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LOCAL AUTHORITY CLIMATE ACTION PLAN

Appropriate Assessment Conclusion Statement

Prepared for:
Wexford County Council



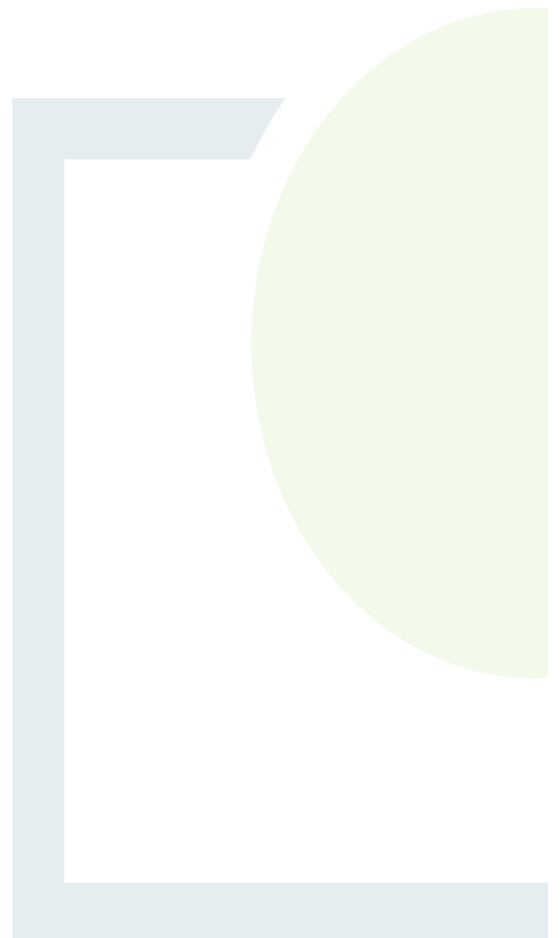
Date: February 2024

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APPROPRIATE ASSESSMENT CONCLUSION STATEMENT

REVISION CONTROL TABLE, CLIENT, KEYWORDS AND ABSTRACT

User is responsible for Checking the Revision Status of This Document

Rev. No.	Description of Changes	Prepared by:	Checked by:	Approved by:	Date:
1	Final	RD/AMW/MG	RD	AT	15/02/2024

Client: Wexford County Council

Keywords: Appropriate Assessment, AA, AA Conclusion Statement, Natura Impact Report, Local Authority Climate Action Plan.

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

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1. INTRODUCTION

1.1 Background

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

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

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

1.2 Requirements in relation to AA Conclusion Statements

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

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

¹ This NIR provides the following information:

- Sufficient detail of the LACAP to make clear its size, scale and objectives.
- A description of baseline conditions, conservation objectives, and relevant ecological and environmental issues in relation to relevant European sites that be affected by plan implementation (in the absence of mitigation).
- Potential adverse impacts of the Plan on the relevant European sites.
- How those environmental effects will be avoided and prevented through mitigation.



2. HOW THE FINDINGS OF THE AA WERE INTEGRATED INTO THE LACAP

2.1 Integrated Biodiversity Assessment Approach

The environmental assessment for the Plan undertaken was carried out in accordance with an Integrated Biodiversity Impact Assessment based methodology in accordance with EPA's guidance document entitled '*Final Report: Integrated Biodiversity Impact Assessment, Streamlining AA, SEA and EIA Processes. Best Practice Guidance.*' (2012).

The methodology employed facilitated the integration of SEA and AA processes relating to biodiversity impact assessment to ensure the effective and streamlined assessment of biodiversity impacts. The plan-making, SEA and AA processes - including scoping, baseline evaluation, impact assessment and mitigation/monitoring measure development processes - were carried out concurrently to facilitate holistic and complete assessment of biodiversity impacts. The effective communication and integration of scientific knowledge and analysis between assessments took place. The SEA was suitably informed by the analysis and conclusions in AA.

2.2 Mitigation through integration of environmental considerations into the LACAP

The plan making process was carried out in parallel with the SEA and AA processes. Regular communication and interaction took place between the environmental assessment team and the plan making team. Environmental considerations that came to light during the SEA and AA processes, including consultation processes, were regularly communicated to the plan making team during the plan making process. As necessary, environmental mitigation measures to ameliorate the potential negative environmental effects of implementing the LACAP were developed and then integrated into the LACAP. Much of the environmental mitigation was embedded in the plan early on in the process as a result of this. This process was carried out in an iterative manner to ensure optimal plan making and environmental outcomes. Environmental considerations were also integrated into the plan so as to facilitate maximizing identified positive environmental effects of the LACAP.

Mitigation measures were suggested that maximize the co-benefits of climate action for other environmental components such local air quality, human health, biodiversity, water quality and other interrelated areas (i.e., win-win solutions).

Additional text clarifying environmental protection related obligations and environmental enhancement opportunities has been attached to a variety of defined actions in the plan. This text has been shaped to ensure that environmental considerations are appropriately taken into account during plan implementation. This text has also been shaped to ensure plan implementation generates the minimum level of negative environmental effects and the maximum level of positive environmental effects. These text additions - relevant to AA - are presented in Table 2-1.

Several environmental governance principles were established to ensure plan implementation generates the minimum level of negative environmental effects and the maximum level of positive environmental effects. These environmental governance principles shall underpin and guide plan implementation and shall apply to and be integrated into all actions/activities which result due to the implementation of the plan. These principles are defined in Table 2-2. The principles were incorporated into the plan itself.

These environmental mitigation measures were integrated into the LACAP and will prevent negative effects and maximize positive effects associated with the LACAP.



The risks to the safeguarding and integrity of the qualifying interests, special conservation interests and conservation objectives of the European sites have been addressed by the inclusion of these mitigation measures.

Multiple actions as originally defined in the Plan will also serve to benefit the biodiversity environment, including a variety of biodiversity enhancement related actions, climate adaptation related actions, and actions designed to reduce GHG emissions and local air pollution.



Table 2-1: Proposed Environmental Mitigation Measures - Additional text included in Plan actions relating to environmental protection related obligations and environmental enhancement opportunities

Action Reference	Original Action	Recommendations integrated into the Plan, included in:
GL5	Wexford County Council commits to a reduction in fossil fuel based travel by 25% by 2029, to be achieved by a combined increased in online technology, sustainable transport options together with a concerted effort to reduce travel.	Attach the following text to the action: "while ensuring sustainability criteria is appropriately considered during procurement processes and appropriate end-of-life vehicle management practices are in place."
GL10	In line with Strategic Objective 2 of the South east Regional Enterprise Plan 2024, continue the work to establish the South East as a leader in Off-shore renewable Energy	Attach the following text to the action: "whilst advocating and exerting influence to ensure supported projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects."
BET1	Identification and completion of energy efficiency and upgrade projects related to council facilities as identified in the Pathfinder Energy Register of Opportunities and other funding streams	Attach the following text to the action: "having due regard to environmental sensitivities such as local human receptors, protected species, European sites and biodiversity, and the need to appropriately protect and conserve protected structures."
BET2	Continue to work with OPW Flood Defence section to progress all County Wexford Flood Relief Schemes e.g., Wexford Town, Enniscorthy, Rosslare Strand	Attach the following text to the action: "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."
BET3	Reduce WCC fossil fuel emissions across its fleet through: a) Maximising the EV fleet and continuing to upgrade the existing older fleet to modern efficient vehicles. b) Assessing the feasibility of moving to renewable or low emission fuels for fleet vehicles and marine vessels and piloting the roll out of Hydrotreated Vegetable Oil fuel. c) Promote & encourage fuel saving measures such as eco driving & speed limiters, etc. d) Increase the tonnage carrying capacity of fleet lorries which will reduce the number of trips. Quantify and verify the GHG emission reductions achieved by adopting this action	Attach the following text to the action: "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."



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
BET4	Maximise WCC's delivery of upgraded properties under the Energy Efficiency Retrofit Programme in line with department targets	Attach the following text to the action: "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."
BET5	Continue to support the roll out of the Public lighting retrofit Programme.	Attach the following text to the action: "while ensuring the lumen levels and spectral range are maintained or reduced/controlled to avoid effects to biodiversity."
BET6	Preparation of the Wexford Town Local Transport Plan to inform the future planning of Wexford Town and to inform the preparation of the Wexford Town Local Area Plan	Attach the following text to the action: "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."
BET7	Revise & update Wexford County Council Draft Electric Vehicle Charging Infrastructure Strategy to take account of national guidance and work with ZEVl to facilitate the EV Charging Infrastructure within the public realm of County Wexford for Cars, buses & coaches having due regard to ensuring disabled access to EV charging, and environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage.	Attach the following text to the action: "having due regard to ensuring disabled access to EV charging, and environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage."
BET8	Work with Catchment Flood Risk Assessment Management Programme to prioritise projects to reduce flood risk and provide for detailed mapping of areas prone to fluvial and tidal flood risk. The National Indicative Fluvial Mapping (NIFM) and the National Coastal Hazard Flood Mapping are published and will help inform the implementation of this plan 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.	Attach the following text to the action: "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."



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
BET9	Support the roll out Active travel initiatives and promote a modal shift to more sustainable travel through: a) Pathfinder projects - 3 interconnecting schemes - Newtown Road, Beech Lawns/Clonard and Roxborough, Wexford Town. b) Safer Routes to schools' schemes across County Wexford. Twenty six schools in conjunction with the National Transport Authority and An Taisce. c) Installation of segregated cycle path and footpath as part of Oaklands to Kents Cross New Ross Active Travel Scheme	Attach the following text to the action: "having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage."
BET12	Develop New Designed Road Schemes (that involves more than resurfacing) by securing specific improvement grants that encompass urban realm planned improvements, such as natural drainage, cycle tracks, green spaces, led lights, restricting cars etc.	Attach the following text to the action: "having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage."
BET13	Develop projects to promote adaptive reuse of historic structures using exemplar retrofitting projects and carbon budgets to demonstrate climate value	Attach the following text to the action: "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."
BET14	Facilitate and support the use and occupation of vacant housing stock through the administration of the vacant property Refurbishment Grant under the Government of Ireland Housing for All Plan (Croí Cónaithe)	Attach the following text to the action: "having due regard to protected species, biodiversity, European sites and the need to appropriately conserve protected structures."
BET15	Carry out Climate Risk assessment of historic sites and structures and build climate resilience of archaeological and architectural heritage in public and private ownership through schemes such as at the Built Heritage Scheme, Historic Towns Initiative, Irish Walled Towns Network, Community Monuments Fund and Historic Structures Fund 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.	Attach the following text to the action: "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."



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
BET17	Promote reuse/repurposing of existing buildings rather than the construction of new buildings through various funding streams including Urban Regeneration Development Fund and Rural Regeneration Development Fund e.g., New Ross Enterprise Centre and Gorey Market House	Attach the following text to the action: "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."
BET18	Continue to progress the roll out of an integrated network of Greenways, Blueways and key trails within County Wexford and across the South east region	Attach the following text to the action: "having due regard to opportunities to enhance tourism, recreation and cultural heritage value associated with routes, and environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites, and cultural heritage related sensitivities."
BET19	Engage with Rosslare Europort stakeholders to progress the development of Rosslare as a renewable energy hub.	Engage with Rosslare Europort stakeholders to progress the development of Rosslare as a renewable energy hub; having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage
BET20	Through the planning process, promote the target of 100% electricity consumption in the county from renewable sources by 2027	Attach the following text to the action: "where it is confirmed through appropriate environmental assessment that associated renewable energy development will not have any significant environmental effect."
BET21	Incorporate Sustainable Urban drainage (SUDs) in proposed designs and Raise awareness and provide training to staff	Attach the following text to the action: "ensuring all SuDS related construction works are designed and implemented in a manner that does not result in the occurrence of significant adverse environmental effects."
BET23	In accordance with the Wexford County Development Plan 2022-2028, and all future Local Area Plans/Settlement Plans, require the provision of electric vehicle charging point infrastructure in residential, commercial and mixed use developments	Attach the following text to the action: "having due regard to ensuring disabled access to EV charging, and environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage."
BET24	Support and facilitate transport providers in delivering appropriate improvements in the bus and rail services to improved connectivity for Wexford, in particular those identified for the South east region and Wexford as outlined in the Department of Transport and Department for Infrastructure All-Island Strategic Rail Review whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene	Attach the following text to the action: "whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects."



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	relevant environmental protection criteria or cause significant negative environmental effects.	
BET30	Replace all network equipment (Switches, Routers, Hubs) with most energy efficient models on the market	Attach the following text to the action: "whilst ensuring WEEE generated as a result of this action is appropriately managed."
NEGI2	Wexford County Council will develop and progress suitable coastal protection measures, as identified through the monitoring and inspection programmes for vulnerable areas of coast and existing public coastal defences subject to funding, statutory consent and national policies and guidelines, including schemes such as Rosslare, Courtown and Seaview.	Attach the following text to the action: "having due regard to the need to promote nature based solutions and Sustainable Drainage Systems, and environmental sensitivities associated with coastal areas such as the receiving marine environment, biodiversity, European sites, recreation and amenity value"
NEGI3	Undertake a Monitoring and Maintenance programme on existing public coastal defences and develop suitable protection measures.	Attach the following text to the action: "having due regard to environmental sensitivities associated with coastal areas such as the receiving marine environment, biodiversity, European sites, recreation and amenity value"
NEGI5	To identify, protect and manage green infrastructure in future local area plans.	Attach the following text to the action: "having due regard to environmental sensitivities such as archaeology, European sites, biodiversity and amenity value, and the potential to enhance ecologically connectivity."
NEGI6	Review all Non-Uisce Eireann Wastewater sites operated by WXCC for stormwater infiltration issues in order to reduce the impact of flooding at Wastewater TP as a result of increased rainfall and carry out resolution works to separate stormwater from the foul wastewater systems at non-Uisce Eireann sites in order to reduce pollution as a result of rainfall events	Attach the following text to the action: "having due regard to environmental sensitivities such as European sites, biodiversity and amenity value."
NEGI10	Implement Chapter 12 Coastal Zone Management and Marine Spatial Planning in Volume 1 of the County Development Plan. Ensure collaborations with Waterford and Wicklow County Councils in relation to integrated Coastal Zone management	Attach the following text to the action: "having due regard to the need to promote nature based solutions and Sustainable Drainage Systems, and environmental sensitivities associated with coastal areas such as the receiving marine environment, biodiversity, European sites, recreation and amenity value"
NEGI12	Work through the Multi Annual Rural Water Programme to improve access to public water services to reduce pollution and vulnerability to water scarcity as a result of climate change	Attach the following text to the action: "having due regard to environmental sensitivities such as European sites, biodiversity and amenity value."



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
NEGI16	Promote climate action projects that support and protect habitats such as wetlands and floodzones which contribute to green infrastructure.	Attach the following text to the action: "having due regard to environmental sensitivities such as European sites, biodiversity and amenity value."
NEGI22	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.	Attach the following text to the action: "having due regard to environmental sensitivities such as European sites, biodiversity and amenity value."
CRT13	Promotion of the Rural Water programme in providing support to rural communities for private well grant improvements and Group Schemes	Attach the following text to the action: "whilst advocating and exerting influence and control, as appropriate, to ensure such projects are designed and planned properly and do not cause unintended negative environmental effects."
DZ GL4	Maximise WCC's delivery of upgraded properties within Enniscorthy DZ, under the Energy Efficiency Retrofit Programme in line with department targets, to a minimum of a B2 BER rating. All properties being let shall include a BER	Attach the following text to the action: "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."
DZ BET1	Work with Special Projects, the Active Travel Team and the people of Enniscorthy on the Enniscorthy Town Centre Regeneration Plan (TCRP)	Attach the following text to the action: "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."
DZ BET3	Production of the Enniscorthy Area Local Transport Plan and identification of measures for implementation	Attach the following text to the action: "whilst ensuring the plan is: - 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."
DZ BET5	Produce a feasibility study on the provision of Park and Ride in Enniscorthy	Attach the following text to the action: whilst having appropriate regard to traffic and transport, planning and environmental constraints and considerations.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
DZ BET6	Investigate the feasibility of adding bus stops to existing services, at a number of locations including Enniscorthy quays for all north bound coaches/buses and at the R772 north of Blackstoops roundabout.	Attach the following text to the action: "whilst having due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites, cultural heritage."
DZ BET8	Active Travel Project at St. Aidan's National School, based on the Safe Routes to School Scheme	Attach the following text to the action: "having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality, cultural heritage."
DZ BET9	Investigate the viability of an outdoor escalator on streets with steep gradients	Attach the following text to the action: while having due regard to planning, environmental and cultural heritage considerations.
DZ BET12	Liaise with the District Heating Steering Group on the possible identification of potential sites for a District Heating System in Enniscorthy	Attach the following text to the action: "Liaise with the sustainable District Heating Steering Group on the possible identification of potential sites for a Sustainable District Heating System in Enniscorthy, whilst advocating and exerting influence to ensure the project is suitably located having regard to planning and environmental constraints and considerations."
DZ BET13	Estimate the solar potential within Enniscorthy DZ and the associated costs	Attach the following text to the action: "having appropriate regard to planning and environmental protection considerations, including potential glint and glare impacts."
DZ BET14	Liaise with the Schools within the DZ in relation to solar PV installation	Attach the following text to the action: "having appropriate regard to planning and environmental protection considerations, including potential glint and glare impacts."
DZ BET15	Investigate the feasibility of small scale renewable energy projects such as solar and wind	Attach the following text to the action: "whilst ensuring the study has appropriate regard to planning and environmental protection constraints and considerations."
DZ BET16	Work with the Heritage Section and Enniscorthy Municipal District to repurpose and reuse existing vacant buildings and investigate the possibility of using new sustainable insulation products within existing Enniscorthy Heritage Buildings	Attach the following text to the action: "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."
DZ BET17	Investigate the feasibility of companies cofounding a high speed electric vehicle charger for use by companies within their own industrial estate	Attach the following text to the action: "having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage."



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
DZ BET18	LED replacement for council street lights within Enniscorthy DZ	Attach the following text to the action: "while ensuring the lumen levels and spectral range are maintained or reduced/controlled to avoid effects to biodiversity."
DZ NEGI1	Work with the Local Authority Waters Programme (LAWPRO) on the Slaney Pilot catchment Management Plan and Catchment Fora to facilitate greater public participation in water management, under the River Basin Management Plan 2022-2027	Attach the following text to the action: "and support the implementation of all relevant remediation and mitigation measures required to maintain or achieve good or high quality water status in the County."
DZ NEGI3	Expand and promote Enniscorthy Recycling Centre to become a re-use circular economy hub	Attach the following text to the action: "whilst ensuring activities at the facility are carried out in accordance with the Waste Management Act and the environmental management and protection related conditions contained in the waste facility permit for the facility."



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>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>Promote and encourage use of sustainable transport modes on all journeys undertaken as part of work by council personnel, as well as ensure that the journey is necessary.</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.

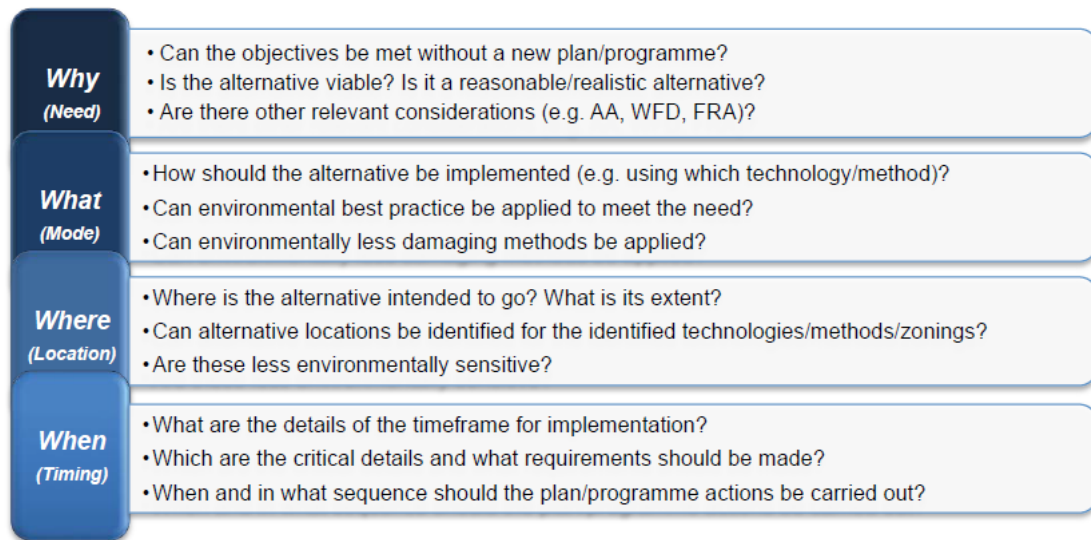


Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3 Developing and Assessing Alternatives in the Strategic Environmental Assessment Process (EPA, 2015).

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 Wexford 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 Wexford 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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