building's life-cycle (e.g. Fingal's Stitch in Time Grant, National Schemes of Built Heritage Investment Scheme, Historic Structures Fund,



Action Reference	Original Action	Recommendations integrated into the Plan, included in:	
	consumption and extend the building's life cycle (e.g., Fingal's Stitch in Time Grant, National Schemes of Built Heritage Investment Scheme, Historic Structures Fund, Community Monument Fund).	Community Monument Fund), having appropriate regard to the need to protect and conserve the architectural or cultural heritage value that may be associated with such buildings, and protected species that may be present in such buildings, and all other environmental sensitivities that may be affected by such works such as European sites and biodiversity.	
T1	Increase the meterage of high-quality walkways in the county and improve the meterage of existing walkways in the county.	Increase the meterage of high-quality walkways in the county and improve the meterage of existing walkways in the county; having due regard to environmental sensitivities such as European sites and biodiversity.	
Τ2	Increase the km of protected cycle lanes and off-road cycle lanes and greenways in the county annually; in line with the Greater Dublin Cycling Network Plan, and the FCC Greenway Plan - including Fingal Coastal Way, the Sutton to Malahide Cycleway, the Broadmeadow Way, Church Fields Link Road, and the Royal Canal Urban Greenway, etc.		
Т3	Deliver/alter infrastructure to improve connectivity/permeability in order to promote active travel	Deliver/alter infrastructure to improve connectivity/permeability in order to promote active travel; having due regard to environmental sensitivities such as European sites and biodiversity.	
Τ4	Deliver new pedestrian / cycling road crossings, which give priority to pedestrians and cyclists. Develop and implement a work programme for the replacement of pedestrian crossings with ones which give priority to pedestrians & cyclists.	Deliver new pedestrian / cycling road crossings, which give priority to pedestrians and cyclists. Develop and implement a work programme for the replacement of pedestrian crossings with ones which give priority to pedestrians & cyclists; having due regard to environmental sensitivities such as European sites and biodiversity.	
T5	Install junction build outs in accordance with Design Manual for Urban Roads & Streets 2020, increasing safety to users.	Install junction build outs in accordance with Design Manual for Urban Roads & Streets 2020, increasing safety to users, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage etc.	
T11	Identify opportunities for reallocation of existing road space to promote active travel and improve public space.	Identify opportunities for reallocation of existing road space to promote active travel and improve public space; having due regard to environmental sensitivities such as European sites and biodiversity.	
T12	Enhancement / reallocation of roads & street space to promote active travel and improve public space. Implement in all 3 LEAs	Enhancement / reallocation of roads & street space to promote active travel and improve public space. Implement in all 3 LEAs; having due regard to environmental sensitivities such as European sites and biodiversity.	
T18	Implement Safe Routes to School programme Implement Safe Routes to School programme, having due regard to environmental sensitiviti human receptors, Biodiversity, European sites, water quality and hydrology, and amenity value		
Т20	Support the development and expansion of existing public transport services including MetroLink, BusConnects and DART expansion to Balbriggan	Support the development and expansion of existing public transport services including MetroLink, BusConnects and DART expansion to Balbriggan, 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.	



Action Reference	Original Action	Recommendations integrated into the Plan, included in:	
T21	To facilitate the provision of Park and Ride facilities in appropriate locations at transport nodes and along strategic transport corridors in accordance with the NTA Strategy and encourage the inclusion of EV charge points and bike parking.	To facilitate the provision of Park and Ride facilities in appropriate locations at transport nodes and along strategic transport corridors in accordance with the NTA Strategy, and encourage the inclusion of EV charge points and bike parking, whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.	
T24	Implement the DLA EVCP strategy through delivery of sufficient EVCP's	Implement the DLA EVCP strategy through delivery of sufficient EVCP's, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage etc.	
T25	Expand availability of EV charging points for Council staff and operational vehicles		
Т26	Provide EV charging infrastructure (in addition to 20% charge points) to development plan standards, for new social housing developed by the Local Authority. Provide Electric vehicle charge points in car parking for new Fingal Corporate buildings.	Provide EV charging infrastructure (in addition to 20% charge points) to development plan standards, for new social housing developed by the Local Authority. Provide Electric vehicle charge points in car parking for new Fingal Corporate buildings. When delivering this action, have due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage etc. when carrying out charging point infrastructure development.	
F4	Develop and implement Coastal Protection Plan for Portrane	Develop and implement Coastal Protection Plan for Portrane; having due regard to the need to promote nature-based solutions and Sustainable Drainage Systems, and environmental sensitivities associated with coastal areas such as the receiving marine environment, biodiversity, European sites, recreation and amenity value etc.	
F5	Progress Flood Alleviation schemes in conjunction with the OPW - including Mill Stream Skerries, Bissett Strand and The Green Malahide Village, Portmarnock Bridge, Green Malahide Village, Portmarnock Bridge, and recreation and amenity value etc.		
F6	Continued engagement with the OPW to progress further studies of areas within Fingal at risk of flooding, and development of suitable schemes such as Strand Road Sutton and Santry	Continued engagement with the OPW to progress further studies of areas within Fingal at risk of flooding, and development of suitable schemes such as Strand Road Sutton and Santry; 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 etc.	



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
F7	Progress appropriate minor works schemes to resolve recurring flood issues, where possible, ensuring the schemes are designed and implemented to promote SUDs / nature-based solutions.	Progress appropriate minor works schemes to resolve recurring flood issues, where possible, ensuring the schemes are designed and implemented to promote SUDs/nature-based solutions/protection of biodiversity and European sites and avoidance of habitat fragmentation.
F11	Restore St Ita's wetlands to maximise water attenuation capacity and nature conservation benefits       Restore St Ita's wetlands to maximise water attenuation capacity and nature conservation benefit due regard to the need to protect other environmental sensitivities. Ensure the works are designed to the need to protect other environmental sensitivities. Ensure the works are designed to the need to protect other environmental sensitivities. Ensure the works are designed to the need to protect other environmental sensitivities. Ensure the works are designed to the need to protect other environmental sensitivities. Ensure the works are designed to the need to protect other environmental sensitivities. Ensure the works are designed to the need to protect other environmental sensitivities. Ensure the works are designed to the need to protect other environmental sensitivities. Ensure the works are designed to the need to protect other environmental sensitivities. Ensure the works are designed to the need to protect other environmental sensitivities. Ensure the works are designed to the need to protect other environmental sensitivities. Ensure the works are designed to the need to protect other environmental sensitivities. Ensure the works are designed to the need to protect other environmental sensitivities. Ensure the works are designed to the sense to the senset sense tother sensitivities. Ensure the sensitivitie	
F17	Ensure the inclusion of water conservation and SuDS measures in all developments, to reduce the level of surface water run-of, improve water quality and contribute to adaptation to climate change through natural based solutions.	Ensure the inclusion of water conservation and SuDS measures in all developments, to reduce the level of surface water run-off, improve water quality and contribute to adaptation to climate change through natural based solutions. Ensure all SuDS related construction works are designed and implemented in a manner that does not result in the occurrence of significant adverse environmental effects and does not result in adverse effects to European sites and biodiversity.
F18	Drive the implementation of SuDS in FCC Capital projects, including new builds, retrofits etc., and monitor the level of implementation.	Drive the implementation of SuDS in FCC Capital projects, including new builds, retrofits etc., and monitor the level of implementation. Ensure all SuDS related construction works are designed and implemented in a manner that does not result in the occurrence of significant adverse environmental effects and does not result in adverse effects to European sites and biodiversity
F26	Use the findings of the Fingal Cultural Heritage & Climate Risk Assessment to prioritise and pilot adaptative and palliative measures for heritage assets in Council ownership	Use the findings of the Fingal Cultural Heritage & Climate Risk Assessment to prioritise and pilot adaptative and palliative measures for heritage assets in Council ownership, having due regard to need to protect and enhance heritage assets, and prevent negative impacts on protected species, including bats.
N4	Develop SUDS demonstration sites in the Tolka Valley, Ward River Valley, Balbriggan town Park and Rogerstown estuary that does not result in the occurrence of significant adverse environmental effects.	
N13	Restore marine ecosystem along Fingal coast by supporting restoration projects of Oyster beds, Shellfish beds, Seagrass beds and Kelp stands	Restore marine ecosystem along Fingal coast by supporting restoration projects - designed, led and implemented by appropriately competent, trained ecologists - of Oyster beds, Shellfish beds, Seagrass beds and Kelp stands; having due regard to environmental sensitivities such as European sites and biodiversity.

# CLIENT: Fingal County Council PROJECT NAME: Local Authority Climate Action Plan SECTION: Appropriate Assessment Conclusion Statement



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
N14	Prepare wetland and river restoration project for the Bog of the Ring and the Matt River corridor	<ul> <li>Prepare wetland and river restoration project for the Bog of the Ring and the Matt River corridor, having due regard to the need to protect other environmental sensitivities, and the need to ensure the works are designed and implemented in a manner that:</li> <li>1. Does not result in the occurrence of significant adverse environmental effects and, 2. Promotes the protection and enhancement of biodiversity.</li> </ul>
R8	Assessment of Construction & Demolition Waste Management Plans for proposed developments to ensure all potential waste streams are identified at an early stage and appropriate measures put in place to promote prevention, reuse, recycling and recovery of waste in line with the waste hierarchy. The segregation and management of different waste streams is also assessed.	Assessment of Construction & Demolition Waste Management Plans for proposed developments to ensure all potential waste streams are identified at an early stage and appropriate measures put in place to promote prevention, reuse, recycling and recovery of waste in line with the waste hierarchy and relevant waste management legislation. The segregation and management of different waste streams is also assessed; having due regard to environmental sensitivities such as European sites and biodiversity, and water and soil quality.
R21	Assess Council lands & buildings for potential for renewable energy, biodiversity; green infrastructure, sustainable agriculture & other sustainable projects.	Assess Council lands & buildings for potential for renewable energy, biodiversity; green infrastructure, sustainable agriculture & other sustainable projects, having appropriate regard to relevant planning and environmental protection criteria.
C10	Promote and support SEAI's Better Energy Communities and Sustainable Energy Communities	Promote and support SEAI's Better Energy Communities and Sustainable Energy Communities, where specific supported energy efficiency and renewable energy projects will not lead to unintended negative environmental effects in a local community.
C12	Involve residents and community groups, e.g., Tidy Towns/community garden groups, in the establishment of newly planted trees in their area, e.g., watering	Involve residents and community groups, e.g., Tidy Towns/community garden groups, in the establishment of newly planted native trees in their area, e.g., watering, having due regards to environmental sensitivities such as European sites and biodiversity.

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

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

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

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

Flood and coastal defense projects, or related maintenance works, shall be carried out in a manner that promotes climate actionbiodiversity 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.



#### 3.1 Introduction

This section provides an over of reasonable Plan alternatives considered during the plan-making processes. The environmental effects of reasonable alternative, including effects on biodiversity and European sites, were considered when choosing the preferred Plan.

#### 3.2 Approach to Developing Reasonable Alternatives

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

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

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

Why (Need)	<ul> <li>Can the objectives be met without a new plan/programme?</li> <li>Is the alternative viable? Is it a reasonable/realistic alternative?</li> <li>Are there other relevant considerations (e.g. AA, WFD, FRA)?</li> </ul>
What (Mode)	<ul> <li>How should the alternative be implemented (e.g. using which technology/method)?</li> <li>Can environmental best practice be applied to meet the need?</li> <li>Can environmentally less damaging methods be applied?</li> </ul>
Where (Location)	<ul> <li>Where is the alternative intended to go? What is its extent?</li> <li>Can alternative locations be identified for the identified technologies/methods/zonings?</li> <li>Are these less environmentally sensitive?</li> </ul>
When (Timing)	<ul> <li>What are the details of the timeframe for implementation?</li> <li>Which are the critical details and what requirements should be made?</li> <li>When and in what sequence should the plan/programme actions be carried out?</li> </ul>

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



#### 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. These alternatives will promote the creation of a range of climate action co-benefits, including potentially co-benefits for biodiversity and European sites.

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. AA CONCLUSION

AA Screening of a draft version of the LACAP (the Draft LACAP) concluded that the Plan was likely to have significant effects on European sites forming part of the Natura 2000 network (in the absence of mitigation), either alone or in combination with other plans and projects.

It was concluded a Natura Impact Report (NIR) should be prepared for the Draft LACAP. Careful considerations were required with regard to the technical wording, focus and scope of the actions contained within the Draft LACAP, such that effects are avoided and/or minimised with regard to European sites and their Qualifying Interests and Special Conservation Interests.

A NIR was produced for the Draft LACAP. The NIR considered the potential for the LACAP to adversely affect the integrity of European sites, with regard to their Qualifying Interests and Special Conservation Interests. The Draft LACAP was informed by the AA and a Natura Impact Report was prepared outlining the likely environmental effects of the Plan on European sites in accordance with the Habitats Directive 92/43/EEC. Measures were integrated into the Draft LACAP that mitigate its potential effects on any European site.

The draft version of this NIR has been consolidated and finalized having regard to the consultation submissions made during the Draft Plan consultation period, recommendations made in the Chief Executive (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 have not changed the parameters of the environmental/ecological assessment undertaken or the environmental mitigation defined.

The Plan modifications arising from the consultation process, the CE Report, and the post consultation planmaking process were screened for AA. The Plan modifications were determined to be non-material and did not introduce any additional environmental/ecological effects not previously considered and mitigated during the SEA and AA processes.

The consolidated, final NIR for the LACAP accompanies this AA Conclusion Statement. The NIR concluded the following:

- Stage 1 AA Screening and Stage 2 AA of the Fingal Local Authority Climate Action Plan 2024-2029 has been carried out. Implementation of the LACAP has the potential to result in effects to the integrity of any European sites, if unmitigated.
- The risks to the safeguarding and integrity of the qualifying interests, special conservation interests and conservation objectives of the European sites have been addressed by the inclusion of mitigation measures that will prioritise the avoidance of effects in the first place and mitigate effects where these cannot be avoided. In addition, all lower-level plans and projects arising through the implementation of the LACAP will themselves be subject to AA when further details of design and location are known.
- In-combination effects from interactions with other plans and projects was considered in the
  assessment and the mitigation measures incorporated into the plan are seen to be robust to ensure
  there will be no significant adverse effects as a result of the implementation of the LACAP either
  alone or in-combination with other plans/projects.
- Having incorporated mitigation measures, it is concluded that the Fingal Local Authority 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.

Having regard to the above, the plan as adopted will not have an adverse effect on the integrity of any European site.



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