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LOCAL AUTHORITY CLIMATE ACTION PLAN

Appropriate Assessment Conclusion Statement

Prepared for:
Tipperary County Council



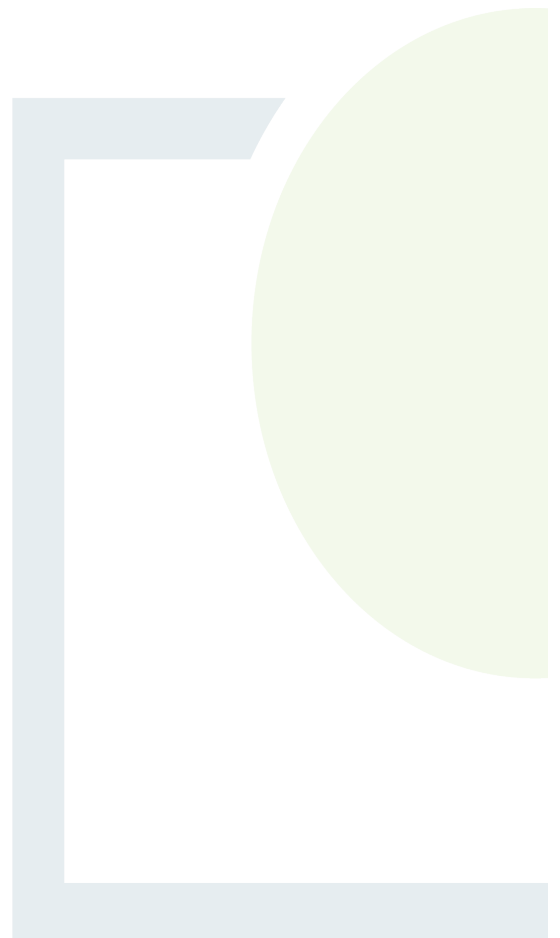
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APPROPRIATE ASSESSMENT CONCLUSION STATEMENT

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

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1. INTRODUCTION

1.1 Background

This is the Appropriate Assessment (AA) Conclusion Statement for the Tipperary 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 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:
2.3	Carry out an Ecological/Habitat audit of local authority owned land, in accordance with an agreed methodology, to identify areas suitable for restoration and enhanced carbon storage through tree-planting and biodiversity measures.	Carry out an Ecological/Habitat audit of local authority owned land, in accordance with an agreed methodology, to identify areas suitable for restoration and enhanced carbon storage through tree-planting and biodiversity measures, having due regard to the need to conserve and enhance protected species, biodiversity and European sites on or connected to local authority lands.
3.1	<p>Prepare and implement a pipeline of projects and initiatives for Local Authority Buildings/Facilities to assist in achieving a 51% reduction in non-electrical building emissions (thermal) by 2030. Programme to include (at the minimum) for the following:</p> <p>Building Stock Plans</p> <p>Prepare Buildings for 2050 in so far as practical (Net Zero Emissions)</p> <p>Energy Efficiency Projects</p> <p>'Reduce Your Use' initiatives (see Action 1.15)</p> <p>Renewable Energy Technologies</p> <p>Lifecycle analysis/Green Public Procurement</p> <p>Consideration of specialist building requirements i.e. HVAC in Museum, fire training services etc.</p> <p>Consider use of emerging technologies and materials</p> <p>Note: See related Action 5.3 Nature-based solutions and integrated rainwater management protocol</p>	<p>Prepare and implement a pipeline of projects and initiatives for Local Authority Buildings/Facilities to assist in achieving a 51% reduction in non-electrical building emissions (thermal) by 2030 and to improve adaptation to climate change. Programme to include (at the minimum) for the following:</p> <p>Agreed schedule of buildings to be upgraded with phasing and costing.</p> <p>Renewable Energy technologies</p> <p>Lifecycle analysis/Green Public procurement</p> <p>Consideration of specialist building requirements i.e. HVAC in Museum, fire training services etc.</p> <p>Consider use of emerging technologies and materials</p> <p>Due regard shall be had to relevant planning and environmental protection criteria, including the need to protect European sites, when implementing this action.</p>
3.2	Prepare and implement a pipeline of projects and initiatives for Council Fleet and Transport Management operations to assist in achieving a 51% reduction in non-electrical transport greenhouse gas emissions by 2030.	<p>Prepare and implement a pipeline of projects and initiatives for Council Fleet and Transport Management operations to assist in achieving a 51% reduction in non-electrical transport greenhouse gas emissions by 2030 and to adapt to climate change. Programme of measures to include (at the minimum) for the following:</p> <ul style="list-style-type: none"> • Review of driver behaviour • Education and training programme for Fleet Vehicle Drivers • Review of fuel procurement procedures



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	<p>Programme of measures to include (at the minimum) for the following:</p> <ul style="list-style-type: none"> • Prepare a 'Fleet Decarbonisation Roadmap' • Review of driver behaviour • Education and training programme for Fleet Vehicle Drivers • Review of fuel procurement procedures • Move to alternative vehicles, including EV, and alternative fuel types including HVO. • Optimisation of road works programme • Continue the exploration of acquiring more carbon efficient large vehicles • Consider use of emerging technologies and materials • Ensure that alternative fuel sources are sustainably sourced and appropriate end-of-life management practices are in place for Electric Vehicles. 	<ul style="list-style-type: none"> • Move to alternative vehicles, including EV, and alternative fuel types including HVO. • Optimisation of road works programme • Continue the exploration of acquiring more carbon efficient large vehicles • Consider use of emerging technologies and materials <p>Whilst ensuring energy/fuel used to power local authority alternative vehicles is sustainably sourced, and appropriate end-of-life management practices are in place for Electric Vehicles.</p>
3.3	<p>Prepare and implement a range of measures to achieve Overall Emissions Reductions of 51% by 2030 (2016-2018 baseline) and achieve 50% energy efficiency metric (2006-2008 baseline).</p> <p>This will require implementation of the actions outlined in items 3.1 and 3.2, and also a focus on other emissions reductions and adaptation measures, mainly electrical and such as:</p> <ul style="list-style-type: none"> • Energy Efficient Public Lighting • Energy Efficient Building Lighting <p>Note: Ensure that potential actions maintain/control or reduce existing lumen levels and spectral range to avoid effects on biodiversity.</p>	<p>Deliver the Tipperary Public Lighting Energy Efficiency Project while ensuring potential actions maintain/control or reduce existing lumen levels and spectral range to avoid effects on biodiversity.</p>



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
3.4	Participate/lead in national/regional funding programmes for local authorities, for example, the SEAI Energy Retrofit 'Pathfinder' funding programme etc, to support funding for emissions reductions measures.	Participate/lead in national/regional funding programmes for local authorities, for example, the SEAI Energy Retrofit 'Pathfinder' funding programme etc, to support funding for emissions reductions measures; All retrofitting and maintenance works will prioritise energy efficiencies, segregated waste facilities, renewable energy generation (solar PV, geothermal and micro wind generation where feasible), and mobility options (shared bikes, micro mobility and EV charging); having due regard to environmental sensitivities such as European sites and biodiversity etc.
3.5	Develop a 'Strategy for Zero Emissions Vehicles' for Tipperary and commence implementation of the actions/recommendations/targets as identified having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.	Develop an Electric Vehicle Strategy for Tipperary and commence implementation of the actions/recommendations/targets as identified; having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality etc.
3.6	Roll-out public Electric Vehicle charge points in line with targets set out in Electric Vehicle Strategy (Action 3.5)	Roll-out public Electric Vehicle charge points in line with targets set out in Electric Vehicle Strategy (Action 3.5), having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage etc.
3.7	Continue to roll-out the Council's Active Travel Programme maximising available funding from the NTA	Continue to roll-out the Council's Active Travel Programme maximising available funding from the NTA, having appropriate regard to environmental sensitivities such as traffic and transport constraints and aspects, European sites and biodiversity.
3.8	Carry out an assessment for the delivery of 'car-restricted zones' with reallocation of space, in certain suitable areas i.e. town centres, schools etc where the focus should be on active travel, business and amenity, as appropriate.	Carry out an assessment for the delivery of 'car-restricted zones' with reallocation of space, in certain suitable areas i.e. town centres, schools etc where the focus should be on active travel, business and amenity, as appropriate, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage etc.
3.9	Deliver new Greenway Infrastructure in line with the provisions of the National Cycle Network.	Deliver new Greenway Infrastructure in line with the provisions of the National Cycle Network, having due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites, cultural heritage etc.
3.11	Deliver the Clonmel Pathfinder Programme (1 of 35 exemplar transport projects) by 2025, subject to funding.	Deliver the Clonmel Pathfinder Programme (1 of 35 exemplar transport projects) by 2025, subject to funding; All retrofitting and maintenance works will prioritise energy efficiencies, segregated waste facilities, renewable energy generation (solar PV, geothermal and micro wind generation where feasible), and mobility options (shared bikes, micro mobility and EV charging); having due regard to environmental sensitivities such as European sites and biodiversity etc.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
3.13	Implement an annual housing retrofit programme for local authority housing stock in accordance with funding programmes such as the National Retrofit Plan (DECC) and other relevant programmes.	Implement an annual housing retrofit programme for local authority housing stock in accordance with funding programmes such as the National Retrofit Plan (DECC) and other relevant programmes, having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity, and the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations.
3.16	The Council will seek to show leadership by the design and construction of Net-Zero Homes as part of their building programmes.	The Council will seek to show leadership by the design and construction of Net-Zero Homes as part of their building programmes, having due regard to environmental sensitivities such as local human receptors, Biodiversity, European sites, water quality and hydrology, and amenity value etc.
3.17	Implement and promote across Council networks, national building refurbishment and vacancy programmes for private sector housing, for example Croí Cónaithe scheme.	Implement and promote across Council networks, national building refurbishment and vacancy programmes for private sector housing, for example Croí Cónaithe scheme; having due regard to environmental sensitivities such as European sites and biodiversity.
3.18	Carry out a feasibility study to identify a suitable Local Authority-Led District Heating programme. If feasible, develop a local authority-led District Heating project in a Key Town (Clonmel, Nenagh or Thurles).	Carry out a feasibility study to identify a suitable Local Authority-Led District Heating programme. If feasible, develop a local authority-led District Heating project in a Key Town (Clonmel, Nenagh or Thurles), 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.
4.2	In line with the Town-Centre First programme, reduce vacancy and dereliction in Key Towns, District Towns and Service Centres by collaborating with owners in finding ways that these structures can be brought back to use.	In line with the Town-Centre First programme, reduce vacancy and dereliction in Key Towns, District Towns and Service Centres by collaborating with owners in finding ways that these structures can be brought back to use - 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.
4.3	In order to underpin the delivery of an active travel programme, support preparation of 'Local Transport Plans' for Key Towns and Sustainable Travel Plans' for 'District Towns'.	In order to underpin the delivery of an active travel programme, support preparation of 'Local Transport Plans' for Key Towns and Sustainable Travel Plans' for 'District Towns,' whilst ensuring these plans are: - Designed to mitigate potential environmental impacts associated with supported active travel infrastructure. - Support the carrying out of environmental/biodiversity enhancement during the active travel development process.
4.4	Support the delivery of an 'Integrated Transport Hub' in the Key Towns of Clonmel, Nenagh and Thurles to incorporate and support multi-modal services and active travel linkages with town centre areas/regional services.	Support the delivery of an 'Integrated Transport Hub' in the Key Towns of Clonmel, Nenagh and Thurles to incorporate and support multi-modal services and active travel linkages with town centre areas/regional services, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, and cultural heritage.
4.12	Seek to actively support the development of the bioeconomy in Tipperary, including new and emerging technologies, both	Seek to actively support the development of the bio-economy in Tipperary, including new and emerging technologies, both in the Decarbonising Zone (National Bio-Economy Campus) and elsewhere in the county



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	in the Decarbonising Zone (National Bioeconomy Campus) and elsewhere in the county in line with the National Bioeconomy Action Plan 2023 – 2025, whilst advocating and exerting influence to ensure bioeconomy related development and activities promote climate action co-benefits, and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.	in line with the National Bio-Economy Action Plan 2023 – 2025, whilst advocating and exerting influence to ensure Bio-economy related development and activities promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.
5.1	The Council will seek to prioritise the delivery of Catchment Flood Risk Assessment and Management (CFRAM) Programme identified flood schemes in Tipperary.	The Council will seek to prioritise the delivery of Catchment Flood Risk Assessment and Management (CFRAM) Programme identified flood schemes in Tipperary, 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.
5.5	Introduce and implement a policy in relation to how Council owned spaces are managed to improve biodiversity levels in keeping with the 'All Ireland Pollinator Plan', and as part of this to develop and implement a pesticide reduction policy for lands and areas managed by the Council.	Introduce and implement a policy in relation to how Council owned spaces are managed to improve biodiversity levels in keeping with the 'All Ireland Pollinator Plan', and as part of this to develop and implement a pesticide reduction policy for lands and areas managed by the Council - ensuring these substances are only used to a degree that does not cause significant effects on the receiving environment, such as the receiving water environment, biodiversity or European sites.
5.8	Building on work carried out for the 'Tipperary County Wetland Survey', develop a 'Wetland Restoration Plan', this shall identify priority areas for habitat restoration, carbon capture and biodiversity benefits, along with phasing for restoration and 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.	Building on the 'Tipperary County Wetland Survey', develop a Wetland Restoration Plan, this shall identify priority areas for habitat restoration, carbon capture and biodiversity benefits, along with phasing for restoration, 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.
6.11	Support and inform a climate proofing programme for natural water resources, and to better manage flooding at the catchment level, the Council will identify a sub-catchment where water quality objectives are not being met, and where there is an established flood risk. A study will be commissioned for this sub-catchment to:	Support and inform a climate proofing programme for natural water resources, and to better manage flooding at the catchment level, the Council will identify a sub-catchment where water quality objectives are not being met, and where there is an established flood risk. A study will be commissioned for this sub-catchment to: <ul style="list-style-type: none"> • Identify the reasons why Water Framework Directive water quality objectives are not being met, • Set out baseline water quality standards to enable monitoring,



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	<p>i. Identify the reasons why Water Framework Directive water quality objectives are not being met,</p> <p>ii. Set out baseline water quality standards to enable monitoring,</p> <p>iii. Identify solutions (incl. nature based) to reducing flood risk at the catchment level, and</p> <p>iv. Set out viable, positive and collaborative mechanisms at the community level for how they can be delivered.</p>	<ul style="list-style-type: none"> Identify solutions (incl nature based) to reducing flood risk at the catchment level, and, Set out viable, positive and collaborative mechanisms at the community level for how they can be delivered. <p>The programme shall have due regard to the protection of biodiversity and European sites and avoidance of habitat fragmentation.</p>
6.16	Continue to organise training/seminars to promote adaptive reuse of historic and protected structures.	Continue to organise training/seminars to promote adaptive reuse of historic and protected structures; having due regard to environmental sensitivities such as European sites and biodiversity.
6.18	Carry out a feasibility assessment of Council owned land assets to determine if it would be possible to identify a site(s) for a 100% owned community-led Renewable Energy development. If considered feasible, progress the project to delivery.	Carry out a feasibility assessment of Council owned land assets to determine if it would be possible to identify a site(s) for a 100% owned community-led Renewable Energy development, ensuring the study has appropriate regard to planning and environmental protected considerations. If considered feasible, progress the project to delivery, having appropriate regard to relevant planning and environmental protection criteria.
8.6	Participate/lead in strategic projects and collaborations, for example, The Atlantic Green Digital Basin Shannon etc., in order to enhance opportunities for Green/Renewable Energy in Tipperary	Participate/lead in strategic projects and collaborations, for example, The Atlantic Green Digital Basin Shannon etc., in order to enhance opportunities for Green/Renewable Energy in Tipperary, 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.
9.1	Work with and support the National Transport Authority and Tipperary Transport Co-ordination Unit in the delivery and expansion of public transport initiatives in the county.	Work with and support the National Transport Authority and Tipperary Transport Co-ordination Unit in the delivery and expansion of public transport initiatives in the county, 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.
9.2	Resolve local flooding issues utilising OPW and Department of Transport funding (Drainage programme, Climate Adaptation and Resilience Works, OPW Minor Works Scheme and Nature Based Solutions.	Resolve local flooding issues utilising OPW and Department of Transport funding (Drainage programme, Climate Adaptation and Resilience Works, OPW Minor Works Scheme and Nature Based Solutions, having due regard to the protection of biodiversity and European sites and avoidance of habitat fragmentation.
9.3	Commence a 'Bridge Structures Inspection Programme' to determine and respond to the effects of climate change and the increased risk of bridge structures being compromised (increased flows, more debris in flood waters, increased flood levels etc.).	Commence a 'Bridge Structures Inspection Programme' to determine and respond to the effects of climate change and the increased risk of bridge structures being compromised (increased flows, more debris in flood waters, increased flood levels etc.), having due regard to the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations, and the need to not negatively impinge on any protected species or European sites.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
9.6	Advocate for improved rail transport services on interregional routes, key improvements to include: <ul style="list-style-type: none"> • The reopening of the rail route between Rosslare harbour and Waterford Town. • Improved rail services/facilities on existing rail routes (Limerick to Waterford and Limerick, Ballybrophy/Dublin lines) that service Tipperary's Towns • The development of a rail freight hub at Limerick Junction. 	Advocate for improved rail transport services on interregional routes, key improvements to include: <ul style="list-style-type: none"> • The reopening of the rail route between Rosslare harbour and Waterford Town. • Improved rail services/facilities on existing rail routes (Limerick to Waterford and Limerick, Ballybrophy/Dublin lines) that service Tipperary's Towns • The development of a rail freight hub at Limerick Junction. Advocate and exert influence to ensure such improvements promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.
9.7	Advocate for improved bus transport in Tipperary and in the region, key improvements to include: <ul style="list-style-type: none"> • New routes • Integrated ticketing • Increased services 	Advocate for improved bus transport in Tipperary and in the region, key improvements to include: <ul style="list-style-type: none"> • New routes; • Integrated ticketing; • Increased services. Advocate and exert influence to ensure such improvements promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.



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. 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 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.

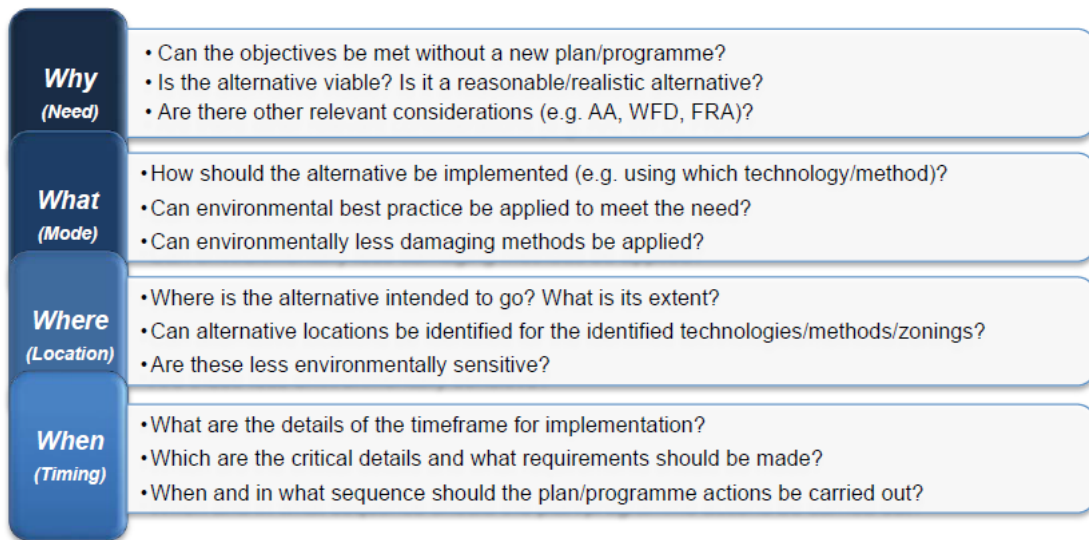


Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3 Developing and Assessing Alternatives in the Strategic Environmental Assessment Process (EPA, 2015).

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 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 Tipperary 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 Tipperary 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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