



CONSULTANTS IN ENGINEERING,
ENVIRONMENTAL SCIENCE &
PLANNING

LOCAL AUTHORITY CLIMATE ACTION PLAN

Appropriate Assessment Conclusion Statement

Prepared for:
Leitrim County Council



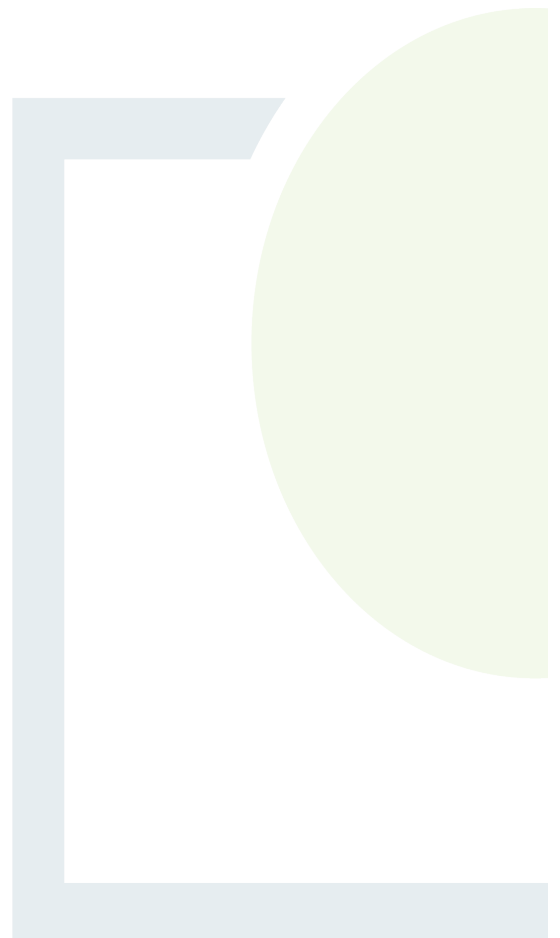
Date: March 2024

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

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

CORK | DUBLIN | CARLOW

www.fehilytimoney.ie



APPROPRIATE ASSESSMENT CONCLUSION STATEMENT

REVISION CONTROL TABLE, CLIENT, KEYWORDS AND ABSTRACT

User is responsible for Checking the Revision Status of This Document

Rev. No.	Description of Changes	Prepared by:	Checked by:	Approved by:	Date:
1	Final	RD/AMW/BF/EW/NSC	RD	AT	13/03/2024

Client: Leitrim County Council

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 Leitrim Local Authority Climate Action Plan to Leitrim for publication alongside the Plan.

TABLE OF CONTENTS

1.	INTRODUCTION	1
1.1	Background.....	1
1.2	Requirements in relation to AA Conclusion Statements.....	1
2.	HOW THE FINDINGS OF THE AA WERE INTEGRATED INTO THE LACAP	2
2.1	Integrated Biodiversity Assessment Approach	2
2.2	Mitigation through integration of environmental considerations into the LACAP.....	2
3.	CONSIDERATION OF ALTERNATIVES	12
3.1	Introduction.....	12
3.2	Approach to Developing Reasonable Alternatives.....	12
3.3	Identification and Description of Reasonable Alternatives.....	13
3.4	Evaluation of Reasonable Alternatives and Reasons for Choosing the Preferred Plan	15
4.	AA CONCLUSION.....	16

LIST OF FIGURES

	<u>Page</u>
Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3 Developing and Assessing Alternatives in the Strategic Environmental Assessment Process (EPA, 2015).....	13

LIST OF TABLES

	<u>Page</u>
Table 2-1: Proposed Environmental Mitigation Measures - Additional text included in Plan actions relating to environmental protection related obligations and environmental enhancement opportunities.....	4
Table 2-2: Proposed Environmental Mitigation Measures - Environmental Governance Principles included in the plan	11
Table 3-1: Reasonable Alternatives to the LACAP.....	14



1. INTRODUCTION

1.1 Background

This is the Appropriate Assessment (AA) Conclusion Statement for the Leitrim 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:
GL19	Enhancement of emphasis on development of social housing on sites near town centres and local facilities.	Attach the following text to the action: Ensure any supported development 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.
GL24	Adopt a cloud technology first approach to reduce the volume of energy used by physical servers and ancillary infrastructure such as cooling systems.	Attach the following text to the action: Steps will be taken to ensure the cloud provider chosen has sustainability- and carbon-goals that align with the overall objective of this plan.
B1	Deliver the Leitrim Pathfinder Programme and pursue other national and regional funding sources for retrofitting and improving energy efficiency and reducing emissions.	Attach the following text to the action: Promote the need to adhere to environmental protection requirements during retrofit projects, including the need to appropriately conserve built heritage.
B5	Deliver the Public Lighting Energy Efficiency Project in County Leitrim as part of PLEEP Scheme to reduce GHG emissions and energy usage of Public Lighting.	Attach the following text to the action: Ensure potential actions maintain/control or reduce existing lumen levels and spectral range to avoid effects on biodiversity.
B7	Endeavour for all new council public buildings to be built to Net Zero Standards as far as practicable.	Attach the following text to the action: having due regard for environmental sensitivities that may be affected by retrofitting works or development, including built heritage, sensitive human receptors and biodiversity.
B8	Use Gap to Target (GTT) Tool to inform decisions and continue retrofitting council owned buildings to reduce emissions such as Electricity, Thermal and Transport and improve energy efficiency	Attach the following text to the action: having due regard for environmental sensitivities such as local human receptors, European sites and biodiversity; and the need to appropriately protect and conserve built heritage.
B9	Facilitate and support the upgrade of existing vacant & derelict residential and commercial properties in Carrick-on-Shannon Town and County through schemes such as Town centre First	Attach the following text to the action: having due regard for environmental sensitivities such as local human receptors, European sites and biodiversity; and the need to appropriately protect and conserve protected structures, during any retrofitting works.
B13	Ensure all Leitrim County Council new build social houses meet minimum A2 Building Energy Rating standard to reduce GHG emissions and Energy consumption	Attach the following text to the action: having due regard to environmental sensitivities that may be affected by supported development, including landscape and visual sensitivities, sensitive human receptors and biodiversity.
B14	Continue retrofitting and upgrading works of existing social housing units to BER B2 rating to reduce GHG emissions, energy consumption	Attach the following text to the action: while having regard to environmental sensitivities such as local human receptors, European sites and biodiversity.
B17	Leitrim County Council will seek to prioritise the delivery of Catchment Flood Risk Assessment and Management (CFRAM) Programme identified flood schemes in the county and promote nature-based solutions and integral to these schemes Prioritise CFRAMS identified flood schemes in Leitrim, priorities:	Attach the following text to the action: in accordance with technical, financial and environmental requirements.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	1. CoS -planning, CoS – construction 2. LV – Planning, LV – construction 3. Mohill -feasibility study, works dependent on outcome 4. Dromod -feasibility study, start dependent on Cos & LV 5. Dromahaire FRS planning	
B19	Pursue maintenance funding for works on resolved local flooding areas	Attach the following text to the action: ensuring the plan takes nature-based solutions and protection of biodiversity into consideration.
B23	Develop a formal routine gulley maintenance and cleaning plan to ensure that programmes are in place in all towns and villages prone to flooding and that all gulley's are cleaned in advance of the Autumn and Winter seasons. Pursue funding for same.	Attach the following text to the action: Ensure the plan takes nature-based solutions and protection of biodiversity into consideration.
B28	Continue to roll out Active-Travel infrastructure maximising available funding from National Transport Authority (NTA).	Attach the following text to the action: having due regard to opportunities to enhance tourism, recreation and cultural heritage value associated with active travel routes, and environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites, and cultural heritage related sensitivities.
B30	Progress the delivery of Greenway / Blueway infrastructure in line with National Cycle Network (NCN). Priority projects at present include: 75km Greenway Sligo Leitrim Northern Counties Railway (SLNCR), 10km Blueway Carrick Carrick-on-on-Shannon to Hartley, 26km Cavan Leitrim Railway Greenway Dromod to Ballinamore, Drumshambo to Ballinamore.	Attach the following text to the 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.
B31	Increase the number of safe routes to school schemes in the county. Promotion of schemes and engagement with Boards Management	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.
B33	Engage with Smart and Sustainable Mobility Accelerator (SSMA) programme to increase knowledge, competencies, and understanding of sustainable and smart mobility supporting the implementation of the National Sustainable Mobility Policy (NSMP) goals and those outlined in the Pathfinder programme; having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.	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.
B34	Develop a Regional EV Strategy for County Leitrim in association with Lead Local Authority & implement actions / recommendation as identified	Attach the following text to the action: Having due regard to the need to ensure disabled access to EV charging infrastructure and environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
B35	Develop a fleet management strategy ensuring alignment to the Leitrim CAP. Evaluate annual mileage of LA grey fleet and associated carbon emissions.	Reword the action to as follows: Develop a fleet management strategy ensuring alignment to the Leitrim CAP and sustainability principles . Evaluate annual mileage of LA grey fleet and associated carbon emissions.
B37	Undertake a decarbonisation strategy for local authority fleet in line with guidance from CCMA, LGMA and SEAI activating the Avoid – Shift – improve model working to the aim of 51% emission reductions by 2030. Implement road map to decarbonisation for LA Fleet.	Reword the action to as follows: Undertake a decarbonisation strategy for local authority fleet in line with guidance from CCMA, LGMA and SEAI activating the Avoid – Shift – improve model working to the aim of 51% emission reductions by 2030. Implement road map towards sustainable decarbonisation for LA Fleet.
B40	Purchase eVs as replacement fleet vehicles where suitable and available on the market in line with decarbonisation strategy	Attach the following text to the action: Whilst ensuring energy/fuel used to power local authority alternative vehicles is sustainably sourced and ensure appropriate end-of-life management practices are in place for local authority owned Electric Vehicles.
B41	Replacement of fuel type for HGV fleet with HVO when the technology and products become available	Reword the action as follows: Replacement of fuel type for HGV fleet with sustainably sourced and certified HVO that delivers lifecycle GHG emission reductions , when the technology and products become available.
B46	Develop, adopt & implement Local Transport Plans for Carrick-on-Shannon with an emphasis on the promotion of sustainable transport modes and modal shift	Attach the following text to the action: having due regard to climate action co-benefit/biodiversity enhancement opportunities and environmental sensitivities that may be impacted by active travel projects.
B48	Design and implement a transportation mobility plan and land-use transportation plan for Carrick-on-Shannon	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, and the need to promote sustainable transport.
N4	Consider a Green Infrastructure Strategy including a green infrastructure network for the County that incorporates ecology, climate change mitigation and adaptation, to increase climate resilience, climate action co-benefits and environmental protection requirements.	Attach the following text to the action: Ensure such a strategy promotes climate action co-benefits and adherence to planning and environmental protection requirements.
N8	Development and Implementation of a SUDS policy and continue the prioritisation of SUDS measures in Local Authority projects ensuring the plan takes nature-based solutions / protection of biodiversity and avoidance of habitat fragmentation into consideration.	Attach the following text to the action: Ensure this policy promotes Nature Based Solutions where appropriate and has due regard to environmental protection requirements.
N9	Develop an awareness raising campaign for the management of native hedgerows and implement recommendations from hedgerow appraisal survey where appropriate.	Reword this action to the following: Develop an awareness raising campaign for the management of native hedgerows and implement recommendations from hedgerow appraisal survey where appropriate.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
N10	Encourage implementation of biodiversity aspects in new and existing social housing estates where possible e.g., green roofs, green walls, wetland and pond SUDS, reed bed waste water filtration, green car parking, nest boxes in facades, grasslands, and wildlife-friendly shrubs and trees in open spaces having appropriate regard to relevant planning and environmental protection criteria.	Attach the following text to the action: with a focus on follow-up and protective/remedial action.
N12	Promote the integrated planning, design and delivery of green infrastructure (including urban greening) through appropriate provisions in planning policies, development standards, infrastructural, public realm and community projects	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.
N15	Develop and implement a pesticide use reduction policy for Leitrim County Council.	Attach the following text to the action: The policy shall also ensure pesticides are only used in accordance with good environmental practice, and only to a degree that does not cause significant effects on the receiving environment, such as the receiving water environment, biodiversity or European sites.
CRT9	Investigate and utilise funds that provide for cycle routes within schools, community facilities, sports and youth clubs	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.
SR9	Progress the authorisation and subsequent remediation of historical landfill sites previously controlled by Leitrim County Council. Ensure the works have appropriate regard to planning, waste management and environmental requirements, considerations and constraints.	Attach the following text to the action: Ensure such remediation projects are properly designed and planned and do not cause unintended negative environmental effects.
SR16	Promotion of diversification in food production through the economic and enterprise remit. Highlight positive benefits of locally grown food.	Reword this action to the following: Promotion of sustainable diversification in food production through the economic and enterprise remit. Highlight positive benefits of sustainably sourced locally grown food.
SR20	Provide technical supports to farming enterprises in the development of biomethane from Anaerobic Digestion, including guidance on planning and environmental protection requirements.	Attach the following text to the action: having due regard to environmental sensitivities that may be affected by the construction and operation of Anaerobic Digestion systems (e.g., water quality, air quality, biodiversity, European sites).
SR21	Support and promote the Signpost Advisory Programme to support climate and sustainability actions on farms	Attach the following text to the action: having due regard to environmental sensitivities in the area such as European Sites, water quality, air quality, and biodiversity related sensitivities.
SR23	Renewable Electricity to be developed in accordance with Leitrim County Councils Renewable Energy Strategy (RES) and the National Renewable Electricity Spatial Policy Framework, to support sustainable development of renewable electricity.	Attach the following text to the action: Promote the proper planning and sustainable development of renewable energy and ancillary grid infrastructure.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
SR24	Support safe, secure, reliable electricity grid infrastructure within the County to support renewable electricity generation, reinforcement, strengthening and integration of the transmission network to allow linkages with renewable electricity proposal consistent with RES.	Attach the following text to the action: Promote the proper planning and sustainable development of renewable energy and ancillary grid infrastructure.
SR25	Support local community-based renewable energy projects and new micro-generation and small-scale generation renewable energy projects	Attach the following text to the action: Promote project adherence to planning and environmental protection requirements.
DZBE1	Retrofit social housing and local authority buildings in the Carrick-on-Shannon DZ to achieve a minimum Building Energy Rating of B2.	Attach the following text to the action: Having due regard for environmental sensitivities such as local human receptors, European sites and biodiversity; and built heritage conservation requirements, during any retrofitting works.
DZBE2	Assess the feasibility of rooftop solar PV on social housing and local authority property across the Carrick-on-Shannon DZ	Attach the following text to the action: having due regard to local human receptors, protected species, biodiversity, European sites and the need to appropriately conserve protected structures.
DZBE3	Install rooftop solar PV on social housing and local authority property across the Carrick-on-Shannon DZ	Attach the following text to the action: having due regard to local human receptors, protected species, biodiversity, European sites and the need to appropriately conserve protected structures.
DZBE4	Promote retrofit to Building Energy Rating B2 for private and commercial properties across the Carrick-on-Shannon DZ	Attach the following text to the action: Having due regard for environmental sensitivities such as local human receptors, European sites and biodiversity; and built heritage conservation requirements, during any retrofitting works.
DZBE6	Consider suitability for solar canopies at LCC car parks	Attach the following text to the action: having due regard to environmental sensitivities such as landscape character and visual amenity, local human receptors, protected species, biodiversity, and European sites.
DZBE8	Utilise available funding to carry out flood protection works and promote the use of Nature-based Solutions (NbS) to reduce the impact of flooding	Attach the following to the action: having due regard to the need to promote nature based solutions and Sustainable Drainage Systems, and environmental sensitivities at and in the vicinity of water bodies, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.
DZBE10	Improve the energy efficiency of historic buildings within the DZ	Attach the following text to the action: having due regard to the built and natural heritage conservation requirements, and the need to not negatively impinge on any protected species.
DZBE11	Complete a Town Centre First Plan for Carrick-on-Shannon and implement recommendations.	Attach the following text to the action: having due regard to protected species, biodiversity, European sites and the need to appropriately conserve protected structures.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
DZT1	Implement the decarbonisation of the Local Authority vehicular fleet as appropriate.	Attach the following text to the action: Ensure energy/fuel used to power local authority alternative vehicles is sustainably sourced, and appropriate end-of-life management practices are in place for Electric Vehicles.
DZT2	Undertake an Active Travel study to identify and prioritise the most effective measures	Attach the following text to the action: ensuring the study has appropriate regard to planning and environmental protection constraints and considerations.
DZT5	Identify suitable locations for EV charging points across the Carrick-on-Shannon DZ	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.
DZT7	Engage with the relevant authorities to support the electrification of Local Link.	Attach the following text to the action: Promote - through control or influence as appropriate - the consideration of sustainability and environmental protection requirements during the design, planning and development of this project.
DZT8	Promote, support & incentivise cycling/walking bus for schools within DZ area.	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.
DZT9	Increase pedestrianised space in Carrick-on-Shannon to encourage active travel	Attach the following text to the action: having appropriate regard to environmental sensitivities such as traffic and transport constraints and aspects, the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.
DZT13	Install cycle routes within 1.5km of all schools, community facilities, sports/ youth clubs in line with Safe Routes to School programme	Attach the following text to the action: having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality and cultural heritage.
DZNGI1	Develop a green infrastructure masterplan for Carrick-on-Shannon to coordinate planning for and enhancement of the natural environment, biodiversity and green areas	Attach the following text to the action: having due regard for environmental protection considerations and opportunities for climate action co-benefits.
GZNGI4	Support the creation of public and connected green spaces in Carrick-on-Shannon to enhance health and wellbeing and biodiversity	Attach the following text to the action: having due regard for planning and development policy and environmental protection considerations during the masterplanning and development process.
DZNGI5	Support green infrastructure and nature-based solutions such as sustainable urban drainage systems to improve climate resilience	Attach the following text to the action: having due regard to environmental sensitivities including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.
DZNGI6	Promote rain-water harvesting, reuse of grey water and green roofs and walls.	Attach the following text to the action: Having due regard for environmental sensitivities such as local human receptors, European sites and biodiversity; and built heritage conservation requirements, during any retrofitting works.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
DZNGI9	Develop and implement a pesticide reduction policy for Carrick-on-Shannon in line with All Island Pollinator Plan	Attach the following text to the action: The policy shall also ensure pesticides are only used in accordance with good environmental practice, and only to a degree that does not cause significant effects on the receiving environment, such as the receiving water environment, biodiversity or European sites.
DZCRT6	Hold an annual event to promote retrofitting of private buildings and increase community understanding of climate action	Amend the action as per text below: Hold an annual event to promote appropriate retrofitting of private buildings
DZSRM1	Upgrade all public lighting in Carrick-on-Shannon to Light Emitting Diode (LED) lights to improve energy efficiency	Attach the following text to the action: while ensuring the lumen levels and spectral range are maintained or reduced/controlled to avoid effects to biodiversity.
DZSRM5	Support the development of sustainable and circular economy infrastructure	Attach the following text to the action: whilst ensuring such infrastructure is appropriately located and designed, and operates in accordance with the provisions of the Waste Management Act or Industrial Emissions related legislation, and in a manner that does not cause negative environmental impacts or localized nuisance.
DZSRM8	Undertake a feasibility study of the potential for district heating for Carrick-on-Shannon	Attach the following text to the action: ensuring this study has appropriate regard to planning and environmental protection considerations.
DZSRM10	Undertake a feasibility study on the potential for Anaerobic Digestion (AD) in the vicinity of Carrick-on-Shannon utilising waste resources to produce biomethane.	Reword the action to the following: Undertake a feasibility study on the potential for Anaerobic Digestion (AD) at an appropriate location in the vicinity of Carrick-on-Shannon utilising waste resources to produce biomethane. Ensure this study has appropriate regard to planning, waste management and environmental protection related considerations.
DZSRM11	Assess the potential for utilising the Shannon River to produce renewable electricity	Attach the following text to the action: Carefully consider all environmental sensitivities and protection requirements related to such a project during this assessment.



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 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.

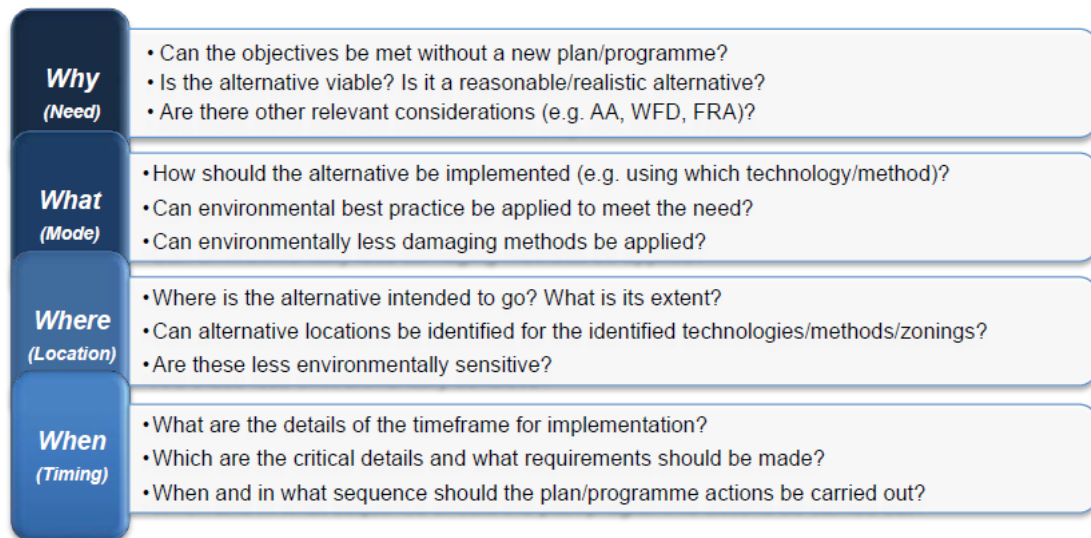


Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3 Developing and Assessing Alternatives in the Strategic Environmental Assessment Process (EPA, 2015).

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>This alternative will promote the creation of a range of climate action co-benefits, including potentially co-benefits for biodiversity and European sites.</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> <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 result 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 Report on submissions received during public consultation of the draft plan, 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 report on submissions received during public consultation of the draft plan, 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 Leitrim 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 Leitrim 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.

All potential effects that may be transmitted to European sites in Northern Ireland will also be appropriately mitigated with the adoption of the defined mitigation. Mitigation measures have been adopted to ensure that the environmental effects of Plan Action are controlled at the source. Thus, it can be concluded that the LACAP is not foreseen to have any significant adverse effects on designated European sites situated in Northern Ireland, alone or in combination with other plans or projects.



**CONSULTANTS IN ENGINEERING,
ENVIRONMENTAL SCIENCE
& PLANNING**

www.fehilytimoney.ie

 **Cork**

 **Dublin**

 **Carlow**

