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LOCAL AUTHORITY CLIMATE ACTION PLAN

Appropriate Assessment Conclusion Statement

Prepared for:

Wicklow County Council



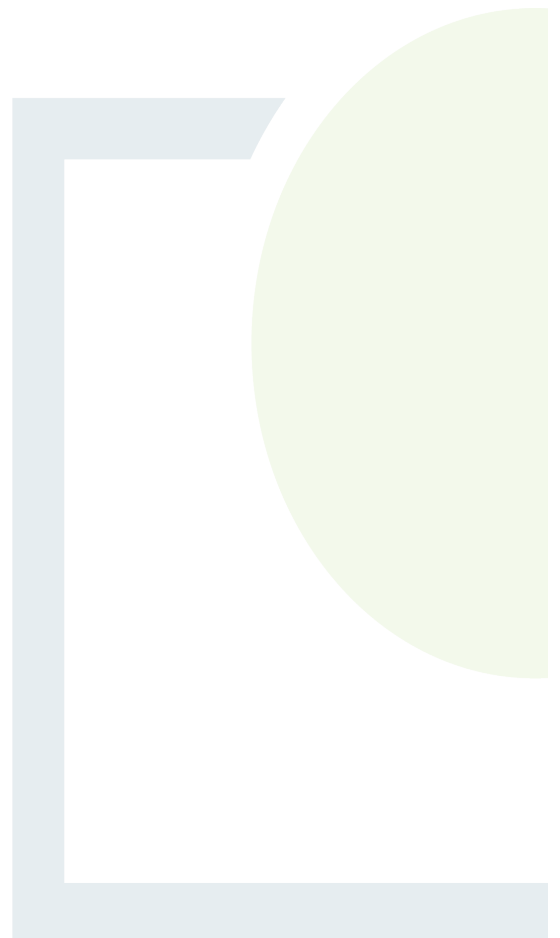
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APPROPRIATE ASSESSMENT CONCLUSION STATEMENT

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

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1. INTRODUCTION

1.1 Background

This is the Appropriate Assessment (AA) Conclusion Statement for the Wicklow 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:
1 BET	<p>Prioritise decarbonising of Significant Energy Usage buildings within the Local Authority</p> <ul style="list-style-type: none"> • Four leisure centres • County Buildings • Bray Fire Station 	<p>Prioritise decarbonisation of Significant Energy Usage buildings within the Local Authority whilst advocating and exerting influence to ensure due regard is had to environmental sensitivities such as protected species associated with such buildings, European sites and biodiversity</p> <ul style="list-style-type: none"> • Four leisure centres • County Buildings • Bray Fire Station
4 BET	<p>Phase out installation of heating systems that use Fossil Fuels in any new dwellings or buildings or major renovation retrofit projects by 2025.</p>	<p>Phase out installation of heating systems that use Fossil Fuels in any new dwellings or buildings or major renovation retrofit projects by 2025, having due regard to environmental sensitivities such as local human receptors, protected species associated with such buildings, European sites and biodiversity; and the need to appropriately protect and conserve protected structures, during any retrofitting works.</p>
5 BET	<p>Implement the Retrofitting Housing Programme for Wicklow housing stock achieving a BER of B2 or in compliance with TCG Part L updates utilising renewable technologies to a minimum of 700 housing units refurbished.</p>	<p>Implement the Retrofitting Housing Programme for Wicklow housing stock achieving a BER of B2 or in compliance with TCG Part L updates utilising renewable technologies to a minimum of 700 housing units refurbished, having due regard to environmental sensitivities such as protected species associated with such buildings, European sites and biodiversity.</p>
7 BET	<p>Develop a pilot to promote adaptive reuse of historic structures - using exemplar retrofitting projects.</p>	<p>Develop a pilot to promote adaptive reuse of historic structures - using exemplar retrofitting projects, having appropriate regard to the need to protect species that may be present in such buildings.</p>
8 BET	<p>Complete the Public Lighting Energy Efficiency Programme following guidance in the Public Lighting Retrofitting Guidance Document and reviewing the existing public lighting levels including the use of lower Colour Temperature in National Park areas and areas with recorded bat populations.</p>	<p>Complete the Public Lighting Energy Efficiency Programme following guidance in the Public Lighting Retrofitting Guidance Document and reviewing the existing public lighting levels including the use of lower Colour Temperature in National Park areas and areas with recorded bat populations, having due regard for the impact the spectrum of light used will have on protected nocturnal species such as bats.</p>
9 BET	<p>Develop and implement an EV charging strategy that ensures geographic spread and access in areas without opportunity for homeowners to charge on their own properties. Revise and update EV Strategy in 3 years.</p>	<p>Develop and implement an EV charging strategy that ensures geographic spread and access in areas without opportunity for homeowners to charge on their own properties, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, and local air quality. Revise and update EV Strategy in 3 years.</p>
10 BET	<p>Install EV Charge points within Local Authority Housing developments i.e. Part L and Development Plan compliance as a minimum.</p>	<p>Install EV Charge points within Local Authority Housing developments i.e. Part L and Development Plan compliance as a minimum, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, and local air quality.</p>



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
11 BET	Deliver the development of a high quality cycling and pedestrian network through Active Travel measures in urban areas and connecting communities.	Deliver the development of a high quality cycling and pedestrian network through Active Travel measures in urban areas and connecting communities. Ensure supported active travel development is carried out in a manner that has due regard to environmental sensitivities such as biodiversity, European sites, water quality and hydrology.
12 BET	Increase the number of schools involved in Safer Routes to Schools.	Increase the number of schools involved in Safer Routes to Schools. Ensure supported active travel development is carried out in a manner that has due regard to environmental sensitivities such as biodiversity, European sites, water quality and hydrology.
13 BET	Strengthen towns and villages through enhancement of green infrastructure measures and sustainable transport linkages.	Strengthen towns and villages through enhancement of green infrastructure measures and sustainable transport linkages, having due regards for environmental sensitivities such as biodiversity, European sites, water quality and hydrology.
16 BET	Facilitate the planning and delivery of the Dart Plus Scheme.	Facilitate the planning and delivery of the Dart Plus Scheme. Ensure supported development is carried out in a manner that has due regard to environmental sensitivities such as Biodiversity, European sites, water quality and hydrology.
18 BET	Implement measures to increase modal shift from private cars by visitors to the county using Public transport, Looped tourism bus services, E-mobility infrastructure, Regulation of parking, Glendalough masterplan.	Implement measures to increase modal shift from private cars by visitors to the county using Public transport, Looped tourism bus services, E-mobility infrastructure, Regulation of parking, Glendalough masterplan. Ensure supported development is carried out in a manner that has due regard to environmental sensitivities such as Biodiversity, European sites, water quality and hydrology.
19 BET	Complete a inventory of the existing Fleet and develop a Fleet management policy to achieve a target of 51% reduction in emissions, which includes the procurement of the fleet and an objective decarbonising the existing fleet.	Complete a inventory of the existing Fleet and develop a Fleet management policy to achieve a target of 51% reduction in emissions, which includes the procurement of the fleet and an objective decarbonising the existing fleet. 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.
21 BET	Procure only zero emission vehicles, unless the vehicle is exempt under EC Regs SI381 of 2021.	Procure only zero emission vehicles, unless the vehicle is exempt under EC Regs SI381 of 2021. Advocate and exert influence and control, as appropriate, to ensure any development required to facilitate this action promotes climate action co-benefits and does not contravene relevant environmental protection criteria or cause significant negative environmental effects.
22 BET	Convert the existing Fleet to a low carbon fuel source where feasible such as Hydro-treated Vegetable Oil (HVO).	Convert the existing Fleet to a low carbon fuel source where feasible such as Hydro-treated Vegetable Oil (HVO), whilst ensuring energy/fuel used to power local authority alternative vehicles is sustainably sourced.
24 BET	Standardise the management of drainage systems within the council including: <ul style="list-style-type: none"> the regular maintenance of regional and local roads drainage systems (Annual Programme). 	Standardise the management of drainage systems within the council including: <ul style="list-style-type: none"> the regular maintenance of regional and local roads drainage systems (Annual Programme), having due regard to the need to promote nature based solutions and Sustainable Drainage Systems, and environmental sensitivities, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	<ul style="list-style-type: none"> the recording and mapping of the areas impacted by weather events (Climate Change events) including the implementation of technology such as the Weather Impact REgister (WIRE) App to capture impacts, response and costs (including ecosystem services/natural capital costs). Mapping the location of attenuation tanks and drainage systems an Arc GIS. 	<ul style="list-style-type: none"> the recording and mapping of the areas impacted by weather events (Climate Change events) including the implementation of technology such as the Weather Impact REgister (WIRE) App to capture impacts, response and costs (including ecosystem services/natural capital costs). Mapping the location of attenuation tanks and drainage systems an Arc GIS.
25 BET	Deliver climate adaptation works on the infrastructure through the Climate Change Adaption & Resilience Works and Drainage funding programs.	Deliver climate adaptation works on the infrastructure through the Climate Change Adaption & Resilience Works and Drainage funding programs, having due regard to the need to promote nature based solutions and Sustainable Drainage Systems, and environmental sensitivities, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology.
1 NEGI	Transpose all relevant legislation and regulation on Climate Change and Flood Management into WCC Policies and guidelines. Including the promoting of natural flood measures where possible.	Transpose all relevant legislation and regulation on Climate Change and Flood Management into WCC Policies and guidelines. Including the promoting of natural flood measures where possible - whilst having appropriate regard to environmental protection requirements associated with flood resilience development.
2 NEGI	Implement the OPW Flood Risk Management Guidelines and ensure that all relevant developments consider climate resilience and demonstrate that they integrate Nature Based SUDS and Nature Based solutions to address surface water management.	Implement the OPW Flood Risk Management Guidelines and ensure that all relevant developments consider climate resilience and demonstrate that they integrate Nature Based SUDS and Nature Based solutions to address surface water management. Ensure due regard is given to the need to promote Sustainable Drainage Systems, and environmental sensitivities, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology.
6 NEGI	Deliver the following Flood Relief Schemes: <ul style="list-style-type: none"> Arklow Flood Relief Scheme Avoca Flood Relief Scheme Baltinglass Flood Relief Scheme 	Deliver the following Flood Relief Schemes: <ul style="list-style-type: none"> Arklow Flood Relief Scheme Avoca Flood Relief Scheme Baltinglass Flood Relief Scheme 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 etc.
7 NEGI	Engage with the OPW in order to review and progress a number of various climate adaption schemes including: <ul style="list-style-type: none"> Blessington Flood Relief Scheme 	Engage with the OPW in order to review and progress a number of various climate adaption schemes including: <ul style="list-style-type: none"> Blessington Flood Relief Scheme



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	<ul style="list-style-type: none"> Greystones & Environs Flood Relief Scheme Wicklow & Ashford Flood Relief Scheme Facilitate the hydraulic modelling of the Bray Flood Relief Scheme Facilitate the OPW to conduct a review of the PFRA with regard to flood risk arising from floods on surface water infrastructure such as Culverts. 	<ul style="list-style-type: none"> Greystones & Environs Flood Relief Scheme Wicklow & Ashford Flood Relief Scheme facilitate the hydraulic modelling of the Bray Flood Relief Scheme facilitate the OPW to conduct a review of the PFRA with regard to flood risk arising from floods on surface water infrastructure such as Culverts. <p>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 etc.</p>
8 NEGI	Incorporate Nature Based Measures for coastal erosion in order to support the conservation and management of Sand Dunes at Brittas Bay.	Incorporate Nature Based Measures for coastal erosion in order to support the conservation and management of Sand Dunes at Brittas Bay, having due regard to environmental sensitivities associated with coastal areas such as the receiving marine environment, biodiversity, European sites, recreation and amenity value etc.
9 NEGI	Develop demonstration sites highlighting Nature Based SuDS providing flood attenuation systems within existing Urban Areas.	Develop demonstration sites highlighting Nature Based SuDS providing flood attenuation systems within existing Urban Areas, having due regard to environmental sensitivities such as biodiversity, European sites and water quality.
10 NEGI	Develop and implement an integrated SUDS policy to guide planning, installation, and monitoring to improve storm water management. Provide training on SUDS implementation to key staff. Incorporate guidance for maintenance of SUDS.	Develop and implement an integrated SUDS policy to guide planning, installation, and monitoring to improve storm water management. Provide training on SUDS implementation to key staff. Incorporate guidance for maintenance of SUDS, having due regard to environmental sensitivities such as biodiversity, European sites and water quality.
12 NEGI	<p>Prioritise the use of Nature Based SuDS on local authority schemes within the following areas:</p> <p>1. Roads: Ensure drainage works are considered at the preliminary design stage of project development for all road and infrastructure projects.</p> <p>2. Housing: Integrate NBSuDS techniques from the initial preliminary development design and include within the completion of projects. Additionally utilise water demand technologies into all housing capital projects.</p>	<p>Prioritise the use of Nature Based SuDS on local authority schemes within the following areas:</p> <p>1. Roads: Ensure drainage works are considered at the preliminary design stage of project development for all road and infrastructure projects.</p> <p>2. Housing: Integrate NBSuDS techniques from the initial preliminary development design and include within the completion of projects. Additionally utilise water demand technologies into all housing capital projects.</p> <p>Having due regard to environmental sensitivities such as biodiversity, European sites and water quality.</p>



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
14 NEGI	Create green infrastructure standards for managing greenspace by Municipal District to include: Mowing regimes, Hedgerow management, Tree care, Management of weeds and Managing Riparian zones.	Create green infrastructure standards for managing greenspace by Municipal District to include: Mowing regimes, Hedgerow management, Tree care, Management of weeds and Managing Riparian zones. These standards shall be developed by a competent ecology team, and shall have due regard to the need to appropriately manage these habitats.
16 NEGI	Support and facilitate LAWPRO projects improving water quality within the county catchments. Example scheme: Avonmore Waters of Life Project.	Support and facilitate LAWPRO projects improving water quality within the county catchments. Example scheme: Avonmore Waters of Life Project, having due regard to the maintenance and improvement of water quality in line with the aims of the Water Framework Directive.
18 NEGI	Review and Update the Wicklow Heritage Plan to record, conserve, and raise awareness of all aspects of built, natural and cultural heritage.	Review and Update the Wicklow Heritage Plan to record, conserve, and raise awareness of all aspects of built, natural and cultural heritage, having due regard to the need to appropriately protect, conserve and enhance important habitats and species and European sites, and support the maintenance and improvement of water quality in line with the aims of the Water Framework Directive.
20 NEGI	Review and update the Wicklow Biodiversity Action Plan to protect and enhance local biodiversity, including climate-relevant measures.	Review and update the Wicklow Biodiversity Action Plan to protect and enhance local biodiversity, including climate-relevant measures, having due regard to the need to appropriately protect, conserve and enhance important habitats and species and European sites, and support the maintenance and improvement of water quality in line with the aims of the Water Framework Directive. This plan shall be developed by a competent ecology team, and shall have due regard to the need to appropriately manage these habitats.
22 NEGI	Develop an integrated programme to address Invasive Alien Species through education and with recording and eradication programmes in the public realm.	Develop an integrated programme to address Invasive Alien Species through education and with recording and eradication programmes in the public realm. This programme shall be developed by a competent ecology team, and shall have due regard to the need to appropriately manage and prevent the spread of invasive species.
24 NEGI	Pilot a biodiversity inclusive design for a social housing estate considering the following elements within the design: green roofs, green walls, wetland & pond NBSuDS, green car parking, nest boxes in facades, grasslands, and wildlife friendly shrubs and trees in open space.	Pilot a biodiversity inclusive design for a social housing estate considering the following elements within the design: green roofs, green walls, wetland & pond NBSuDS, green car parking, nest boxes in facades, grasslands, and wildlife friendly shrubs and trees in open space, ensuring development have due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality and cultural heritage.
27 NEGI	Develop a hill and forest fire management response and prevention strategy, including protocols for responding to fires, enforcement, awareness campaigns of the impact of fires and systems to measure the extent and economic costs of fires.	Develop a hill and forest fire management response and prevention strategy, including protocols for responding to fires, enforcement, awareness campaigns of the impact of fires and systems to measure the extent and economic costs of fires, having appropriate regard to the need to support the achievement of conservation objectives and protect and enhance important habitats or the qualifying interests of any protected sites.
29 NEGI	Develop a hedgerow plan for the county with actions to map, protect and develop hedgerows.	Develop a hedgerow plan for the county with actions to map, protect and develop hedgerows, having due regard to hedgerow area conservation requirements and the need to avoid habitat fragmentation.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
32 NEGI	Build climate resilience and improve the energy performance of architectural and archaeological heritage in public and private ownership through schemes such as the BHIS, HSF, HTI, IWTN and Community Monument Fund.	Build climate resilience and improve energy performance of architectural and archaeological heritage in public and private ownership through schemes such as BHIS, HSF, HTI, IWTN and Community Monument Fund, having due regard to environmental sensitivities such as local human receptors, protected species associated with such buildings, European sites and biodiversity, and the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations.
12 CRT	Incorporate Climate Action into all plans under the following: <ul style="list-style-type: none"> • Rural Development Fund • Urban Regeneration and Development Fund • Town and Village Renewal Scheme • CLÁR Scheme 	Incorporate Climate Action into all plans under the following: <ul style="list-style-type: none"> • Rural Development Fund • Urban Regeneration and Development Fund • Town and Village Renewal Scheme • CLÁR Scheme <p>Having due regard to environmental sensitivities such as European Sites and biodiversity related sensitivities, sensitive human receptors and the need appropriately protected and conserve cultural heritage features.</p>
14 CRT	Promote tree planting by providing: <ul style="list-style-type: none"> • an annual tree planting grant for communities and schools • trees to communities during National Tree Week 	Promote native tree planting by providing: <ul style="list-style-type: none"> • an annual native tree planting grant for communities and schools • native trees to communities during National Tree Week
22 CRT	Assess five existing large local authority housing schemes for public transport links and active travel access.	Assess five existing large local authority housing schemes for public transport links and active travel access, whilst having due regard to environmental sensitivities such as European sites, biodiversity and water and air quality.
5 SRM	Promote uptake of energy performance measures in business and agricultural sectors through the promotion of: <ul style="list-style-type: none"> • SEAI programmes and Energy Audits, • Support Scheme for renewable heat, • Micro and small scale renewable generation, • Anaerobic digestion, • Energy efficient and heating control technology 	Promote uptake of energy performance measures in business and agricultural sectors through the promotion of: <ul style="list-style-type: none"> • SEAI programmes and Energy Audits, • Support Scheme for renewable heat, • Micro and small scale renewable generation, • Anaerobic digestion, • Energy efficient and heating control technology <p>- whilst advocating and exerting influence to ensure supported renewable energy development does not contravene relevant environmental protection criteria or cause significant negative environmental effects.</p>



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
7 SRM	Develop a renewables hub at the Wicklow Campus in Clermont to support development of the sector in County Wicklow.	Develop a renewables hub at the Wicklow Campus in Clermont to support development of the sector in County Wicklow, while ensuring that the businesses and projects supported accord with relevant planning and environmental protection criteria.
9 SRM	Identify and implement Rural Development Fund initiatives that deliver on a transition towards a climate neutral rural economy to include: <ul style="list-style-type: none"> • Rural Transport, • Working hubs, • Town and Village regeneration • Nature Based solutions • Digital initiatives • Green Economy • Bio economy 	Identify and implement Rural Development Fund initiatives that deliver on a transition towards a climate neutral rural economy to include: <ul style="list-style-type: none"> • Rural Transport, • Working hubs, • Town and Village regeneration • Nature Based solutions • Digital initiatives • Green Economy • Bio economy <p>- having appropriate regard to planning and environmental protection requirements, environmental sensitivities such as European Sites, biodiversity and opportunities for promoting climate action co-benefits and interconnectivity.</p>
12 SRM	Liaise with Signpost and ACRES Schemes to support climate action in the agricultural sector. Help to promote farms to become demonstration farmers and highlight the work being done in Wicklow to decarbonize agriculture and manage land using best practice for sustainability.	Liaise with Signpost and ACRES Schemes to support climate action in the agricultural sector. Help to promote farms to become demonstration farmers and highlight the work being done in Wicklow to decarbonize agriculture and manage land using best practice for sustainability, development planning and environmental protection and enhancement.
14 SRM	Examine the potential of the former landfill sites of Ballymurtagh (Avoca) and Rampere (Baltinglass) for the development of green energy uses.	Examine the potential of the former landfill sites of Ballymurtagh (Avoca) and Rampere (Baltinglass) for the development of green energy uses, having due regard to planning and environmental protection considerations.
20 SRM	Upgrading of Council Owned Buildings to include for Nature Based SuDS and Water Demand.	Upgrading of Council Owned Buildings to include for Nature Based SuDS and Water Demand. Ensure all SuDS related construction works are designed and implemented in a manner that does not result in the occurrence of significant adverse environmental effects.
3 ADZ BE&T	Complete a Local Transport Plan taking the following into account <ul style="list-style-type: none"> • the 10 minute town concept 	Complete a Local Transport Plan taking the following into account <ul style="list-style-type: none"> • The 10 minute town concept • Active Travel



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	<ul style="list-style-type: none"> Active Travel Permeability Public Transport Requirements Shared Services Mobility Hub Active travel bridges 	<ul style="list-style-type: none"> Permeability Public Transport Requirements Shared Services Mobility Hub Active travel bridges <p>Ensure any required development is planned in a manner that has due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites and cultural heritage.</p>
5 ADZ BE&T	Implement the Retrofitting Housing Programme for existing housing stock achieving a BER of B2 or in compliance with TCG Part L. Create awareness of works undertaken and their benefits to encourage retrofitting in private housing stock.	Implement the Retrofitting Housing Programme for existing housing stock achieving a BER of B2 or in compliance with TCG Part L, 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 in accordance with relevant protected structures regulations. Create awareness of works undertaken and their benefits to encourage retrofitting in private housing stock.
6 ADZ BE&T	Provide newly constructed housing units to an A2 BER rating or in compliance with TCG Part L within the lifetime of the Climate Action Plan.	Provide newly constructed housing units to an A2 BER rating or in compliance with TCG Part L within the lifetime of the Climate Action Plan, having due regard to environmental sensitivities such as visual amenity and quality, local human receptors, Biodiversity, European sites, water quality and hydrology, and amenity value.
7 ADZ BE&T	Undertake a retrofit of the Coral Leisure Centre pool and sports hall.	Undertake a retrofit of the Coral Leisure Centre pool and sports hall, 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.
8 ADZ BE&T	Undertake a retrofit of the Civic Amenity Site and install solar pv panels under the small scale generation scheme.	Undertake a retrofit of the Civic Amenity Site and install solar pv panels under the small scale generation scheme, 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.
9 ADZ BE&T	Investigate district heating opportunities from the planned Data Centre.	Investigate district heating opportunities from the planned Data Centre, ensuring appropriate regard to planning and environmental protection considerations.
10 ADZ BE&T	Within the Arklow Municipal District increase the number of EV's and convert the existing fleet to a low carbon fuel source.	Within the Arklow Municipal District increase the number of EV's and convert the existing fleet to a low carbon fuel source, 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 and ensuring any ancillary development have due regard to environmental sensitivities such as local human



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
		receptors, European sites and biodiversity, and the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations.
12 ADZ BE&T	Develop a pilot to promote adaptive reuse of historic structures.	Develop a pilot to promote adaptive reuse of historic structures, 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 that may be present in such buildings and European sites.
13 ADZ BE&T	Increase the number of schools involved in Safer Routes to Schools.	Increase the number of schools involved in Safer Routes to Schools, ensuring any ancillary development have due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites and local air quality.
16 ADZ NE&GI	Map and identify green infrastructure opportunities in the town to support the development of NBSuDS improving climate resilience.	Map and identify green infrastructure opportunities in the town to support the development of NBSuDS improving climate resilience, while ensuring projects have due regard to environmental sensitivities, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology.
17 ADZ NE&GI	Promote rainwater harvesting, green roofs, green walls and water demand reducing projects.	Promote rainwater harvesting, green roofs, green walls and water demand reducing projects, while ensuring projects have appropriate regard to local environmental sensitivities such as the receiving water environment, biodiversity European sites and cultural heritage considerations.
21 ADZ CR&T	Promote greater uptake of solar PV in the town through promoting the micro generation and the small scale generation scheme.	Promote greater uptake of solar PV in the town through promoting the micro generation and the small scale generation scheme, 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.
24 ADZ S&RM	Investigate opportunity to develop anaerobic digestion in Arklow, identifying potential feed stock.	Investigate opportunity to develop anaerobic digestion in Arklow, identifying potential feed stock, whilst advocating and exerting influence to ensure anaerobic digestion related development and activities promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.



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

<p>Promote climate action projects that support and maximise environmental co-benefits, such as biodiversity protection and enhancement; improved air, water or soil quality; or enhanced recreation, amenity and cultural heritage value, to ensure win-win benefits are gained.</p>
<p>Support or facilitate climate action related projects and initiatives which seek to make improvements in soil structure, management and health by increasing soil organic carbon - which will create the environmental co-benefits of improving flood resilience by enhancing water holding capacity of soils and increasing the level of GHG sequestration associated with land use functions.</p>
<p>Ensure all development underpinned or supported by climate action is planned and implemented in a manner that appropriately considers the potential for environmental co-benefits, potential environmental impacts and environmental protection requirements. No climate action related development project that is likely to have a significant negative effect on the receiving environment shall be supported.</p>
<p>Flood defence projects or related maintenance works supported by plan actions shall be carried out in a manner that promotes climate action-biodiversity related co-benefits, and shall have due regard for the protection and enhancement of rare, protected or important habitats and species.</p>
<p>Ensure climate action related projects are carried out in a manner that promotes climate action-cultural heritage co-benefits, and do not result in unauthorised physical damage to cultural, archaeological or architectural features, or unauthorised or inappropriate alteration of the context of sensitive cultural heritage features.</p>
<p>Ensure climate action related projects are carried out in a manner that promotes climate action water quality co-benefits, and align with the provisions of the Water Framework Directive and relevant River Basin Management Plan.</p>
<p>Promote climate action projects that support protected trees, hedgerows and other habitats such as wetlands, floodzones which contribute to green infrastructure.</p>
<p>Support opportunities to improve ecological connectivity of non-designated habitats and sites to improve overall ecosystem resilience and functioning while supporting climate action within the county.</p>
<p>Ensure all projects supported by the council have taken the necessary precautions to identify and manage invasives species, particularly with regard to Schedule III species. No climate action related development project that is likely to cause the spread of invasives species listed in Schedule III shall be supported.</p>
<p>Support opportunities to support peatland restoration, rehabilitation and maintenance while achieving climate targets through the implementation of the climate actions within the plan.</p>



3. CONSIDERATION OF ALTERNATIVES

3.1 Introduction

This section provides an overview of reasonable Plan alternatives considered during the plan-making processes. The environmental effects of reasonable alternative, including effects on biodiversity and European sites, were considered when choosing the preferred Plan.

3.2 Approach to Developing Reasonable Alternatives

A range of alternatives to the LACAP were considered during the plan-making process. The approach for identifying reasonable alternatives to the LACAP is defined below:

1. Iterative communication was held between the plan-making and environmental assessment teams to identify the various alternative approaches and options being considered to achieve the vision of the plan - the reduction of GHG emissions at Local Authority organizational level and within the Community in support of Climate Action policy. This communication commenced early on during the plan-making process.
2. Reasonable alternatives considered were identified. For an alternative to be considered reasonable, it must be practical/functional, realistic and implementable. An evaluation of whether each alternative was practical/functional, reasonable and implementable took place. This evaluation considered the following factors:
 3. The vision of high-level objectives of the LACAP.
 4. The geographic scope of the LACAP.
 5. The actual powers and functions of the Local Authority.
 6. The climate action merits of the alternative.
 7. The genuine ability of the alternative to achieve the plan vision and high-level objectives.
 8. The technical feasibility of the alternative.
 9. The availability of resources, including financial resources to deliver the plan within the required timeframe.
 10. The policy hierarchy and the parameters placed around the LACAP by higher-level policy.
 11. The legislative context and the parameters placed around the DLACAP by climate action and environmental related legislation.

The toolkit contained in the EPA's guidelines entitled 'Developing and Assessing Alternatives in Strategic Environmental Assessment Good Practice Guidance' (2015) was utilized when identifying reasonable alternatives. The 'Why? What? Where? When?' Model defined in the guidelines were used when framing reasonable alternatives, as shown in Figure 3-1.

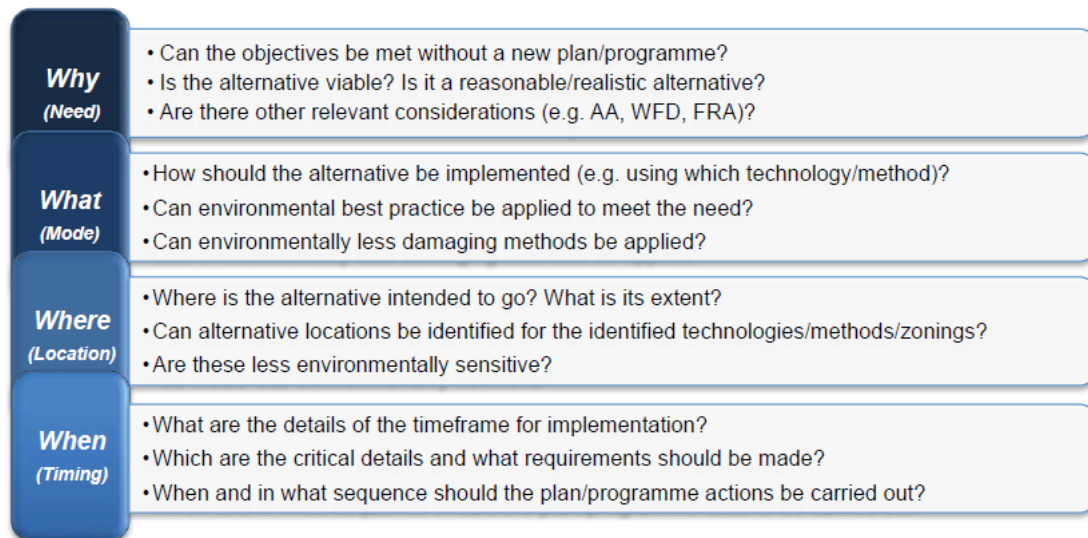


Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3 Developing and Assessing Alternatives in the Strategic Environmental Assessment Process (EPA, 2015).

3.3 Identification and Description of Reasonable Alternatives

Reasonable alternatives to the LACAP were identified. A description of these reasonable alternatives and the reasons for selecting these reasonable alternatives are presented in Table 3-1.

A 'Do Nothing' or 'Do Minimum' alternative was not a reasonable alternative in this instance as the preparation of an effective LACAP is a statutory requirement under Section 16 of the Climate Act.



Table 3-1: Reasonable Alternatives to the LACAP

Reasonable Alternative	Description of Reasonable Alternative	Reasoning for selecting this Reasonable Alternative
<p>Alternative 1 - The Pareto Approach: Prioritize reducing GHG emissions from largest GHG emitting sectors to mitigate against climate change impacts.</p>	<p>This alternative involved developing a LACAP that primarily focusses on climate mitigation and reducing GHG emissions associated with the largest GHG emitting sectors in the County that a local authority can reasonable influence having regard to the functions of a local authority - the Residential and Transport sectors.</p>	<p>This was a viable alternative that could achieve a significant reduction in GHG emissions by prioritizing and supporting climate mitigation related action for the Residential and Transport sectors. The alternative would cover the period from 2024 to 2029 (the duration of the prospective LACAP).</p>
<p>Alternative 2 - The Holistic Approach: Adopt a multi-pronged approach and focus on a range of priority areas to mitigate against and adapt to climate change impacts.</p>	<p>This alternative involved developing a LACAP that has a balanced focus on both climate mitigation and adaptation across several theme areas and all socio-economic sectors.</p>	<p>This was a viable alternative that would have enhanced potential to reduce GHG emissions across multiple sectors, potential to offset GHG emissions, and greater potential to protect the local community and the environment from climate change related risks. Climate mitigation and adaptation actions across a wide breath of theme areas would be supported by the LACAP. The alternative would cover the period from 2024 to 2029 (the duration of the prospective LACAP).</p> <p>This alternatives 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 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 lead to some positive environmental effects and would result 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 Wicklow Local Area 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 Wicklow Local Area 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.

All potential effects that may be transmitted to European sites in Northern Ireland will also be appropriately mitigated with the adoption of the defined mitigation. Mitigation measures have been adopted to ensure that the environmental effects of Plan Action are controlled at the source. Thus, it can be concluded that the LACAP is not foreseen to have any significant adverse effects on designated European sites situated in Northern Ireland, alone or in combination with other plans or projects.



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