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LOCAL AUTHORITY CLIMATE ACTION PLAN

Appropriate Assessment Conclusion Statement

Prepared for:
Roscommon 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 Roscommon Local Authority Climate Action Plan to Roscommon for publication alongside the Plan.

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1. INTRODUCTION

1.1 Background

This is the Appropriate Assessment (AA) Conclusion Statement for the Roscommon 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.



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:
BET 2	Implement prioritised SEAI Pathfinder projects in RCC including Aras an Chontae, Dillon House Library, Roscommon Leisure Centre, Roscommon Arts Centre and Roscommon Library and progress remaining buildings identified in Energy Audit process, prioritising significant energy users. Progress Public Lighting Energy Efficiency Project in support of energy efficient public lighting. Incorporate additional energy saving measures in consultation with local communities	Implement prioritised SEAI Pathfinder projects in RCC including Aras an Chontae, Dillon House Library, Roscommon Leisure Centre, Roscommon Arts Centre and Roscommon Library and progress remaining buildings identified in Energy Audit process, prioritising significant energy users. Progress Public Lighting Energy Efficiency Project in support of energy efficient public lighting. Incorporate additional energy saving measures in consultation with local communities; having due regard to protected species, biodiversity, European sites and the need to appropriately conserve protected structures.
BET 3.A	Manage energy efficiency and vacancy levels in Local Authority housing stock in accordance with the Housing Strategy and national retrofit programme. Include energy awareness and management information in pre-tenancy training and to existing and prospective tenants as part of retrofits/energy upgrades where applicable	Manage energy efficiency and vacancy levels in Local Authority housing stock in accordance with the Housing Strategy and national retrofit programme. Include energy awareness and management information in pre-tenancy training and to existing and prospective tenants as part of retrofits/energy upgrades where applicable; having due regard to protected species, biodiversity, European sites and the need to appropriately conserve protected structures.
BET 3.B	Promote the development of suitable alternative energy projects in appropriate areas, including on degraded lands in RCC ownership (e.g., historic landfill sites) and particularly those developed and run by communities aligned with the SEC programme and in accordance with the adopted RCC renewable energy strategy (CDP)	Promote the development of suitable alternative energy projects in appropriate areas, including on degraded lands in RCC ownership (e.g., historic landfill sites) and particularly those developed and run by communities aligned with the SEC programme and in accordance with the adopted RCC renewable energy strategy (CDP); <ul style="list-style-type: none"> • having due regard to landscape and visual amenity and environmental sensitivities such as biodiversity, noise environment, air environment and European Sites. • Where it is confirmed through a glint and glare assessment that any solar development will not have any potential glint and glare impact on sensitive receptors, or otherwise, where it is confirmed that any solar development constitutes exempted development under the Planning and Development Regulations by virtue of its size or location outside a Solar Safeguarding Zone.
BET 6	Review RCC fleet management and composition in the context of required emissions reductions and in accordance with the Reimagining fleet strategy. Implement changes in line with recommendations.	Review RCC fleet management and composition in the context of required emissions reductions and in accordance with the Reimagining fleet strategy. Implement changes in line with recommendations.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	Provide training on fleet operation including emissions reducing measures.	Provide training on fleet operation including emissions reducing measures. Promote fleet sustainability.
BET 7	Investigate the potential for the extension of the EV and renewable CNG networks and provision of alternatives to the current diesel fuelled HGV fleet. RCC opposes the use of gas from fracked sources in the fuel mix.	Investigate the potential for the extension of the EV and renewable CNG networks and provision of alternatives to the current diesel fuelled HGV fleet. RCC opposes the use of gas from fracked sources in the fuel mix, having due regard to relevant environmental sensitivities and available grid/mains capacity.
BET 8	Review modal split for staff and Council Activities through the development and implementation of a Workplace Travel Plan in conjunction with NTA Smarter Workplaces. Develop a pilot Mobility Hub project for RCC staff in this regard and apply learning to potential external initiatives.	Review modal split for staff and Council Activities through the development and implementation of a Workplace Travel Plan in conjunction with NTA Smarter Workplaces. Develop a pilot Mobility Hub project for RCC staff in this regard and apply learning to potential external initiatives; having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, sensitive human receptors and traffic and transport conditions.
BET 9	In line with EV strategy findings and recommendations, facilitate enhanced access to charging infrastructure throughout the County	In line with EV strategy findings and recommendations, facilitate enhanced access to charging infrastructure throughout the County; having due regard to relevant environmental sensitivities and available grid/mains capacity.
BET 10	Facilitate the prioritised expansion of active travel projects in line with NTA/TFI strategy in high impact urban areas such as Roscommon Town and Athlone. Facilitate the expansion of the local link network in line with the National Transport Investment Framework, Transport for Ireland Strategy and smarter travel initiatives, including advancement of decarbonisation (alternative fuels), physical infrastructure (bus stops, linked cycle and walkways), digital technologies (streamline timetables, payment methods), target dedicated service provision (e.g. education, healthcare, employment, rural) alignment with national, regional and local services and promotion of modal shift	Facilitate the prioritised expansion of active travel projects in line with NTA/TFI strategy in high impact urban areas such as Roscommon Town and Athlone. Facilitate the expansion of the local link network in line with the National Transport Investment Framework, Transport for Ireland Strategy and smarter travel initiatives, including advancement of decarbonisation (alternative fuels), physical infrastructure (bus stops, linked cycle and walkways), digital technologies (streamline timetables, payment methods), target dedicated service provision (e.g. education, healthcare, employment, rural) alignment with national, regional and local services and promotion of modal shift. Promote - through control or influence as appropriate - the carrying out of development supported by this action in a manner that has due regard to: relevant environmental sensitivities, including European sites; and opportunities to promote nature-based solutions and Sustainable Drainage Systems.
BET 11	Implement urban place making initiatives, including the reuse and regeneration of vacant, underused and derelict sites in the urban areas throughout the county in accordance with the CDP, LAPs and emerging Town Centre First policy promoting compact urban growth and vibrancy, facilitating modal shift and creating destination assets to focus benefits of regenerative tourism and protect amenity and heritage assets.	Implement urban place making initiatives, including the reuse and regeneration of vacant, underused and derelict sites in the urban areas throughout the county in accordance with the CDP, LAPs and emerging Town Centre First policy promoting compact urban growth and vibrancy, facilitating modal shift and creating destination assets to focus benefits of regenerative tourism and protect amenity and heritage assets; having due regard to protected species, biodiversity, European sites and the need to appropriately conserve protected structures.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
NEGI 2	Establish holistic linkages between existing, planned and proposed amenity infrastructure and heritage assets within the county to enhance archaeological protection, biodiversity (wildlife corridors), flood resilience (ecosystem services) and increase public awareness (immersion in nature/heritage)	Establish holistic linkages between existing, planned and proposed amenity infrastructure and heritage assets within the county to enhance archaeological protection, biodiversity (wildlife corridors), flood resilience (ecosystem services) and increase public awareness (immersion in nature/heritage), whilst promoting the adoption nature-based solutions and SuDS as appropriate, avoidance of habitat fragmentation, and adherence to environmental protection requirements.
NEGI 3	Engage with stakeholders in peatland and forestry management to align with heritage policy and RCC emergency services fire prevention and response provisions. Prepare guidelines for stakeholder use as appropriate. Engage peatland and forestry stakeholders with initiatives and community projects, identify synergies with JTF programme and areas of “added value” for local communities.	Engage with stakeholders in peatland and forestry management to align with heritage policy and RCC emergency services fire prevention and response provisions. Prepare guidelines for stakeholder use as appropriate. Engage peatland and forestry stakeholders with initiatives and community projects, identify synergies with JTF programme and areas of “added value” for local communities.; 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.
NEGI 6	Engage with external stakeholders, including semi-state bodies, communities, NGOs and private developers to realise renewable energy ambitions and agricultural emissions reductions set out at national, regional and local level	Engage with external stakeholders, including semi-state bodies, communities, NGOs and private developers to realise renewable energy ambitions and agricultural emissions reductions set out at national, regional and local level; 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.
NEGI 7	Establish and coordinate links with relevant state departments, semi-state bodies and advisory agencies in support of the development, application and funding of climate action innovations in operations, service delivery and infrastructural provision (including roads programme) at policy/programme development stage and through targeted education and training programmes in the areas of planning, H&S, roads, regeneration and environment.	Establish and coordinate links with relevant state departments, semi-state bodies and advisory agencies in support of the development, application and funding of climate action innovations in operations, service delivery and infrastructural provision (including roads programme) at policy/programme development stage and through targeted education and training programmes in the areas of planning, H&S, roads, regeneration and environment; whilst advocating and exerting influence to ensure projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.
NEGI 8	Implement the tree management strategy to promote enhanced canopy cover within the County including tree protection measures and planting programmes in Local Authority property. Roll out internal training programmes for relevant council staff and contractors and externally for communities, landowners and potential developers on appropriate planting and maintenance for canopy preservation and biodiversity enhancement. Investigate potential system to monitor planting regimes.	Implement the tree management strategy to promote enhanced canopy cover, with a focus on native trees, within the County including tree protection measures and planting programmes in Local Authority property. Roll out internal training programmes for relevant council staff and contractors and externally for communities, landowners and potential developers on appropriate planting and maintenance for canopy preservation and biodiversity enhancement. Investigate potential system to monitor planting regimes.
NEGI 10	Implement the sustainable management practices for public open spaces report and guidelines in local authority operations and promote education and awareness on the use of herbicides and pesticides to	Implement the sustainable management practices for public open spaces report and guidelines in local authority operations and promote education and awareness on the use of herbicides and pesticides to the public and local communities to protect biodiversity and water quality.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	the public and local communities to protect biodiversity and water quality. Highlight danger of invasive species and develop internal and external educational resources on prevention and biodiversity-aware eradication.	<p>Highlight danger of invasive species and develop internal and external educational resources on prevention and biodiversity-aware eradication:</p> <ul style="list-style-type: none"> Ensure that the invasive species educational resource is developed by a competent ecology team. Ensuring that the educational material regarding herbicides and pesticides promotes use only to a degree that does not cause significant effects on the receiving environment, such as the receiving water environment, biodiversity or European sites.
SRM 5	Prioritise climate action based interventions in locations when greatest emissions savings can be achieved, such as EV charging in town centres, prioritising reuse of existing built fabric where services and infrastructure are in place, reuse existing paving/building material where possible and in line with relevant specifications.	Prioritise climate action based interventions in locations when greatest emissions savings can be achieved, such as EV charging in town centres, prioritising reuse of existing built fabric where services and infrastructure are in place, reuse existing paving/building material where possible and in line with relevant specifications; having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality.
DZ 5	Prioritise nature based solutions in the execution of all development within the decarbonisation zone aligned with the National Implementation Strategy for Nature-Based Solutions for the management of rainwater and surface water run-off in urban areas.	Prioritise nature based solutions in the execution of all development within the decarbonisation zone aligned with the National Implementation Strategy for Nature-Based Solutions for the management of rainwater and surface water run-off in urban areas, having due regard to environmental sensitivities such as biodiversity, European sites and water quality.
DZ 6	Implement the provisions of the Tree Management Strategy in all RCC functional areas within the DZ to promote canopy health and expansion and enhance ecosystem services and biodiversity.	Implement the provisions of the Tree Management Strategy, with a focus on native trees, in all RCC functional areas within the DZ to promote canopy health and expansion and enhance ecosystem services and biodiversity.
DZ 7	Target existing and proposed and/or new RCC residential developments to optimise energy efficiencies and carbon emissions reductions, including roll-out of energy management systems and smart meters to council owned social housing. Develop targeted education programmes for new technology users in effective energy management as part of pre-tenancy training in housing	<p>Target existing and proposed and/or new RCC residential developments to optimise energy efficiencies and carbon emissions reductions, including roll-out of energy management systems and smart meters to council owned social housing.</p> <p>Develop targeted education programmes for new technology users in effective energy management as part of pre-tenancy training in housing - having due regard to environmental sensitivities such as European Sites and biodiversity related sensitivities, sensitive human receptors and the need appropriately protected and conserve heritage features.</p>
DZ 8	Explore renewable energy heat sources including the installation of heat pumps at existing residential units as well as new developments and the potential of renewable gas and district heating	<ul style="list-style-type: none"> Explore renewable energy heat sources including the installation of heat pumps at existing residential units as well as new developments and the potential of renewable gas and district heating - having due regard to environmental sensitivities such as European Sites and biodiversity related sensitivities, sensitive human receptors and the need appropriately protected and conserve heritage features.
DZ 9	In addition to statutory requirements, engage with SEAI on a potential retrofitting programme to promote upgrade of existing commercial premises to optimise the energy efficiency of current building stock,	In addition to statutory requirements, engage with SEAI on a potential retrofitting programme to promote upgrade of existing commercial premises to optimise the energy efficiency of current building stock, create opportunities for use of renewable energy, including the use of heat pumps



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	create opportunities for use of renewable energy, including the use of heat pumps and renewable alternatives for commercial buildings	and renewable alternatives for commercial buildings - having due regard to environmental sensitivities such as European Sites and biodiversity related sensitivities, sensitive human receptors and the need appropriately protected and conserve heritage features.
DZ 10	RCC will utilise the 'Gap to Target' tool and the Building Pathfinder Programme to support Public Sector building retrofits and potential for renewable energy heat sources should be explored including the use of renewable gas as well as district heating opportunities to reduce energy consumption and carbon emissions at public buildings.	RCC will utilise the 'Gap to Target' tool and the Building Pathfinder Programme to support Public Sector building retrofits and potential for renewable energy heat sources should be explored including the use of renewable gas as well as district heating opportunities to reduce energy consumption and carbon emissions at public buildings - having due regard to environmental sensitivities such as European Sites and biodiversity related sensitivities, sensitive human receptors and the need appropriately protected and conserve heritage features.
DZ 11	Engage with owners/occupiers to enhance awareness to develop appropriate knowledge and skills required to enable energy efficiency improvements in heritage buildings, including specialists to help understand, specify and install appropriate retrofitting to reduce carbon footprint while retaining architectural and heritage integrity. Roll out tailored education scheme in this regard and engage with national funding streams for implementation.	Engage with owners/occupiers to enhance awareness to develop appropriate knowledge and skills required to enable energy efficiency improvements in heritage buildings, including specialists to help understand, specify and install appropriate retrofitting to reduce carbon footprint while retaining architectural and heritage integrity. Roll out tailored education scheme in this regard and engage with national funding streams for implementation, whilst promoting consideration of environmental protection requirements during such works.
DZ 12	Engage with the planning, roads, Town Regeneration, Economic Development & Tourism and Capital Implementation Teams of RCC in the development, design and funding of town centre projects to reduce the need to travel in the urban area and to promote availability and uptake of public transport in support of a pedestrian-focused town centre. Implement the design manual for Urban Roads and Streets in support of pedestrian priority zones and reduction of vehicular dominance in the town centre and residential areas.	Engage with the planning, roads, Town Regeneration, Economic Development & Tourism and Capital Implementation Teams of RCC in the development, design and funding of town centre projects to reduce the need to travel in the urban area and to promote availability and uptake of public transport in support of a pedestrian-focused town centre. Implement the design manual for Urban Roads and Streets in support of pedestrian priority zones and reduction of vehicular dominance in the town centre and residential areas. Promote the carrying out of development supported by this action in a manner that has due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites and local air quality.
DZ 14	RCC will examine investment in electric vehicles (EVs), the potential for increased charging facilities and optimum location for these in association with local businesses and communities	RCC will examine investment in electric vehicles (EVs), the potential for increased charging facilities and optimum location for these in association with local businesses and communities, having due regard to environmental sensitivities such as heritage, biodiversity, European sites, sensitive human receptors, and available grid capacity.



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

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.
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 local authority development underpinned or supported by plan actions is planned and implemented in a manner that appropriately considers the potential for environmental co-benefits, potential environmental impacts and environmental protection requirements. No local authority climate action related development project that is likely to have significant negative effects on the receiving environment shall be supported.
Promote - through control or influence as appropriate - the carrying out of flood resilience measures underpinned by plan actions in a manner that supports climate action-biodiversity related co-benefits, and which has due regard for the protection and enhancement of rare, protected or important habitats and species.
Promote the carrying out of climate action related projects supported by the plan in a manner that supports climate action-cultural heritage co-benefits, and which has due regard to cultural, archaeological or architectural features and sensitivities.
Promote the carrying out of climate action related projects underpinned by the plan in a manner that supports climate action water quality co-benefits, and the achievement of Water Framework Directive objectives.
Promote climate action projects that support protected trees, hedgerows and other habitats such as wetlands, floodzones which contribute to green infrastructure.
Support opportunities to improve and restore ecological connectivity of non-designated habitats and sites (including watercourse connectivity) to improve overall ecosystem resilience and functioning while supporting climate action within the county. 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.
Ensure local authority projects supported by plan actions have taken the necessary precautions to identify and manage invasives species, particularly with regard to Schedule III species. No local authority climate action related development project that is likely to cause the spread of invasives species listed in Schedule III shall be supported.
Support opportunities to promote peatland restoration, rehabilitation and maintenance while achieving climate targets through the implementation of the climate actions within the plan.



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.

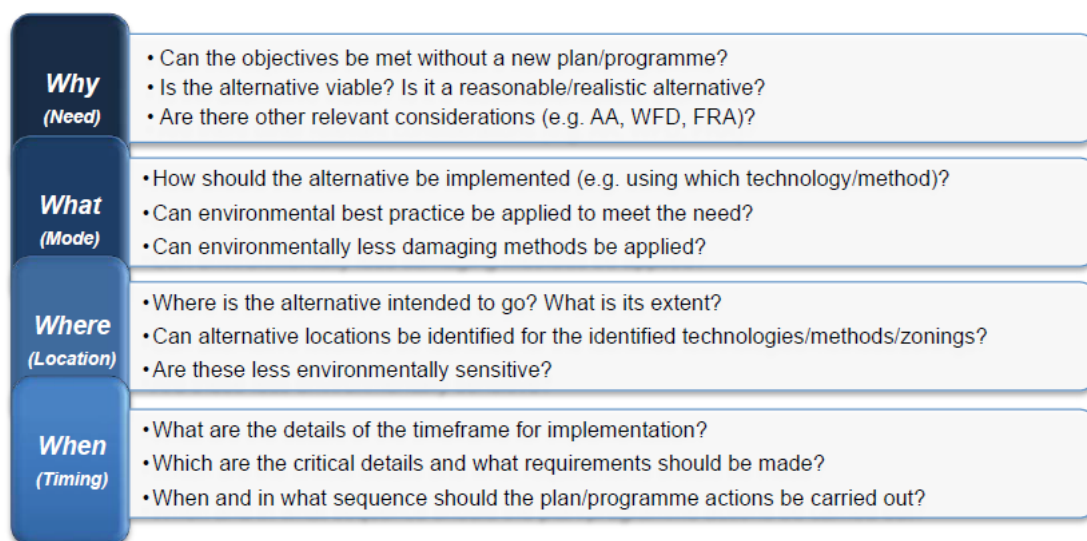


Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3 Developing and Assessing Alternatives in the Strategic Environmental Assessment Process (EPA, 2015).

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
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.	<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 alternatives will promote the creation of a range of climate action co-benefits, including potentially co-benefits for biodiversity and European sites.</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.	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>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>These alternatives 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 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 Roscommon 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 Roscommon 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 projects². 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.

² Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be a) no alternative solution available, b) imperative reasons of overriding public interest for the plan to proceed; and c) Adequate compensatory measures in place.



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