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SOUTH DUBLIN LOCAL AUTHORITY CLIMATE ACTION PLAN

Appropriate Assessment Conclusion Statement

Prepared for:

South Dublin County Council



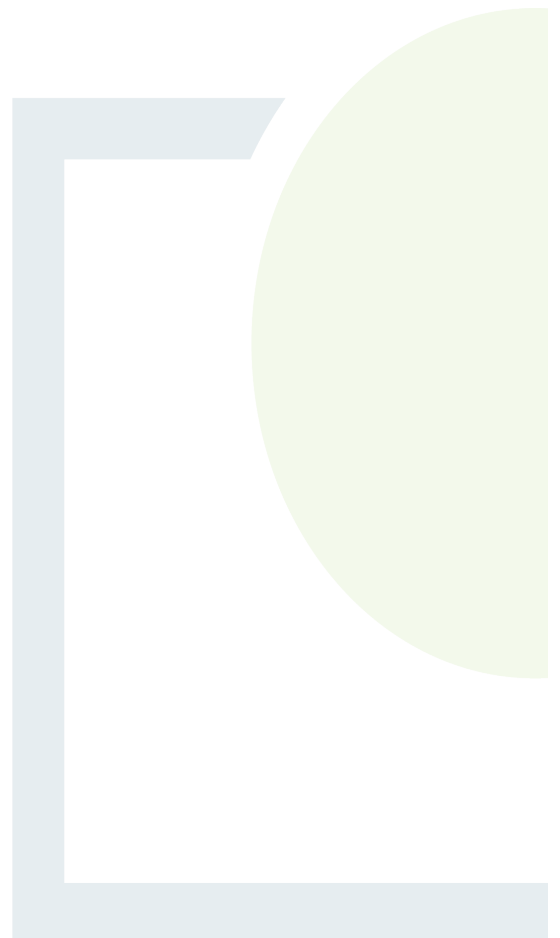
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APPROPRIATE ASSESSMENT CONCLUSION STATEMENT

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

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1. INTRODUCTION

1.1 Background

This is the Appropriate Assessment (AA) Conclusion Statement for the South Dublin 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 - 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:
E3	Complete the Public Lighting SOX Upgrade Programme, for the replacement of all SOX (low pressure sodium lamps) with energy efficient LEDs.	Complete the Public Lighting SOX Upgrade Programme, for the replacement of all SOX (low pressure sodium lamps) with energy efficient LEDs; while ensuring the augmented light features have lumen levels and spectral range consistent with existing or reduced/controlled to avoid effects to biodiversity.
E4	Complete the Public Lighting SON Upgrade Programme, for the replacement of all SON (high pressure sodium lamps) with energy efficient LEDs.	Complete the Public Lighting SON Upgrade Programme, for the replacement of all SON (high pressure sodium lamps) with energy efficient LEDs; while ensuring the augmented light features have lumen levels and spectral range consistent with existing or reduced/controlled to avoid effects to biodiversity.
E10	Retrofits of the Council's housing stock, prioritising energy efficiency upgrades in areas that have been identified in the Dublin Region Energy Masterplan as being energy poor.	Retrofits of the Council's housing stock, prioritising energy efficiency upgrades in areas that have been identified in the Dublin Region Energy Masterplan as being energy poor, 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.
E11	Develop tenant energy awareness toolkit to provide climate /energy awareness and training for the operation of the new energy systems installed.	N/A
E12	Develop the sensitive retrofit of historic/protected structures across South Dublin with the aim of improving energy efficiency and building climate resilience.	Develop the sensitive retrofit of historic/protected structures across South Dublin with the aim of improving energy efficiency and building climate resilience, 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.
E13	Identify and progress opportunities to improve energy efficiencies in Tallaght Stadium and SDCC sports grounds with external floodlights.	Identify and progress opportunities to improve energy efficiencies in Tallaght Stadium and SDCC sports grounds with external floodlights, while ensuring the augmented light features have lumen levels and spectral range consistent with existing or reduced/controlled to avoid effects to biodiversity
E14	Install Solar PV on suitable SDCC owned buildings, focusing on Community Centres and Libraries, and examine the potential for installation on other assets.	Install Solar PV on suitable SDCC owned buildings, focusing on Community Centres and Libraries, and examine the potential for installation on other assets; where it is confirmed through a glint and glare assessment that such solar development will not have any potential glint and glare impact on sensitive receptors, or otherwise, where it is confirmed that such solar development constitutes exempted development under the Planning and Development Regulations by virtue of its size or location outside a Solar Safeguarding Zone.
E15	Investigate opportunities to install solar panels at Depots (roofs / solar car port etc.), with the aim of supplying renewable energy to offset the expected increase in	Investigate opportunities to install solar panels at Depots (roofs / solar car port etc.), with the aim of supplying renewable energy to offset the expected increase in consumption due to the planned fleet decarbonisation and associated EV charging; where it is confirmed through a glint and glare assessment that such solar development will not have any potential glint and glare impact on sensitive receptors, or otherwise, where it



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	consumption due to the planned fleet decarbonisation and associated EV charging.	is confirmed that such solar development constitutes exempted development under the Planning and Development Regulations by virtue of its size or location outside a Solar Safeguarding Zone.
E16	Maintain the operation and monitoring of the Tallaght District Heating Scheme and progress the further expansion of Tallaght District Heating scheme.	Maintain the operation and monitoring of the Tallaght District Heating Scheme and progress the further expansion of Tallaght 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.
E18	Deliver Arthurstown Landfill Solar PV Project to generate renewable energy for consumption on site.	Deliver Arthurstown Landfill Solar PV Project to generate renewable energy for consumption on site; where it is confirmed through a glint and glare assessment that such solar development will not have any potential glint and glare impact on sensitive receptors, or otherwise, where it is confirmed that such solar development constitutes exempted development under the Planning and Development Regulations by virtue of its size or location outside a Solar Safeguarding Zone; and having due regard to the need to protect sensitive aspects of the receiving environment, such as soils, water bodies, biodiversity and the local population, from potential negative effects of works and development associated with the project.
E19	Investigate the feasibility of developing a commercial scale Solar PV plant at Arthurstown Landfill site and look to progress any feasible recommendations.	Investigate the feasibility of developing a commercial scale Solar PV plant at Arthurstown Landfill site and look to progress any feasible recommendations; having appropriate regard to planning and environmental protection criteria.
E20	Identify sites or opportunities for trialing renewable energy projects including but not limited to solar, wind, hydro and pumped storage	Identify sites or opportunities for trialing renewable energy projects, having appropriate regard to planning and environmental protection criteria.
GOV3	Ensure that all new SDCC Projects are assessed for the feasibility of incorporating climate actions and measures, with a focus on energy, greenhouse gas emissions, nature-based SuDS, enhancing and retaining Green Infrastructure, biodiversity, sustainable transport and modal shift, and EV charging, and environmental protection and co-benefits.	Ensure that all new SDCC Projects are assessed for the feasibility of incorporating climate actions and measures, with a focus on energy, greenhouse gas emissions, nature-based SuDS, enhancing and retaining Green Infrastructure, biodiversity, sustainable transport and modal shift, EV charging and environmental protection and co-benefits.
F5	Progress Flood Alleviation schemes in conjunction with the OPW - including the River Poddle FAS, the River Camac FAS and the Whitechurch Stream FAS.	Progress Flood Alleviation schemes in the county in conjunction with the Office of Public Works (OPW); 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.
F6	Progress appropriate minor works schemes to resolve recurring flood issues, where possible, ensuring the schemes	Identify and progress minor works schemes to resolve recurring flood issues, where possible, ensuring the schemes are designed and implemented to include Sustainable Urban Drainage Systems (SUDS) / nature-based solutions/ protection of biodiversity and avoidance of habitat fragmentation.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	are designed and implemented to promote SuDS / nature-based solutions.	
F8	Drive the implementation of SuDS in SDCC Capital projects, including new builds, retrofits etc., and monitor the level of implementation.	Drive the implementation of SuDS in SDCC 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.
F11	Promote and encourage the implementation of SuDS to external Developers - ensure implementation of SuDS in Planning applications in line with SDCC SuDs Guidance.	Promote and encourage the implementation of SuDS to external Developers - ensure implementation of SuDS in Planning applications in line with SDCC SuDs Guidance. 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; having due regard to sensitive sites such as European sites and biodiversity.
F15	Maintenance of lakes and wetlands to increase storage capacity during severe weather events, where necessary.	Maintenance of lakes and wetlands to increase storage capacity during severe weather events, where necessary, 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.
GOV3	Ensure that all new SDCC Projects are assessed for the feasibility of incorporating climate actions and measures, with a focus on energy, greenhouse gas emissions, nature-based SuDS, enhancing and retaining Green Infrastructure, biodiversity, sustainable transport and modal shift, and EV charging, and environmental protection and co-benefits.	Ensure that all new SDCC Projects are assessed for the feasibility of incorporating climate actions and measures, with a focus on energy, greenhouse gas emissions, nature-based SuDS, enhancing and retaining Green Infrastructure, biodiversity, sustainable transport and modal shift, EV charging and environmental protection and co-benefits.
R3	Identify opportunities to reduce Construction & Demolition (C&D) waste generated by SDCC and liaise with relevant organisations collaboratively.	Identify opportunities to reduce Construction & Demolition (C&D) waste generated by SDCC and liaise with relevant organisations collaboratively. Ensure all reuse of C&D waste/material complies with Waste Management legislation (e.g., Article 27 or 28 requirements) and does not create unintended negative environmental effects.
R11	Identify outdoor locations for recycling bin trial site(s) in South Dublin and deliver a pilot project.	Identify outdoor locations for recycling bin trial site(s) in South Dublin and deliver a pilot project; having due regard to environmental sensitivities such as European sites and biodiversity.
GOV3	Ensure that all new SDCC Projects are assessed for the feasibility of incorporating climate actions and measures, with a focus on energy, greenhouse gas emissions, nature-based SuDS, enhancing and retaining Green Infrastructure, biodiversity, sustainable transport and modal shift, and EV charging, and environmental protection and co-benefits.	Ensure that all new SDCC Projects are assessed for the feasibility of incorporating climate actions and measures, with a focus on energy, greenhouse gas emissions, nature-based SuDS, enhancing and retaining Green Infrastructure, biodiversity, sustainable transport and modal shift, EV charging and environmental protection and co-benefits.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
N3	Increase tree planting across the county. Retain existing trees in South Dublin, as far as possible.	Increase native tree planting across the county. Retain existing native trees in South Dublin, as far as possible, having due regard to environmental sensitivities such as European sites and biodiversity
N7	Implement a programme of enhancement and expansion of ponds and wetland habitats, to expand areas of water storage capacity and increase sequestration.	Implement a programme of enhancement and expansion of ponds and wetland habitats, to expand areas of water storage capacity and increase sequestration, 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.
N8	Continue to implement Dublin Mountains Makeover with Coillte Nature and the Dublin Mountains Partnership exploring opportunities for native tree planting projects to manage surface water run off from mountainous areas to reduce flooding downstream.	Continue to implement Dublin Mountains Makeover with Coillte Nature and the Dublin Mountains Partnership exploring opportunities for native tree planting projects to manage surface water run off from mountainous areas to reduce flooding downstream having due regard to environmental sensitivities such as European sites and biodiversity.
N13	Identify opportunities to remove culverts to restore urban watercourses.	Identify opportunities to remove culverts to restore urban watercourses. Ensure such works are designed and implemented in a manner that does not cause significant negative environmental effects.
GOV3	Ensure that all new SDCC Projects are assessed for the feasibility of incorporating climate actions and measures, with a focus on energy, greenhouse gas emissions, nature-based SuDS, enhancing and retaining Green Infrastructure, biodiversity, sustainable transport and modal shift, and EV charging, and environmental protection and co-benefits.	Ensure that all new SDCC Projects are assessed for the feasibility of incorporating climate actions and measures, with a focus on energy, greenhouse gas emissions, nature-based SuDS, enhancing and retaining Green Infrastructure, biodiversity, sustainable transport and modal shift, EV charging and environmental protection and co-benefits.
CE10	Support the SEAI Sustainable Energy Communities Programme in South Dublin by working with the Local Mentor.	Support the SEAI Sustainable Energy Communities Programme in South Dublin by working with the Local Mentor, where specific supported energy efficiency and renewable energy projects will not lead to unintended negative environmental effects in a local community.
GOV3	Ensure that all new SDCC Projects are assessed for the feasibility of incorporating climate actions and measures, with a focus on energy, greenhouse gas emissions, nature-based SuDS, enhancing and retaining Green Infrastructure, biodiversity, sustainable transport and modal shift, and EV charging, and environmental protection and co-benefits.	Ensure that all new SDCC Projects are assessed for the feasibility of incorporating climate actions and measures, with a focus on energy, greenhouse gas emissions, nature-based SuDS, enhancing and retaining Green Infrastructure, biodiversity, sustainable transport and modal shift, EV charging and environmental protection and co-benefits.
T1	Facilitate, support and guide national agencies in delivering major improvements to the public transport network, in particular Bus Connects, DART+, Luas capacity and new and enhanced rail stations.	Facilitate, support and guide national agencies in delivering major improvements to the public transport network, in particular Bus Connects, DART+, Luas capacity and new and enhanced rail stations, 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:
T3	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.
T4	Deliver a safe active travel network for people of all ages and abilities through the implementation of the Cycle South Dublin programme, including on-road, off road, and greenway routes.	Deliver a safe active travel network for people of all ages and abilities through the implementation of the Cycle South Dublin programme, including on-road, off road, and greenway routes, having due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites, cultural heritage etc.
T6	Maintain a high standard of active travel routes by ensuring regular cleaning and annual maintenance to encourage ongoing use.	Maintain a high standard of active travel routes by ensuring regular cleaning and annual maintenance to encourage ongoing use; having due regard to environmental sensitivities such as European sites and biodiversity.
T9	Continue the development of pedestrian improvements, aligning with any Pedestrian Enhancement Plans developed for the Dublin Metropolitan area.	Continue the development of pedestrian improvements, aligning with any Pedestrian Enhancement Plans developed for the Dublin Metropolitan area, having due regard to environmental sensitivities such as European sites and biodiversity
T11	Identify roads and streets suitable for road space reallocation and progress appropriate schemes.	Identify roads and streets suitable for road space reallocation and progress appropriate schemes, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage etc.
T12	Implement the Safe Routes To School Programme and implement the School Streets Initiative and to ensure that individual communications plans are prepared and executed for each Safe Routes to School project. These plans, in consultation with An Taisce and where appropriate and as needed, could include communications to local residents and to the school community before delivery, during delivery and following completion	Implement the Safe Routes To School Programme and implement the School Streets Initiative, having due regard to environmental sensitivities such as local human receptors, Biodiversity, European sites, water quality and hydrology, and amenity value etc.
T23	Implement the Dublin Local Authority Electric Vehicle Charging Strategy, (aligning with the National EV Charging Infrastructure Strategy 2022-2025)	Implement the Dublin Local Authority Electric Vehicle Charging Strategy, (aligning with the National EV Charging Infrastructure Strategy 2022-2025), having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage etc.
T24	For privately owned EV charge points, create an SDCC Policy & Standards Guidance for the installation of electric vehicle charge points in the public realm.	For privately owned EV charge points, create an SDCC Policy & Standards Guidance for the installation of electric vehicle charge points in the public realm, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage etc.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
T25	In road construction projects, minimise the use of virgin materials and promote the use of reclaimed asphalt pavement (RAP) or low carbon alternatives.	<p>In road construction projects, minimise the use of virgin materials and promote the use of reclaimed asphalt pavement (RAP) or low carbon alternatives.</p> <p>Ensure all reuse of C&D waste/material complies with Waste Management legislation (e.g., Article 27 or 28 requirements) and does not create unintended negative environmental effects.</p>
GOV3	Ensure that all new SDCC Projects are assessed for the feasibility of incorporating climate actions and measures, with a focus on energy, greenhouse gas emissions, nature-based SuDS, enhancing and retaining Green Infrastructure, biodiversity, sustainable transport and modal shift, and EV charging, and environmental protection and co-benefits.	Ensure that all new SDCC Projects are assessed for the feasibility of incorporating climate actions and measures, with a focus on energy, greenhouse gas emissions, nature-based SuDS, enhancing and retaining Green Infrastructure, biodiversity, sustainable transport and modal shift, EV charging and environmental protection and co-benefits.



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

<p>Promote climate action projects that support and maximize 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 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.</p>
<p>Flood defence projects, or related maintenance works, shall be carried out in a manner that promotes climate action-biodiversity related co-benefits, and shall have due regard for the protection and enhancement of rare, protected or important habitats and species.</p>
<p>Ensure climate action related projects are carried out in a manner that promotes climate action-cultural heritage co-benefits, and do not result in unauthorized physical damage to cultural, archaeological or architectural features, or unauthorized or inappropriate alteration of the context of sensitive cultural heritage features.</p>
<p>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.</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.

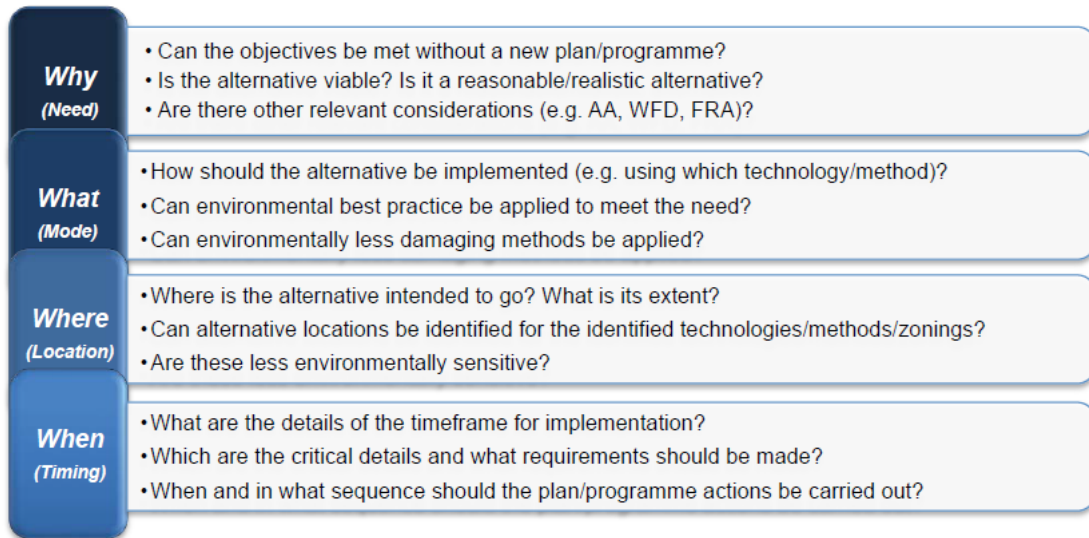


Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3 Developing and Assessing Alternatives in the Strategic Environmental Assessment Process (EPA, 2015).

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
<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 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 South Dublin 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 South Dublin 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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