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LOCAL AUTHORITY CLIMATE ACTION PLAN

Appropriate Assessment Conclusion Statement

Prepared for:

Limerick City and County Council



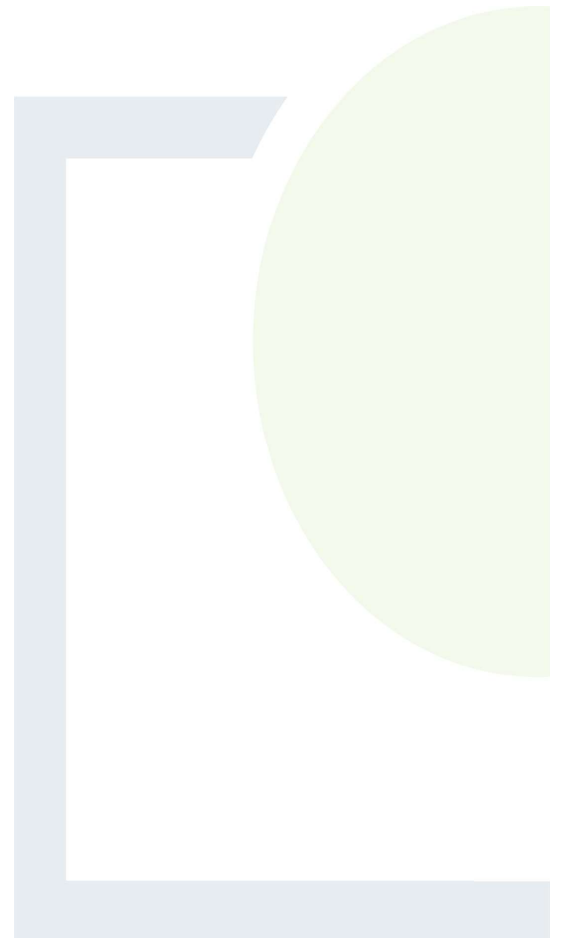
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APPROPRIATE ASSESSMENT CONCLUSION STATEMENT

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Abstract: Fehily Timoney and Company is pleased to submit this Appropriate Assessment Conclusion Statement for the Limerick Local Authority Climate Action Plan to Limerick City and County Council for publication alongside the Plan.

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1. INTRODUCTION

1.1 Background

This is the Appropriate Assessment (AA) Conclusion Statement for the Limerick 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).¹

¹ This NIR provides the following information:

- Sufficient detail of the LACAP to make clear its size, scale and objectives.
- 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).
- Potential adverse impacts of the Plan on the relevant European sites.
- 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:
T1	Increase the use of public transport through the implementation of the bus connects programme	Attach the following text to the action: Promote - through control or influence, as appropriate - project adherence to planning and environmental protection criteria.
T2	Develop and implement a park and ride strategy.	Attach the following text to the action: having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, traffic and transport conditions and cultural heritage.
T3	Examine the feasibility of the provision of new greenways either within disused rail lines or immediately adjacent to existing or proposed rail corridors	Attach the following text to the action: having due regard to environmental sensitivities such as archaeology, European sites, biodiversity and amenity value, and the potential to enhance ecological connectivity.
T4	Implement the Active travel programme in particular the Limerick Metropolitan Cycle Network Study	Attach the following text to the action: having due regard to environmental sensitivities such as archaeology, European sites, biodiversity and amenity value, and the potential to enhance ecological connectivity.
T5	Deliver a network of secure, public bicycle and powered personal transportation parking, to accommodate a variety of bike types across the County, including at schools, parks, playgrounds, towns, and villages.	Attach the following text to the action: having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, and local air quality.
T7	Prepare an EV charging strategy to support city / town centre charging as well as destination charging locations	Attach the following text to the action: having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, and cultural heritage.
T9	Implement an Annual Gulley Cleaning Scheme (AGCS).	Attach the following text to the action: ensuring the plan takes nature-based solutions and protection of biodiversity into consideration.
T10	Implement a bridge rehabilitation programme that is resilient to the impacts of Climate change	Attach the following text to the action: having due regard to the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations, and the need to not negatively impinge on any protected species or European sites.
T11	Carry out maintenance and rehabilitation of regional and local roads in accordance with the guidance document on the climate adaptation of regional and local roads	Attach the following text to the action: having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, and local air quality.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
T12	In road construction projects, minimise the use of virgin materials and promote the use of reclaimed asphalt pavement (RAP) or low carbon alternatives	Attach the following text to the action: Ensure material reuse takes place in accordance with Regulation 27 and 28 of the Waste management Act and materials reused are inert and environmentally non-hazardous.
T14	Assess individual vehicles of the Class (GVW) available in EV format. Ascertain the minimum annual KM to be of benefit as a change from ICE (Internal Combustion Engine) to EV. Agree a fleet replacement plan to comply with SI-381-2021	Attach the following text to the action: whilst ensuring appropriate end-of-life management practices are in place for Electric Vehicles under the ownership of local authorities.
T15	For the vehicles that will not migrate to EV, assess EURO Stage emissions and look at replacements with newer improved emission levels. Alternatively switch from DERV to HVO (Hydrotreated Vegetable Oil) proposed test at Park Rd depot before rolling out to main depots	Attach the following text to the action: Ensure renewable fuels procured by the local authority are sourced from sustainable sources.
T16	Assess depots etc for suitability for EV charging and parking to include potential for solar generation to support charging.	Attach the following text to the action: Ensure development supported by the strategy is delivered in a manner that has due regard to environmental sensitivities (European sites, biodiversity, built heritage, glint and glare impact) and available grid capacity.
B2	Prepare a renewable energy strategy for Limerick incorporating all forms of renewable energy including integrated renewables that will guide the development of new energy infrastructure in the county	Attach the following text to the action: This strategy shall be informed by planning and environmental protection related considerations and constraints.
B3	Implement the Catchment Flood Risk Management (CFRAM) programme across Limerick following the OPW Plans (2016) for Athea, Adare, Askeaton, Croom, Foynes, Newcastlewest, Rathkeale, Castleconnell and Limerick City and Environs	Attach the following text to the action: Ensure due regard is given to promoting Sustainable Drainage Systems, nature-based solutions, and environmental sensitivities, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology.
B4	To support communities to make the transition to EV it is necessary to set out a strategy for the development of a public charging network across the county that is based on site suitability, grid capacity and demand. The strategy will identify both on street and off-street options including the provision of eMaaS hubs.	Attach the following text to the action: Ensure development supported by the strategy is delivered in a manner that has due regard to environmental sensitivities (European sites, biodiversity, built heritage) and available grid capacity.
B7	Support owners of historic building to carry out appropriate retrofitting initiatives by developing guidance and supports	Attach the following text to the action:



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
		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.
B8	Partner with the Chamber of Commerce to encourage businesses to carry out energy efficiency upgrade works to their premises and to reduce their carbon emissions	Attach the following text to the 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.
B9	Implement the Blue Green Infrastructure strategy for Limerick City and Environs whose aim is to inform and guide the planning and management of green and blue spaces in Limerick City and Environs, including our rivers, parks and open green spaces, helping drive the transition to a low carbon and climate resilient society.	Attach the following text to the action: having due regard to opportunities to enhance tourism, recreation and cultural heritage value associated with routes, and environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites, and cultural heritage related sensitivities.
B10	Implement the LSMATS Strategy was prepared by the NTA in collaboration with Limerick City and County Council. The strategy aims to deliver a transport system for the region, which will enable it to become an environmentally sustainable and unified metropolitan unit.	Attach the following text to the action: use influence and control, as appropriate, to promote climate action co-benefits and development project conformance with planning and environmental protection requirements.
B11	Support the implementation of the Shannon Estuary Taskforce Plan sets out recommendations for the delivery of up to 30GW of Atlantic Offshore Wind through the Estuary by 2050, and measures to maximise the industrial development opportunities arising from this.	Attach the following text to the 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.
B16	Install maximum solar PV on appropriate LCCC owned corporate building.	Attach the following text to the action: whilst having due regard to environmental sensitivities (European sites, biodiversity, glint and glare impacts, built heritage).
B17	Start retrofitting Council owned social housing to reduce carbon emissions as well as addressing fuel poverty	Attach the following text to the action: having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity, and the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations.
B18	Make applications to Pathfinder. Pathfinder is a programme operated by SEAI. It provides finance to achieve substantial energy savings by bundling similar large-scale projects. scale projects together. It is operated by SEAI.	Attach the following text to the action: having due regard to environmental sensitivities such as biodiversity, European Sites and sensitive human receptors.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
C9	Utilise the facilities of the CIL and other programmes to encourage communities to form SECs	Attach the following text to the action: Facilitate project adherence to planning and environmental protection requirements.
C9	Utilise the facilities of the CIL and other programmes to encourage communities to form SECs	Attach the following text to the action: Facilitate project adherence to planning and environmental protection requirements.
N1	A local Biodiversity Action Plan will set out measures to protect and enhance local biodiversity, including climate-relevant measures. Implement relevant actions of the national Bio-diversity Action Plan at local level	Attach the following text to the action: having due regard to co-benefit opportunities such the maintenance and improvement of water quality in line with the aims of the Water Framework Directive, or the potential for increasing carbon sequestration levels.
N3	A wetland survey will inform council strategy and planning documents and implement recommendations in terms of conservation and restoration of wetlands.	Attach the following text to the action: having due regard to co-benefit opportunities such the maintenance and improvement of water quality in line with the aims of the Water Framework Directive, or the potential for increasing carbon sequestration levels.
N6	Deliver a habitat protection and creation of new habitats, landscapes, hedgerows strategy	Attach the following text to the action: having due regard to the need to appropriately protect, conserve and enhance important habitats and species and European sites, and support the maintenance and improvement of water quality in line with the aims of the Water Framework Directive. This plan shall be developed by a competent ecology team and shall have due regard to the need to appropriately manage these habitats.
N11	Identify urban areas, towns and villages to be greened (tree planting, pollinators, community gardens, sensory gardens, allotments natural play areas)	Attach the following text to the action: using native species.
N13	Investigate community tree planting and biodiversity enrichment programmes (Mini-Forest initiatives)	Attach the following text to the action: using native species.
N16	Meet annual inspection targets as per EPA National Agriculture Inspection Plan	Attach the following text to the action: while ensuring sustainable transport modes are used to travel to and from inspection sites, where feasible.
E1	Investigate the development of composting centres to promote circularity of green waste	Attach the following text to the action: having due regard to planning and environmental considerations and constraints.
Decarbonising Zone		
	Historic building retrofit programme	Attach the following text to the action:



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	Support the retrofitting of historic buildings through the development of new business models including the establishment of a sustainable investment 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.
	District Heating Idea - Combined waste heat from local sources. Feasibility study required	Attach the following text to the action: Ensure such a report has appropriate regard to planning and environmental protection considerations.
	District Heating at Colbert Station In conjunction with LDA development of the Colbert Quarter support the development of district heating on a community scale.	Attach the following text to the action: Promote - through control and influence as appropriate - development taking place in accordance with relevant planning and environmental protection requirements.
	River turbine +City xChange project has developed a tidal turbine which has obtained planning permission	Attach the following text to the action: Ensure the project adheres to planning permission conditions relating to proper planning, sustainable development and environmental protection.'
	Solar roof top The potential for roof sharing should be examined	Attach the following text to the Action: Due regard shall be had to environmental sensitivities relevant to solar projects, including built heritage, visual impact and biodiversity related sensitivities.
	Freight management delivery and service strategy This is a recommendation in LSMATS. The removal of heavy goods vehicles from the city centre would greatly improve air quality in the city centre	It is recommended that a feasibility study be undertaken to ensure a net improvement to air quality through this action.
	Behavioural Change/Active Travel/Travel planning for workplaces and schools Active travel are continuing to develop and implement a range of initiatives in the areas of safe school, and cycling networks that connect the city	Attach the following text to the action: Ensure the active travel network is planned in a manner that has due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites and cultural heritage.
	Promote and Facilitate EVs Develop an EV charging strategy for the city centre	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.
	Car club - EVs Support the roll out of EV car clubs and infrastructure in 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.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	<p>LSMATS Park and Ride Hubs</p> <p>Hubs at strategic locations outside city to reduce traffic coming into the city.</p>	<p>Attach the following text to the action:</p> <p>Ensure such development promotes climate action co-benefits, including SuDS and nature-based solutions, and does not contravene relevant environmental protection criteria or cause significant negative environmental effects.</p>
	<p>Tree Planting</p> <p>Tree planting offers the potential to address the heat island effect which will become more pronounced as global warming increases. There is potential to increase planting and greening across the city.</p>	<p>Ensure efforts are made to use native Irish trees to support local biodiversity.</p>
	<p>Blue Green Infrastructure</p> <p>The Blue Green Infrastructure delivers a vital role in addressing climate change (e.g. through surface water and flood management, storing greenhouse gases, providing habitats for wildlife) whilst providing a wide range of benefits and supports. The Limerick BGI Strategy presents a road map for its integration across the city and environs.</p>	<p>Attach the following text to the action:</p> <p>having due regard to environmental sensitivities such as archaeology, European sites, biodiversity and amenity value, and the potential to enhance ecological connectivity</p>
	<p>City Flood Relief Scheme</p> <p>The scheme will help protect the biodiversity of the Shannon Estuary</p>	<p>Attach the following text to the action:</p> <p>having due regard to environmental sensitivities such as archaeology, European sites, biodiversity and amenity value, and the potential to enhance ecological connectivity</p>
	<p>Innovation area/R & D park</p> <p>Give support to novel food R & D, including Vertical urban farming, Protein from fermentation</p>	<p>Reword to the following:</p> <p>Give support to sustainable novel food R & D, including Vertical urban farming, Protein from fermentation</p>



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

<p>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.</p>
<p>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.</p>
<p>Ensure local authority development underpinned or supported by plan actions is planned and implemented in a manner that appropriately considers the potential for environmental co-benefits, potential environmental impacts and environmental protection requirements. No local authority climate action related development project that is likely to have significant negative effects on the receiving environment shall be supported.</p>
<p>Promote - through control or influence as appropriate - the carrying out of flood resilience measures underpinned by plan actions in a manner that supports climate action-biodiversity related co-benefits, and which has due regard for the protection and enhancement of rare, protected or important habitats and species.</p>
<p>Promote the carrying out of climate action related projects supported by the plan in a manner that supports climate action-cultural heritage co-benefits, and which has due regard to cultural, archaeological or architectural features and sensitivities.</p>
<p>Promote the carrying out of climate action related projects underpinned by the plan in a manner that supports climate action water quality co-benefits, the achievement of Water Framework Directive objectives, and the protection and maintenance of physical habitat and hydrological processes/regimes.</p>
<p>Promote climate action projects that support protected trees, hedgerows and other habitats such as wetlands, floodzones which contribute to green infrastructure.</p>
<p>Support opportunities to improve ecological connectivity of non-designated habitats and sites to improve overall ecosystem resilience and functioning while supporting climate action within the county.</p>
<p>Ensure local authority projects supported by plan actions have taken the necessary precautions to identify and manage invasives species, particularly with regard to Schedule III species. No local authority climate action related development project that is likely to cause the spread of invasives species listed in Schedule III shall be supported.</p>
<p>Support opportunities to promote peatland restoration, rehabilitation and maintenance while achieving climate targets through the implementation of the climate actions within the plan.</p>



3. CONSIDERATION OF ALTERNATIVES

3.1 Introduction

This section provides an overview 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:

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:
 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.

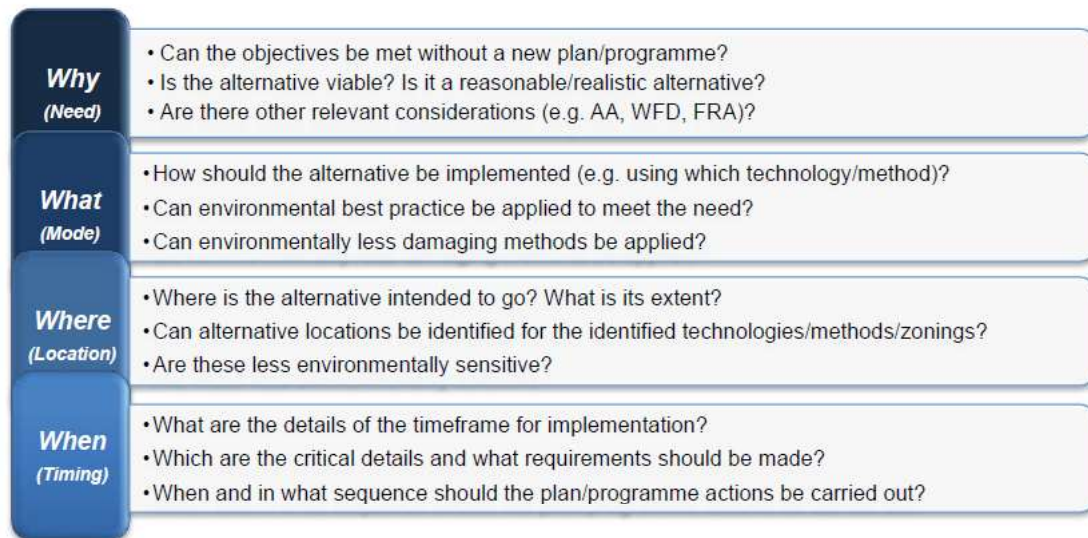


Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3 Developing and Assessing Alternatives in the Strategic Environmental Assessment Process (EPA, 2015).

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.	<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>This alternative will promote the creation of a range of climate action co-benefits, including potentially co-benefits for biodiversity and European sites.</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.	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>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> <p>This alternative will promote the creation of a range of climate action co-benefits, including potentially co-benefits for biodiversity and European sites.</p>



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

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

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

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