FEHILY TIMONEY

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LOCAL AUTHORITY CLIMATE ACTION PLAN

Appropriate Assessment Conclusion Statement

Prepared for:

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

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1. INTRODUCTION

1.1 Background

This is the Appropriate Assessment (AA) Conclusion Statement for the Clare Local Authority Climate Action Plan (LACAP) 2024 - 2029. The obligation to undertake AA derives from Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC as transposed into Irish legislation by the European Communities (Birds and Natural Habitats) Regulations 2011 and the Planning and Development Act 2000, as amended.

AA is a focused and detailed impact assessment of the implications of a strategic action (such as a plan or programme) or project, alone and in combination with other strategic actions and projects, on the integrity of any European Site in view of its conservation objectives.

AA was undertaken for the LACAP. This AA Conclusion Statement documents the AA process applied during the preparation of the LACAP and should be read in conjunction with the LACAP and associated documents including the Natura Impact Report (NIR) for the Plan.

1.2 Requirements in relation to AA Conclusion Statements

Guidelines entitled 'Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities' (2009) published by the then named Department of Environment, Heritage and Local Government recommend that plan-making competent authorities ;include a clear and discrete AA Conclusion Statement as a distinct section in the written statement of the plan separate to the SEA statement.' These guidelines recommend that the following information is included in an AA Conclusion Statement:

- Summary of how the findings of the AA were factored into the plan (provided in Section 2 of this document);
- Reasons for choosing the plan as adopted, in the light of other reasonable alternatives considered as part of the AA process (provided in Section 3 of this document); and,
- A declaration that the plan as adopted will not have an adverse effect on the integrity of a Natura 2000 site or sites (provided in Section 4 of this document.
- Copy of NIR (the NIR was published alongside the AA Conclusion Statement and is available for review).[1]

[1] This NIR provides the following information:

- Sufficient detail of the LACAP to make clear its size, scale and objectives.
- A description of baseline conditions, conservation objectives, and relevant ecological and environmental issues in relation to relevant European sites that be affected by plan implementation (in the absence of mitigation).
- Potential adverse impacts of the Plam 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:
G1.6	Develop strategy/resources to ensure all council-owned buildings are included under a broadened Facilities Management System	The implementation of this action will have no real environmental effect when considered in isolation. The action has the potential to promote organisational climate action and facilitate the upgrading of Council-owned buildings.
BE1.1	Conduct Energy Audits across Clare County Council's Significant Energy Users (SEUs) to inform creation of Gap to Target analysis.	This action promotes energy saving and energy efficiency within the local authority organisation. This action is not likely to have any environmental or climate effects when considered in isolation but the creation of targets may facilitate the Council in realising their energy goals.
BE1.4	Completion of Public Lighting Energy Efficiency Project.	This action will support the local authority in reducing its organizational GHG emissions in line with climate policy and legislation and emission reduction targets. The action is likely to have a slight positive environmental effect in terms of GHG emissions however, the spectrum of light from LED sources has the potential to impact nocturnal species. Therefore there is also scope for there to be slight negative effects if unmitigated.
BE1.5	Undertake deep retrofitting of Clare County Council facilities through the Pathfinder Programme.	This action will support the implementation of active travel projects defined in the Department of Transport Pathfinder programme for the local authority functional area. In the absence of any mitigation, works involved in the retrofitting have the potential to generate a range of slight to significant environmental effects, including noise impacts, local air quality impacts (through the generation of construction dust), impacts on water quality (through the run-off of silt and cement based products during construction) and biodiversity impacts.
BE1.6	Develop and Implement energy efficiency projects in Clare County Council owned and operated buildings/assets that deliver on 50% energy efficiency and 51% emissions targets.	This action will support the local authority in reducing its organizational GHG emissions in line with climate policy and legislation and emission reduction targets. The action is likely to have a slight positive environmental effect - having regard to the share of GHG emission reductions that can be supported via this action relative to national GHG emission reduction targets and requirements. Upgrade or retrofitting works associated with this action may result in the generation of localized environmental effects, including dust and noise impacts.
BE1.7	Social Housing Stock - Advance retrofitting programme subject to Dept funding.	This action will support retrofitting aimed at regenerative action with energy efficiency at the core. The adoption of this action can potentially result in reduced energy consumption and prevent GHG emissions. The action is likely to have a slight positive effect on climate - having regard to the share of GHG emission reductions that can be supported via this action relative to national GHG emission reduction targets and requirements. Given the urban nature of the works, there are no significant impacts identified to be likely. However, due regard should be given to Annex IV species which may be roosting in any structures which are to be developed.

Action Reference	Original Action	Recommendations integrated into the Plan, included in:
BE1.8	Implement renewable energy projects in Clare County Council buildings/locations that deliver on energy efficiency and emissions targets.	This action will support the local authority reducing its organisational GHG emissions in line with climate policy and legislation and emission reduction targets. The action is likely to have a slight positive environmental effect - having regard to the share of GHG emission reductions that can be supported via this action relative to national GHG emission reduction targets and requirements. This action may support the development of on-site renewable energy infrastructure at local authority sites. The development of PV panels on Council buildings has the potential to result in negative glint and glare impacts on sensitive environmental receptors.
BE2.1	Support the development of renewable energy infrastructure and ancillary facilities in order to meet national, regional and county renewable energy targets through planning policy and land use objectives.	This is an action that serves to promote the development of renewable energy infrastructure and associated ancillary infrastructure, including linear development. This action can potentially lead to positive climate effects. The supporting of such developments could however result in a variety of slight to very significant negative environmental effects, including impacts on important habitats and species (due to collision risk and vibration effects), including European sites - thus further consideration and mitigation measures are required.
BE2.2	Support new developments and major renovations to integrate climate into design through the development management process.	This action will support the development of new buildings and public realm space that place sustainability and energy efficiency to the forefront. The adoption of this action can potentially result in reduced energy consumption in new development and prevent GHG emissions. The action is likely to have a slight and maybe moderate positive effect on climate - having regard to the share of GHG emission reductions that can be supported via this action relative to national GHG emission reduction targets and requirements. Integrating climate considerations into the development planning and design processes has the potential to result in the creation of unintended negative environmental, if climate considerations are prioritized over environmental protection related consideration, including a wide range of potential impacts across multiple environmental components.
BE2.3	Ensure Ennis Local Area Plan and Shannon Local Area Plan integrate and advance climate action.	This action has the potential to contribute to the creation of slight positive environmental effects on climate, biodiversity, water quality and hydrology, and local air quality. Development supported by this action, such as renewable energy, active travel or drainage related development could potentially have negative environmental effects.
BE2.4	Support the implementation of the Shannon Estuary Taskforce Report (including development of Maritime Training Centre of Excellence in Kilrush).	This is an action that serves to support the carrying out of development, including offshore renewable energy projects development. This action can potentially indirectly lead to positive climate effects. The supporting of such developments could however result in a variety of slight to very significant negative environmental effects, including impacts on important habitats and species (due to collision risk and vibration effects), including European sites - thus further consideration and mitigation measures are required.

Action Reference	Original Action	Recommendations integrated into the Plan, included in:
BE2.5	Support upgrade of existing residential and commercial properties to promote sustainable compact growth and regeneration.	This action will support regenerative action in the community, with some focus on energy efficiency. The adoption of this action can potentially result in reduced energy consumption and prevent GHG emissions in the County. The action is likely to have a slight positive effect on climate - having regard to the share of GHG emission reductions that can be supported via this action relative to national GHG emission reduction targets and requirements. Given the largely urban nature of some of the works (such as Towns Centre First), there are no significant impacts identified to be likely. However, due regard should be given to Annex IV species which may be roosting in any structures which are to be developed.
BE2.6	Develop feasibility reports into District Heating for Ennis & Shannon.	This action is likely to have no environmental effect in and of itself but will provide essential information underpinning the potential development of district heating for Ennis which may result in lowering GHG emissions in the town.
BE3.3	Undertake bridge repair programme to safeguard against climate impacts.	This activity has the potential to adversely affect Annex II and IV species such as Daubenton's Bat through disturbance and habitat loss or impact protected structures if incorrectly implemented.
BE3.4	Carry out condition survey of Clarecastle Flood Barrage to inform short, medium, and long-term decision making on future flood strategy.	This is a survey based action and will not have any real environmental effect in and off itself. The completion of such assessments however will underpin and support flood defense strategy going forward however. The study has the potential to lead to further action that could have very significant environmental effects, including effects water quality and hydrology, biodiversity, European site or sensitive human receptors.
BE3.5	Implement the recommendations of the Catchment Flood Risk Assessment and Management Study (CFRAMS) programme as it relates to County Clare and to ensure that flood risk management policies and infrastructure are progressively implemented (CDP).	The progression of this flood resilience related action has the potential to lead to significant development taking place. In the absence of any mitigation, such development could potentially have a variety of significant, negative environmental effects, including effects on: water quality, biodiversity, including flora and fauna reliant on aquatic eco-systems; the receiving air environment (due to the generation of construction dust), the receiving noise environment (due to the generation of construction phase noise), and the receiving human environment. Flood resilience action has the potential to have positive environmental effects. The possible development of nature based solutions and SuDS as part of a flood risk management policy has the potential to have slight to significant, positive effects on biodiversity and water quality. The delivery of flood resilience action has the potential to reduce flood risk and prevent future flood events. Reducing flood risk can generate significant, positive effects for a variety of environmental receptors that could be negatively impacted by flood events; including ecological receptors. The implementation of a flood management policy is likely to have slight to significant positive effects on the receiving soils environment - through the prevention of erosion. This may have also a beneficial impact on inter-related environmental components that could potentially be impacted by fluvial erosion.

Action Reference	Original Action	Recommendations integrated into the Plan, included in:
T1.1	Deliver active travel projects in towns and villages across the county.	This action supports the development of additional active travel infrastructure. In the absence of any mitigation, works involved in the construction of additional active travel infrastructure have the potential to generate a range of slight to significant environmental effects, including noise impacts, local air quality impacts (through the generation of construction dust), impacts on water quality (through the run-off of silt and cement based products during construction) and biodiversity impacts. The delivery of an expanded safe active travel network has the potential to promote the use of sustainable and active travel modes in the community, encourage modal shift and support the reduction of vehicle related emissions. This is likely to have a slight to moderate positive environmental effect - having regard to the share of GHG emission reductions that can be supported via this action relative to national GHG emission reduction targets and requirements.
T1.2	Advance the delivery of the West Clare Railway Greenway, having due regard to climate resiliency, opportunities to enhance tourism, recreation and cultural heritage value associated with the route, and environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites, and cultural heritage related sensitivities.	This action supports the development of additional green infrastructure. In the absence of any mitigation, works involved in the construction of such infrastructures have the potential to generate a range of slight to significant environmental effects, including noise impacts, local air quality impacts (through the generation of construction dust), impacts on water quality (through the run-off of silt and cement based products during construction) and biodiversity impacts. The delivery of an expanded, safe active travel network has the potential to promote the use of sustainable and active travel modes in the community, encourage modal shift and support the reduction of vehicle related emissions. This is likely to have a slight to moderate positive environmental effect - having regard to the share of GHG emission reductions that can be supported via this action relative to national GHG emission reduction targets and requirements.
T1.3	Complete development of Ennis/Tulla Road, St Flannan's and Lahinch Road active travel projects.	This action supports the development of additional active travel infrastructure. In the absence of any mitigation, works involved in the construction of additional active travel infrastructure have the potential to generate a range of slight to significant environmental effects, including noise impacts, local air quality impacts (through the generation of construction dust), impacts on water quality (through the run-off of silt and cement based products during construction) and biodiversity impacts. The delivery of an expanded safe active travel network has the potential to promote the use of sustainable and active travel modes in the community, encourage modal shift and support the reduction of vehicle related emissions. This is likely to have a slight to moderate positive environmental effect - having regard to the share of GHG emission reductions that can be supported via this action relative to national GHG emission reduction targets and requirements.

Action Reference	Original Action	Recommendations integrated into the Plan, included in:
T1.4	Develop and adopt an Electric Vehicle Strategy for County Clare.	The development of this strategy has the potential to lead to the development of multiple charging points and ancillary electrical infrastructure including grid connection routes across the extent of the local authority's functional area. In the absence of any mitigation, works involved in the construction of additional charging point infrastructure have the potential to generate a range of slight to significant environmental effects, including noise impacts, local air quality impacts (through the generation of construction dust), impacts on water quality (through the run-off of silt and cement based products during construction), and biodiversity impacts. The delivery of good network of charging infrastructure has the potential to promote the use of sustainable travel modes in the community, encourage modal shift and support the reduction of vehicle related emissions. This is likely to have a slight to moderate positive environmental effect - having regard to the share of GHG emission reductions that can be supported via this action relative to national GHG emission reduction targets and requirements.
T1.5	Support implementation of Electric Vehicle Strategy to increase electric vehicle charging infrastructure.	The expansion of the EV charging network will lead to the development of multiple charging points and ancillary electrical infrastructure including grid connection routes across the extent of the local authority's functional area. In the absence of any mitigation, works involved in the construction of additional charging point infrastructure have the potential to generate a range of slight to significant environmental effects, including noise impacts, local air quality impacts (through the generation of construction dust), impacts on water quality (through the run-off of silt and cement based products during construction), and biodiversity impacts. The delivery of good network of charging infrastructure has the potential to promote the use of sustainable travel modes in the community, encourage modal shift and support the reduction of vehicle related emissions. This is likely to have a slight to moderate positive environmental effect - having regard to the share of GHG emission reductions that can be supported via this action relative to national GHG emission reduction targets and requirements.
T1.8	Support the delivery of an efficient and reliable public bus system for Ennis.	The delivery of an expanded, safe public transport network has the potential to promote the use of sustainable modes in the community, encourage modal shift and support the reduction of vehicle related emissions. This is likely to have a slight to moderate positive environmental effect - having regard to the share of GHG emission reductions that can be supported via this action relative to national GHG emission reduction targets and requirements. In the absence of any mitigation, works involved in the construction of public transport infrastructure have the potential to generate a range of slight to profound significant environmental effects (depending the scale, extent and character of the development), including noise impacts, local air quality impacts (through the generation of construction dust), impacts on water quality (through the run-off of silt and cement based products during construction), and biodiversity impacts.

Action Reference	Original Action	Recommendations integrated into the Plan, included in:
T1.9	Advance the installation of bus shelters at bus stops throughout the county.	This action supports the promotion of sustainable modes of transport. In the absence of any mitigation, works involved in the installation of bus shelters have the potential to generate a range of slight environmental effects, including noise impacts, local air quality impacts (through the generation of construction dust), impacts on water quality (through the run-off of silt and cement based products during construction) and biodiversity impacts. The delivery of this action has the potential to have a positive effect on population and human health through the promotion of modes of travel that reduce GHG emissions when compared to single vehicle options.
T1.10	Support the implementation of the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS).	LSMATS aims to upgrade the current transport options available in the region in an environmentally sustainable manner. Improvements include improvements to bus, rail, cycle, and private transport options and may include significant development in the region. In the absence of any mitigation, such large-scale infrastructural projects have the potential to generate a wide variety of negative environmental effects - that range from slight in magnitude to profound - on, inter alia, ecological receptors, the soils and geological environment and the water environment.
T1.11	Engage with public transport providers to support enhanced public transport (bus and rail) outcomes including rural bus service expansion and service interconnectivity, whilst advocating and exerting influence to ensure such projects promote climate action benefits and co-benefits, and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.	This is an engagement related action and will not have any real environmental effect when considered in isolation. Depending on the nature and level of engagement, this action could lead to positive environmental outcomes, in addition to positive public transport related outcomes.
T2.2	Increase procurement of electric light good vehicles in Clare County Council vehicle fleet.	This action has the potential to increase the uptake in Electric Vehicles and will support a modal shift and reduction in vehicle related GHG emissions. Electric vehicles have the potential to generate a variety of uncertain lifecycle impacts, including production related impacts and end-of-life related.
T2.3	Conduct feasibility study and integration of renewable alternative fuel options for Clare County Council vehicle fleet.	This action could lead to the LA transitioning its vehicle fleet to a renewable fuel. The scalable adoption of vehicles based on certain alternative fuels may contribute to the expansion of alternative fuel production sectors. These sectors may indirectly cause environmental effects (including uncertain and potentially negative effects) as a result of fuel sourcing, production and supply processes.
C2.5	Support an increase the number of Sustainable Energy Communities established in Clare.	This promotional/engagement action will support the effective delivery of climate action in the community. The adoption of this action will support the full realization of the plan vision in the community. The carrying out of the type of energy efficiency upgrades or small-scale renewable energy development supported by this programme has some potential to have negative localized effects - such as localized impacts on biodiversity, in the absence of mitigation.

Action Reference	Original Action	Recommendations integrated into the Plan, included in:
C2.6	Supporting County Clare in transitioning to a more sustainable tourism destination as actioned in the Clare Tourism Strategy 2030 through the measurement and monitoring of sustainable indicators.	This promotional action will support sustainable initiatives within the County. The action has the potential to have a net positive effect for climate action and awareness within the County. Recreational activity in natural spaces such as rivers and beaches are not inherently damaging. However, there are known impacts associated with inappropriately managed activities in sensitive habitats such as Dune systems. Therefore, the promotion of access and engagement with waterways and natural spaces needs to be carefully considered. Similarly, infrastructure works such as culverting could have unintended consequences on water quality and associated aquatic habitats and species. If implemented correctly this action is likely to have moderate positive environmental effect in terms of water quality improvements, engagement with nature and biodiversity enhancements. The action should take into account other environmental factors such as biodiversity and environmental health.
C2.7	Supporting the engagement of tourism businesses in North Clare with the Geopark Code of Practice for Sustainable Tourism Businesses through the implementation of the Burren and Cliffs of Moher UNESCO Global Geopark's Management Plan 2024 – 2029.	This promotional action will support sustainable initiatives within the County. The action has the potential to have a net positive effect on climate action and awareness within the County. Recreational activity in natural spaces such as rivers and beaches is not inherently damaging. However, there are known impacts associated with inappropriately managed activities in sensitive habitats such as Dune systems. Therefore, the promotion of access and engagement with waterways and natural spaces needs to be carefully considered. Similarly, infrastructure works such as culverting could have unintended consequences on water quality and associated aquatic habitats and species. If implemented correctly this action is likely to have moderate positive environmental effects in terms of water quality improvements, engagement with nature and biodiversity enhancements. The action should take into account other environmental factors such as biodiversity, cultural heritage, amenity value, and environmental health.
N1.3	Support and engage with locally and nationally led European Innovation Partnership (EIP) & Priority Action Areas projects in County Clare with biodiversity, climate, and community benefits	This action may lead to the carrying out of climate action projects and development that could generate a range of slight to significant positive environmental effects, including positive effects on climate, water quality, the soils environment, biodiversity and population and human health. In the absence of mitigation, the carrying out of climate action related development may have unintended negative environmental effects.
N1.8	Support and work with landowners to undertake a peatland restoration project.	This action will have a moderate to significant positive effect for climate action, biodiversity, and environmental/ecosystem health. Such a project, if not appropriately designed or implemented, has the potential to have unintended adverse environmental effects, including effects on water quality and hydrology, biodiversity, European sites and the soils environment.

Action Reference	Original Action	Recommendations integrated into the Plan, included in:
N1.10	Develop and implement a policy for the use of chemical pesticides and herbicides across all Clare County Council assets.	This action has the potential to have wide ranging slight to moderate effects on local biodiversity, water quality, soil, flora, fauna, etc. Limiting and regulating the use of herbicides and pesticides would prevent to some degree the occurrence of environmental pollution incidents due to the use of these substances. The negative environmental effect of the continued use of such substances is potentially significant, given the hazardous properties of these substances.
N2.5	Work with Irish Water and LAWPRO (Local Authority Waters Programme) to identify the impacts of critical and vulnerable receptors in accordance with the River Basin Management Plan and Water Framework Directive and support the implementation of all relevant remediation and mitigation measures.	This action will promote good water quality initiatives, with the potential to positively affect the environment where remediation measures are considered. It has the potential to generate a positive effect for sensitive environmental receptors that are at risk of - or currently are - being negatively impacted by water quality stressors.
N2.7	Undertake and expand upon air quality monitoring capabilities.	This is a monitoring related action and will not have a real environmental effect when considered in isolation. The action will facilitate better tracking of ambient air quality in the local authority area.
N3.2	Investigate the development of composting centres to promote circularity of green waste and support development of community gardens and allotments.	This action is likely to promote effective waste management and waster/material circularity. Any measures that improve resource efficiency/circularity will broadly support the reduction of lifecycle GHG emissions associated with the production of materials and goods. This is likely to result in a positive environmental effect generally. The construction and operation of composting facilities has the potential to generate a variety of slight to significant negative environmental effects, including noises.
DZ-BE1	Support the development of a feasibility study for an anaerobic digestion system to produce biogas and organic fertiliser.	The action itself will not have a real environmental effect. The consequent development of an Anaerobic Digestion facility that the action may lead to could result in a variety of environmental effects, including potential positive climate and material asset related effects, and potential negative construction or operational effects, including effects on biodiversity, local odour effects, noise effects and traffic and transport related effects.
DZ-BE2	Flood Risk: Completion of the Kilkee Flood Relief Scheme.	The progression of this flood resilience related action has the potential to lead to significant development taking place. In the absence of any mitigation, such development could potentially have a variety of significant, negative environmental effects, including effects on: water quality, biodiversity, including flora and fauna reliant on aquatic eco-systems; the receiving air environment (due to the generation of construction dust) and the receiving noise environment (due to the generation of construction phase noise). Flood resilience action has the potential to have positive environmental effects. The possible development of nature based solutions and SuDS as part of a flood risk management policy has the potential to have slight to significant, positive effects on biodiversity and water quality.

Action Reference	Original Action	Recommendations integrated into the Plan, included in:
		The delivery of flood resilience action has the potential to reduce flood risk and prevent future flood events. Reducing flood risk can generate significant, positive effects for a variety of environmental receptors that could be negatively impacted by flood events; such as ecological receptors. The implementation of a flood management policy is likely to have slight to significant positive effects on the receiving soils environment - through the prevention of erosion. This may also have a beneficial impact on inter-related environmental components that could potentially be impacted by fluvial erosion.
DZ-BE4	Support the upgrading of the wastewater treatment plant in Kilkee	This is an advocacy-based action. The action itself will not have a real environmental effect. The consequent development of a WWTP that the action could result in a variety of environmental effects, including potential positive water quality and aquatic ecology related effects, and potential negative construction or operational effects, including effects on biodiversity, local odour effects, noise effects and traffic and transport related effects.
DZ-BE6	Advance the installation of private and community solar PV systems on agriculture, residential, commercial and/or public locations.	Developing such installations will lead to a reduction in GHG emissions. The development of PV panels on buildings has the potential to result in negative glint and glare impacts on sensitive environmental receptors.
DZ-BE7	Undertake energy audit of Cuturlann McSweeny to identify energy efficiency opportunities to contribute towards LA targets	This is a study-based action and will not have any real environmental effect in and of itself. The completion of the audit will, however, support retrofitting works at the building and may contribute toward achieving GHG emission reductions and energy efficiency if successfully implemented. There is the potential for light and air pollution during retrofitting works.
DZ-BE8	Undertake energy retrofitting of social housing stock across the DZ.	This action will support the reduction of Residential sector GHG emissions. The action is likely to have a slight positive environmental effect - having regard to the share of GHG emission reductions that can be supported via this action relative to national GHG emission reduction targets and requirements. There is the potential for light and air pollution during retrofitting works. Retrofitting works may also negative effect the appropriate conservation of protected structures. Therefore, there is also scope for there to be negative effects if unmitigated.
DZ-BE10	Advance coverage of Sustainable Energy Communities initiative across all the DZ.	This promotional/engagement action will support the effective delivery of climate action in the community. The adoption of this action will support the full realization of the plan vision in the community. The carrying out of the type of energy efficiency upgrades or small-scale renewable energy development supported by this programme has some potential to have negative localized effects - such as impacts on protected structures, or localized impacts on visual amenity or biodiversity, in the absence of mitigation.
DZ-T1	Advance the delivery of the West Clare Railway Greenway.	This action supports the development of additional green infrastructure. In the absence of any mitigation, works involved in the construction of such infrastructures have the potential to generate a range of slight to significant environmental effects, including noise impacts, local air quality

Action Reference	Original Action	Recommendations integrated into the Plan, included in:
		impacts (through the generation of construction dust), impacts on water quality (through the run-off of silt and cement based products during construction), biodiversity impacts, cultural heritage asset impacts and impacts on traffic and transport (through the temporary creation of traffic diversions and congestion). The delivery of an expanded, safe active travel network has the potential to promote the use of sustainable and active travel modes in the community, encourage modal shift and support the reduction of vehicle related emissions. This is likely to have a slight to moderate positive environmental effect - having regard to the share of GHG emission reductions that can be supported via this action relative to national GHG emission reduction targets and requirements.
DZ-T2	Deliver active travel projects across the DZ.	This action supports the development of additional active travel infrastructure. In the absence of any mitigation, works involved in the construction of additional active travel infrastructure have the potential to generate a range of slight to significant environmental effects, including noise impacts, local air quality impacts (through the generation of construction dust), impacts on water quality (through the run-off of silt and cement based products during construction), biodiversity impacts, cultural heritage asset impacts and impacts on traffic and transport (through the temporary creation of traffic diversions and congestion).
DZ-T3	Support the installation of electric vehicle charging points across the DZ including Kilkee, Loop Head Lighthouse, Kilrush and Vandeleur Walled Gardens.	The expansion of the EV charging network will lead to the development of multiple charging points and ancillary electrical infrastructure including grid connection routes across the extent of the local authority's functional area. In the absence of any mitigation, works involved in the construction of additional charging point infrastructure have the potential to generate a range of slight to significant environmental effects, including noise impacts, local air quality impacts (through the generation of construction dust), impacts on water quality (through the run-off of silt and cement based products during construction), and biodiversity impacts. The delivery of good network of charging infrastructure has the potential to promote the use of sustainable travel modes in the community, encourage modal shift and support the reduction of vehicle related emissions. This is likely to have a slight to moderate positive environmental effect - having regard to the share of GHG emission reductions that can be supported via this action relative to national GHG emission reduction targets and requirements.
DZ-T4	Support the installation of community-led electric vehicle charging points across the DZ.	The expansion of the EV charging network will lead to the development of multiple charging points and ancillary electrical infrastructure including grid connection routes across the extent of the local authority's functional area. In the absence of any mitigation, works involved in the construction of additional charging point infrastructure have the potential to generate a range of slight to significant environmental effects, including noise impacts, local air quality impacts (through the generation of construction dust), impacts on water quality (through the run-off of silt and cement based products during construction), and biodiversity impacts.

Action Reference	Original Action	Recommendations integrated into the Plan, included in:
		The delivery of good network of charging infrastructure has the potential to promote the use of sustainable travel modes in the community, encourage modal shift and support the reduction of vehicle related emissions. This is likely to have a slight to moderate positive environmental effect - having regard to the share of GHG emission reductions that can be supported via this action relative to national GHG emission reduction targets and requirements.
DZ-CP1	Support the development of local food production and farm enterprises in the DZ (e.g., Loop Head Farm to Fork).	Support local food production could potentially increase the amount of locally produced food bought and consumed, and decrease the amount of food sourced from afar. This action therefore has the potential to reduce lifecycle GHG emissions associated with food production and supply, leading to a slight positive effect on climate. The carrying out improper or unsustainable food production practices in a local context may result in negative environmental effects, including negative effects on water quality, the receiving environment or biodiversity.
DZ-CP4	Support businesses to prevent, reduce and separate waste generated through Kilkee Green Business Hub.	This action is likely to promote effective waste management and waster/material circularity. Any measures that improve resource efficiency/circularity will broadly support the reduction of lifecycle GHG emissions associated with the production of materials and goods. This is likely to result in a positive environmental effect generally.
DZ-N2	Support the development of a biodiversity walking and cycling route to enhance and raise awareness of local biodiversity	This is a biodiversity based action that will serve to underpin and support other actions contained in the plan. Should this action lead to the construction of built development, the construction activities associated with the development result in negative environmental effects, including negative water quality, noise and dust related effects, or effects on biodiversity or European sites.

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

Promote climate action projects that support and maximize environmental co-benefits, such as biodiversity protection and enhancement; improved air, water or soil quality; or enhanced recreation, amenity and cultural heritage value, to ensure win-win benefits are gained.
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.
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.
Flood and coastal defense 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.
Ensure climate action related projects are carried out in a manner that promotes climate action-cultural heritage co-benefits, and do not result in unauthorized physical damage to cultural, archaeological or architectural features, or unauthorized or inappropriate alteration of the context of sensitive cultural heritage features.
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.

3. CONSIDERATION OF ALTERNATIVES

3.1 Introduction

This section provides an over 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.

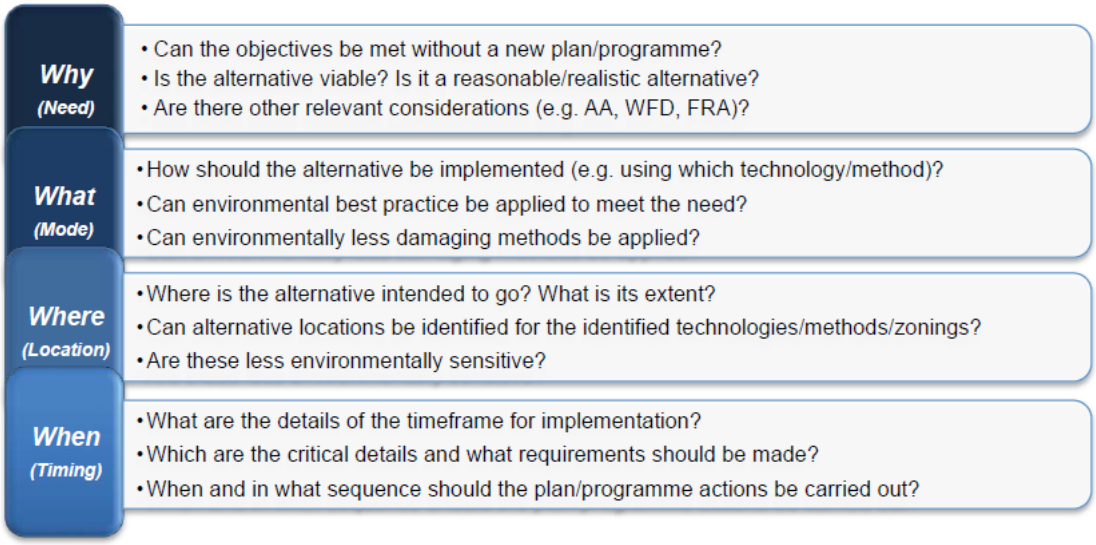

Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3 Developing and Assessing Alternatives in the Strategic Environmental Assessment Process (EPA, 2015).

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
Alternative 1 - The Pareto Approach: Prioritize reducing GHG emissions from largest GHG emitting sectors to mitigate against climate change impacts.	This alternative involved developing a LACAP that primarily focusses on climate mitigation and reducing GHG emissions associated with the largest GHG emitting sectors in the County that a local authority can reasonable influence having regard to the functions of a local authority - the Residential and Transport sectors.	This was a viable alternative that could achieve a significant reduction in GHG emissions by prioritizing and supporting climate mitigation related action for the Residential and Transport sectors. The alternative would cover the period from 2024 to 2029 (the duration of the prospective LACAP).
Alternative 2 - The Holistic Approach: Adopt a multi-pronged approach and focus on a range of priority areas to mitigate against and adapt to climate change impacts.	This alternative involved developing a LACAP that has a balanced focus on both climate mitigation and adaptation across several theme areas and all socio-economic sectors.	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). This alternative will promote the creation of a range of climate action co-benefits, including potentially co-benefits for biodiversity and European sites.
Alternative 3 - The Holistic and Participatory Approach (Current LACAP): Adopt a multi-pronged approach - that has a strong community engagement emphasis - and focus on a range of priority areas to mitigate against and adapt to climate change impacts.	This alternative involved developing a LACAP that has a balanced focus on both climate mitigation and adaptation across several theme areas and all socio-economic sectors, and which has a strong community engagement emphasis, which underpins, supports and drives the climate action contained in the plan.	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). This alternative will promote the creation of a range of climate action co-benefits, including potentially co-benefits for biodiversity and European sites.

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 of 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 Clare 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 Clare 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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