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LOCAL AUTHORITY CLIMATE ACTION PLAN

Appropriate Assessment Conclusion Statement

Prepared for:
Cork County Council



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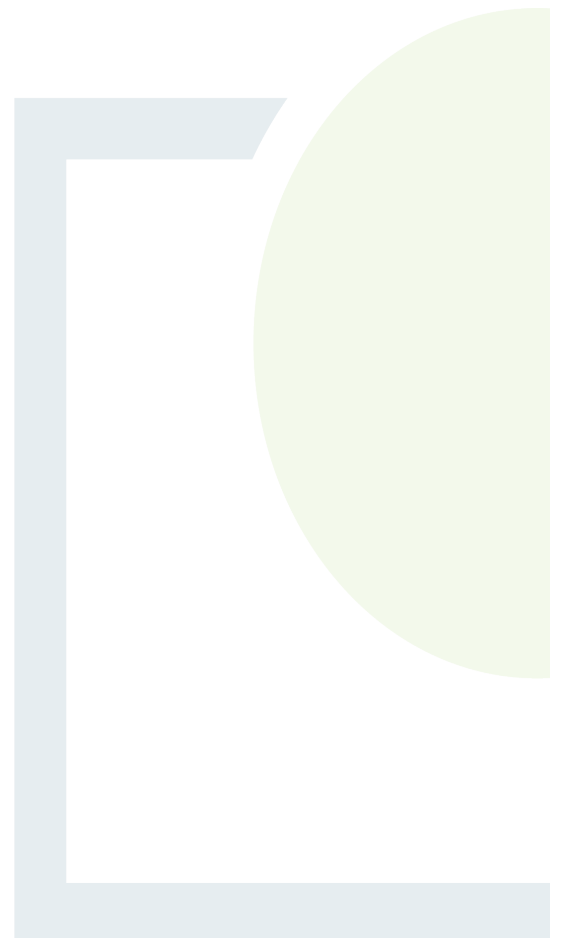
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APPROPRIATE ASSESSMENT CONCLUSION STATEMENT

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

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1. INTRODUCTION

1.1 Background

This is the Appropriate Assessment (AA) Conclusion Statement for the Cork County Council 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.¹ 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 as 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:
4.3.1.1.1	Assess demand sources, e.g buildings, equipment, etc to identify opportunities to eliminate demands	Assess electricity demand sources, e.g buildings, equipment, etc to identify opportunities to eliminate demands
4.3.1.1.2	Upgrade lighting to LED where financially viable	Upgrade lighting to LED where financially viable, while ensuring the lumen levels and spectral range are maintained or reduced/controlled to avoid effects to biodiversity.
4.3.1.1.3	Investigate opportunities for renewable energy sources to identify projects for annual implementation programme	Investigate opportunities for renewable energy sources to identify projects for annual implementation programme, having due regard to planning and environmental protection considerations.
4.3.1.1.4	Replace equipment with more efficient alternatives when available and financially viable	Replace equipment with more efficient alternatives when available and financially viable whilst ensuring WEEE generated as a result of this action is appropriately managed.
4.3.1.2.1	Assess demand sources to identify opportunities to eliminate demands	Assess heating demand sources to identify opportunities to eliminate demands
4.3.1.2.2	Assess opportunities to replace oil/gas burners usage with renewable alternatives to identify projects for annual implementation programme	Assess opportunities to replace oil/gas burners usage with renewable alternatives to identify projects for annual implementation programme; having due regard to planning and environmental protection considerations.
4.3.1.2.3	Assess opportunities to upgrade building insulation to identify projects for annual implementation programme	Assess opportunities to upgrade building insulation to identify projects for annual implementation programme; having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity, and the need to appropriately conserve protected structures.
4.3.1.2.4	Assess opportunities to upgrade building air tightness to identify projects for annual implementation programme	Assess opportunities to upgrade building insulation to identify projects for annual implementation programme; having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity, and the need to appropriately conserve protected structures and features.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
4.3.1.3.1	Assess demand sources to identify opportunities to eliminate demands	Assess transport demand sources to identify opportunities to eliminate demands
4.3.1.3.2	Assess opportunities to replace vehicles with EV where alternatives available and financially viable consumption to identify projects for annual implementation programme	Assess opportunities to replace vehicles with EV where alternatives available and financially viable consumption to identify projects for annual implementation programme, whilst ensuring energy/fuel used to power electric vehicles is sustainably sourced, and appropriate end-of-life management practices are in place for Electric Vehicles.
4.3.1.3.3	Assess opportunities to utilise low emission fuels where available and financially viable to identify opportunities consumption to identify projects for annual implementation programme	Assess opportunities to utilise low emission fuels where available and financially viable to identify opportunities consumption to identify projects for annual implementation programme, whilst ensuring energy/fuel used to power low emission vehicles is sustainably sourced.
4.3.1.4.2	Replace equipment with more efficient when available and financially viable	Replace equipment with more efficient alternatives when available and financially viable whilst ensuring WEEE generated as a result of this action is appropriately managed.
4.2.1.6.2	Any additional or replacement of existing assets needs to take into account the 2030 and 2050 carbon reduction targets.	Any additional or replacement of existing assets needs to take into account the need for sustainability and the 2030 and 2050 greenhouse gas emission reduction targets.
4.4.1.1.2	Trial the EU funded HYBES project 'living lab' in the decarbonisation zone.	Trial the EU funded HYBES project 'living lab' in the decarbonisation zone; having appropriate regard to environmental sensitivities such as sensitive human receptors, European sites and biodiversity, and the need to appropriately conserve protected structures.
4.4.1.8.2	Continue the implementation of 'safe routes to school' and neighbourhood greenways to further enhance localised active-travel infrastructure.	Continue the implementation of 'safe routes to school' and neighbourhood greenways to further enhance localised active-travel infrastructure; having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites and local air quality.
4.4.1.8.3	Continue promotion and support for the Active Travel Green Flags.	Continue promotion and support for the Active Travel Green Flags; having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites and local air quality.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
4.4.1.8.5	Continue to encourage the development of bottom-up sustainable transport initiatives and engage with communities on new initiatives, where appropriate.	Continue to encourage the development of bottom-up sustainable transport initiatives and engage with communities on new initiatives, where appropriate. having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality etc.
4.5.1.2.2	Work with stakeholders to carry out a county wide survey to identify and map wetlands; protect and restore wetlands in Local Authority control; and to support landowners and others to protect and restore wetlands.	Work with stakeholders to carry out a county wide survey to identify and map wetlands; protect and restore wetlands in Local Authority control; and to support landowners and others to protect and restore wetlands in accordance with relevant environmental protection requirements, including water quality, habitat and protected species related requirements.
4.5.1.2.6	Identify opportunities to preserve, enhance and develop ecological connections between areas of high biodiversity value.	Identify opportunities to preserve, enhance and develop ecological connections between areas of high biodiversity value, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites and local air quality.
4.5.1.3.1	Promote biodiversity net gain in all new public and private developments: Require the submission of a green infrastructure statement for all development. Continue to integrate ecological expertise within the development management process including at pre-planning and planning application stages.	Promote biodiversity net gain in all new public and private developments: Require the submission of a green infrastructure statement for all development, ensuring environmental protection requirements are appropriately considered during the planning of green infrastructure. Continue to integrate ecological expertise within the development management process including at pre-planning and planning application stages.
4.5.1.3.2	Continue to integrate ecological expertise and biodiversity protections through placemaking measures in the development and management of public projects including housing, transport infrastructure and public realm projects etc.	Continue to integrate ecological expertise and biodiversity protections through placemaking measures in the development and management of public projects including housing, transport infrastructure and public realm projects etc.; having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, and local air quality.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
4.5.1.4.2	Undertake review of existing council-owned housing estates to supports residents in identifying areas suitable for retrofitting of biodiversity protective measures in accordance with best practice (e.g. tree planting, wildflower meadows, pollinator zones etc.).	Undertake review of existing council-owned housing estates to supports residents in identifying areas suitable for biodiversity protective measures in accordance with best practice (e.g. native tree planting, wildflower meadows, pollinator zones etc.).
4.5.1.4.3	Identify a range of potential pilots to demonstrate sustainable measures including nature-based SuDS; and pilot a biodiversity- and climate-led design for Council-led social housing developments with measures such as green roofs, green walls, wetland & pond SUDS, green carparking, nest boxes in facades, grasslands, and wildlife friendly shrubs and trees in open space.	Identify a range of potential pilots to demonstrate sustainable measures including nature-based SuDS; and pilot a biodiversity- and climate-led design for Council-led social housing developments with measures such as green roofs, green walls, wetland & pond SUDS, green carparking, nest boxes in facades, grasslands, and wildlife friendly native shrubs and trees in open space; having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, and local air quality.
4.5.2.1.3	Work with partners LAWPRO, Uisce Eireann, etc. to identify the impacts of critical and vulnerable receptors in accordance with the River Basin Management Plan and Water Framework Directive and assist in the improvement of river water quality and restoration projects.	Work with partners LAWPRO, Uisce Eireann, etc. to identify the impacts of critical and vulnerable receptors in accordance with the River Basin Management Plan and Water Framework Directive and assist in the improvement of river water quality and restoration projects, whilst promoting the need to consider environmental protection requirements during such projects.
4.5.2.1.4	Utilise natural flood management where feasible and financially viable.	Utilise natural flood management where feasible and financially viable, having due regard to the need to protect environmental sensitivities at these locations, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
4.5.2.3.1	With partners, undertake a Coastal Vulnerability Assessment of the Cork coastline to assess the impact of sea level rise to shoreline change of the Cork Coastline, to inform integrated coastal zone management and identify areas with particular requirements, and to address coastal erosion and implement coastal flooding prioritising ecosystem-based adaptation actions.	With partners, undertake a Coastal Vulnerability Assessment of the Cork coastline to assess the impact of sea level rise to shoreline change of the Cork Coastline, to inform integrated coastal zone management and identify areas with particular requirements, and to address coastal erosion and implement coastal flooding prioritising ecosystem-based adaptation actions; having due regard to environmental sensitivities such as European sites and biodiversity.
4.5.2.3.4	With stakeholders, identify climate adaptation measures for coastal infrastructure & associated defences, and utilize natural coastal management where feasible and financially viable.	With stakeholders, identify climate adaptation measures for coastal infrastructure & associated defences, and utilize natural coastal management where feasible and financially viable; having due regard to environmental sensitivities such as European sites and biodiversity.
4.5.3.1.1	Implement Heritage plan for all aspects of conservation, awareness and recording of all aspects of heritage (built, natural, cultural) ensuring cognisance is taken of climate change.	Implement Heritage plan for all aspects of conservation, awareness and recording of all aspects of heritage (built, natural, cultural) ensuring cognisance is taken of climate change and environmental protection considerations, including heritage conservation requirements.
4.5.3.1.2	Incorporate climate resilience through Built Heritage Investment scheme, Historic Structure Fund and any other relevant funds introduced.	Incorporate climate resilience through Built Heritage Investment scheme, Historic Structure Fund and any other relevant funds introduced, having due regard to environmental protection considerations, including heritage conservation requirements.
4.5.4.1.1	Support sectoral and national afforestation targets in mitigating climate change and the promotion of sustainable forest management initiatives.	Support sectoral and national afforestation targets in mitigating climate change and the promotion of sustainable forest management initiatives; having due regard to environmental sensitivities such as European sites, water quality and biodiversity.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
4.5.4.1.2	Develop a Tree Strategy to provide a framework for the planning, protection, planting and management of trees and woodlands for which Cork County Council has responsibility for.	Develop a Tree Strategy to provide a framework for the planning, protection, planting and management of trees and woodlands for which Cork County Council has responsibility for, ensuring a focus on native trees and having due regard to environmental sensitivities such as European sites and biodiversity.
4.5.4.1.5	Support the implementation of the National Peatlands Strategy.	Support the implementation of the National Peatlands Strategy, whilst promoting the need to consider environmental protection requirements during such projects.
4.5.4.1.6	Implementation of County Development Plan Policy which seeks to achieve a net gain in green infrastructure through the protection and enhancement of existing assets and the provision of new green infrastructure.	Implementation of County Development Plan Policy which seeks to achieve a net gain in green infrastructure through the protection and enhancement of existing assets and the provision of new green infrastructure; having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, and local air quality.
4.5.5.1.1	Encourage the promotion of sustainable land use practices and nature-based solutions to water resource management and flooding which can enhance community resilience by providing natural flood defences, promoting climate adaptation.	Encourage the promotion of sustainable land use practices and nature-based solutions to water resource management and flooding which can enhance community resilience by providing natural flood defences, promoting climate adaptation, having due regard to environmental sensitivities, including Biodiversity, European sites, water quality and sensitive human receptors.
4.5.5.1.2	Promote future proofing in the design and planning of new development to fully consider the potential impacts of climate change and the need for measures to increase the resilience of development to any such impacts.	Promote future proofing in the design and planning of new development to fully consider the potential impacts of climate change and the need for measures to increase the resilience of development to any such impacts; having due regard to environmental sensitivities, including Biodiversity, European sites, water quality and sensitive human receptors.
4.6.1.1.7	Work with other stakeholders to promote and support Cork County as a sustainable tourism destination.	Work with other stakeholders to promote and support Cork County as a sustainable tourism destination; whilst having due regard for sensitivities including biodiversity and European sites.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
4.6.1.3.5	Provide information and raise awareness to Cork County enterprises and business groups to promote supports to undertake retrofits, energy efficiency and renewable energy installation on commercial buildings.	Provide information and raise awareness to Cork County enterprises and business groups to promote supports to undertake retrofits, energy efficiency and renewable energy installation on commercial buildings - whilst promoting the need to consider environmental protection requirements during such energy projects.
4.6.1.5.5	Work in partnership with farmers to improve practices and infrastructure.	Work in partnership with farmers to improve practices and infrastructure, whilst promoting the need for farming enterprises to consider relevant planning and environmental protection requirements.
4.7.1.2.1	Develop Active travel projects throughout the county which can deliver greatest behavioural change.	Develop Active travel projects throughout the county which can deliver greatest behavioural change, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites and local air quality, and opportunities to promote nature based solutions.
4.7.1.2.2	Planned urban development road improvements to incorporate Active travel elements as appropriate	Planned urban development road improvements to incorporate Active travel elements as appropriate, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites and local air quality, and opportunities to promote nature based solutions.
4.7.1.2.3	Continue the ongoing development of Greenways, such as Midleton - Youghal Greenway.	Continue the ongoing development of Greenways, such as Midleton - Youghal Greenway, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites and local air quality, and opportunities to promote nature based solutions.
4.7.1.2.5	Work with relevant authorities in the development of "Safe route to schools".	Work with relevant authorities in the development of "Safe route to schools", having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites and local air quality, and opportunities to promote nature based solutions.
4.7.1.3.2	Align population and employment growth through integration of land use and transport planning.	Align population and employment growth through integration of land use and transport planning, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, and local air quality.
4.7.1.4.1	Work with the relevant stakeholders in the development of the proposed National EV charging network within County Cork.	Work with the relevant stakeholders in the development of the proposed National EV charging network within County Cork, whilst promoting the need to consider environmental protection requirements and disability access during such projects.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
4.7.1.4.2	Engage with ESB to identify areas where the electricity network infrastructure can support EV charging	Engage with ESB to identify areas where the electricity network infrastructure can support EV charging, whilst promoting the need to consider environmental protection requirements during supported infrastructure projects.
4.7.1.4.4	Promote the use of e-vehicles through the provision of e-vehicle charge point requirements in planning applications.	Promote the use of e-vehicles through the provision of e-vehicle charge point requirements in planning applications, whilst promoting the need to consider environmental protection requirements and disability access during such projects.
4.7.1.4.5	Promote the use of low emission fuels.	Promote the use of sustainably sourced low emission fuels.
4.9.1.3.1	Manage Closed landfills to minimise emissions	Manage Closed landfills to minimise emissions, whilst promoting compliance with environmental protection requirements associated with closed landfill sites.
4.9.1.3.2	Work with stakeholders to remediate and manage historic landfills	Work with stakeholders to remediate and manage historic landfills, whilst promoting compliance with environmental protection requirements associated with closed landfill sites.
4.8.1.1.1	Support sustainable offshore wind energy projects at appropriate locations and scales & the development of associated infrastructure at ports to facilitate these developments in accordance with the CDP.	Support sustainable offshore wind energy projects at appropriate locations and scales & the development of associated infrastructure at ports to facilitate these developments in accordance with the CDP - whilst promoting the need to consider environmental protection requirements at the outset of and during such projects.
4.8.1.1.2	Promote renewable energy generation, storage, and distribution infrastructure in accordance with the CDP within the county.	Promote renewable energy generation, storage, and distribution infrastructure in accordance with the CDP within the counties - whilst promoting the need to consider environmental protection requirements at the outset of and during such projects.
4.8.1.2.1	Explore opportunities for establishing district heating to serve council assets including social housing in the county.	Explore opportunities for establishing district heating to serve council assets including social housing in the county, ensuring appropriate regard is had to planning and environmental protection considerations.
4.8.1.2.2	Support stakeholders who wish to develop district heating systems.	Support stakeholders who wish to develop district heating systems, whilst promoting the need to consider environmental protection requirements at the outset of and during such projects.
4.8.1.3.1	Support and implement national policy on EV charging at nondomestic locations.	Support and implement national policy on EV charging at nondomestic locations, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, and local air quality.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
4.8.1.3.2	Engage with ESB to identify locations where electricity network infrastructure can support EV charging facilities.	Engage with ESB to identify locations where electricity network infrastructure can support EV charging facilities, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, and local air quality.
4.8.1.3.3	Develop and implement a policy for EV Charging as part of a wider Taking in Charge policy.	Develop and implement a policy for EV Charging as part of a wider Taking in Charge policy, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, and local air quality.
4.8.3.1.1	Promote the retention and reuse of existing building stock as a first preference.	Promote the retention and reuse of existing building stock as a first preference - having due regard for environmental sensitivities such as local human receptors, European sites and biodiversity; protected species, and the need to appropriately protect and conserve protected structures, during any retrofitting works
4.8.3.1.2	Support provision of information on grant aid for homes and businesses	Support provision of information on grant aid for homes and businesses - whilst promoting the need to consider environmental protection requirements during such projects.
4.8.3.1.3	Encourage energy efficiency improvements for buildings. Advise and educate businesses, residents on energy efficiency	Encourage energy efficiency improvements for buildings. Advise and educate businesses, residents on energy efficiency - whilst promoting the need for projects to conform with relevant planning policy environmental protection criteria.
4.8.3.3.1	Support provision of information on grant aid for onsite renewable generation	Support provision of information on grant aid for onsite renewable generation - whilst promoting the need to consider environmental protection requirements during such projects.
4.8.3.3.2	Encourage onsite renewable generation installation	Encourage onsite renewable generation installation - whilst promoting the need to consider environmental protection requirements during such projects.
4.8.4.1.1	Develop a design ethos that considers climate action in the development of new buildings by Cork County Council or on its behalf. This approach will consider a range of design options including, but not restricted to the use of low carbon materials, building fabric insulation, green roofs, solar photovoltaics, and rainwater harvesting,	Develop a design ethos that considers climate action in the development of new buildings by Cork County Council or on its behalf. This approach will consider a range of design options including, but not restricted to the use of low carbon materials, building fabric insulation, green roofs, solar photovoltaics, and rainwater harvesting, taking account of government policy, design standards and guidelines. Climate action co-benefits and environmental protection requirements shall be appropriately promoted be supported by the design ethos.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	taking account of government policy, design standards and guidelines.	
4.8.4.1.2	Prepare and implement an annual funding program for deep energy retrofitting of existing Council housing stock	Prepare and implement an annual funding program for deep energy retrofitting of existing Council housing stock, having due regard for environmental sensitivities such as local human receptors, European sites and biodiversity; protected species, and the need to appropriately protect and conserve protected structures, during any retrofitting works
4.8.4.1.3	Phase out all fossil fuel-based heating systems by 2030	Phase out all fossil fuel-based heating systems by 2030, having due regard to environmental sensitivities such as local human receptors, protected species associated with such buildings, European sites and biodiversity.
4.8.4.1.4	Refurbish all newly acquired and vacant houses to a minimum B2 energy rating, with all fossil fuel heating sources removed	Refurbish all newly acquired and vacant houses to a minimum B2 energy rating, with all fossil fuel heating sources removed, having due regard to environmental sensitivities such as protected species associated with such buildings, European sites and biodiversity.
4.8.4.1.6	Run a pilot rainwater harvesting retrofit project in an existing Council housing estate in the Decarbonisation Zone.	Run a pilot rainwater harvesting retrofit project in an existing Council housing estate in the Decarbonisation Zone, while ensuring projects have appropriate regard to local environmental sensitivities such as the receiving water environment, biodiversity and European sites.
4.8.4.2.1	Advance installation of underground infrastructure for EV Charging in new social housing estates	Advance installation of underground infrastructure for EV Charging in new social housing estates, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, and local air quality.
4.8.4.2.4	Undertake a review of existing estates to identify potential locations for installation of communal EV charging points and bike parking.	Undertake a review of existing estates to identify potential locations for installation of communal EV charging points and bike parking, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, and local air quality.
4.8.5.1.2	Work with communities to adopt local adaptation measures that reduce local weather impacts considering intensity, duration, and frequency.	Work with communities to adopt local adaptation measures that reduce local weather impacts considering intensity, duration, and frequency, having due regard to the need to promote nature based solutions and Sustainable Drainage Systems, and environmental sensitivities, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
4.8.5.2.1	Develop & implement SUDS & nature-based approaches to manage surface water and protect rivers from pollutants in road water run-off and slow the addition of water volume to mitigate flooding for development projects	Develop & implement SUDS & nature-based approaches to manage surface water and protect rivers from pollutants in road water run-off and slow the addition of water volume to mitigate flooding for development projects. Ensure due regard is given environmental sensitivities, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, during any supported development projects.
4.8.5.2.2	Undertake rainwater management planning for all main towns. Assist Planning Policy Unit to develop a rainwater management plan for Urban settlements	Undertake rainwater management planning for all main towns. Assist Planning Policy Unit to develop a rainwater management plan for Urban settlements, having due regard to the need to promote nature based solutions and Sustainable Drainage Systems, and environmental sensitivities, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology.
4.8.5.2.3	Support the roll out of Flood Relief Schemes in the County, including those in partnership with the OPW, as identified through the Catchment Flood Risk Assessment and Management (CFRAMS) Programme and in the County Strategic Flood Risk Assessment.	Support the roll out of Flood Relief Schemes in the County, including those in partnership with the OPW, as identified through the Catchment Flood Risk Assessment and Management (CFRAMS) Programme and in the County Strategic Flood Risk Assessment - 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.
4.8.5.3.1	Assess bridge infrastructure in line with predicted climate impacts.	Assess bridge infrastructure in line with predicted climate impacts, having due regard to the need to appropriately protect, conserve and enhance important habitats and species and European sites, and the conservation status of protected bridges.
4.8.5.3.2	Carry out road maintenance and rehabilitation of regional and local roads in accordance with the guidance document on the climate adaptation of regional and local roads	Carry out road maintenance and rehabilitation of regional and local roads in accordance with the guidance document on the climate adaptation of regional and local roads, having due regard to environmental sensitivities, including water quality, biodiversity, riparian corridors and air quality.



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 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.</p>
<p>Flood defence projects or related maintenance works supported by plan actions 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 unauthorised physical damage to cultural, archaeological or architectural features, or unauthorised 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>
<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 all projects supported by the council have taken the necessary precautions to identify and manage invasives species, particularly with regard to Schedule III species. No 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 support 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.

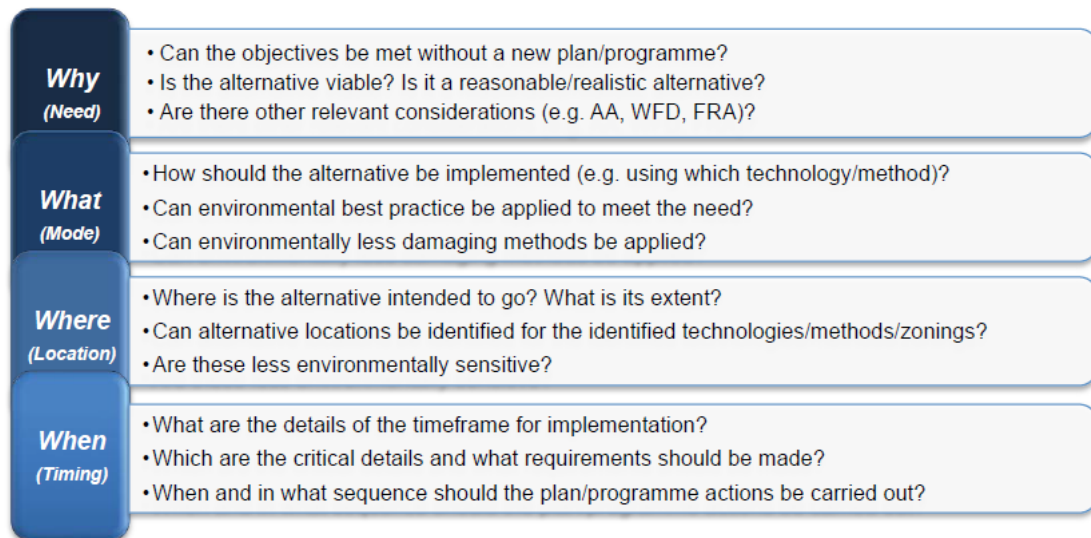


Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3 Developing and Assessing Alternatives in the Strategic Environmental Assessment Process (EPA, 2015).

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 have led 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 realise 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 realise 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 finalised 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 Cork County Council 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 Cork County Council 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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