



CONSULTANTS IN ENGINEERING,
ENVIRONMENTAL SCIENCE &
PLANNING

LOCAL AUTHORITY CLIMATE ACTION PLAN

Appropriate Assessment Conclusion Statement

Prepared for:

Waterford City and County Council



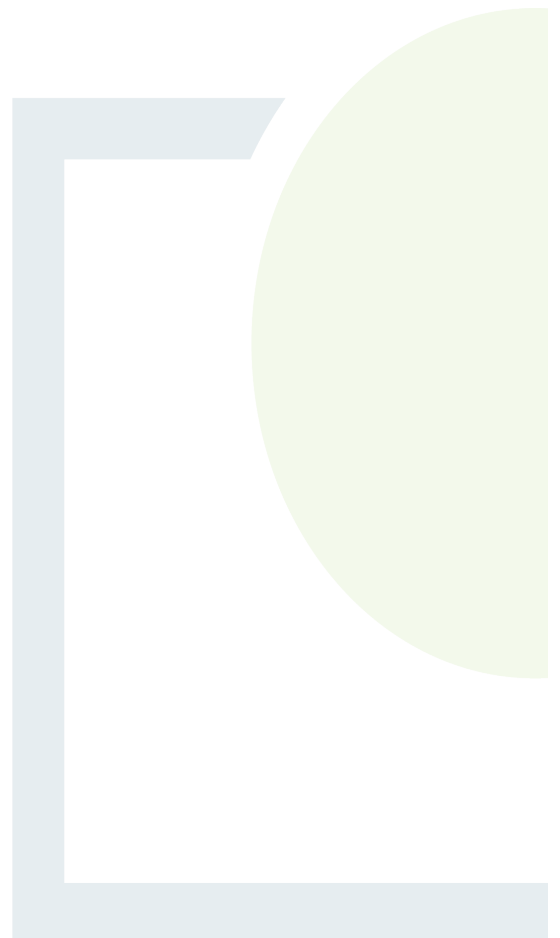
Date: February 2024

Core House, Pouladuff Road, Cork, T12 D773, Ireland

T: +353 21 496 4133 | E: info@ftco.ie

CORK | DUBLIN | CARLOW

www.fehilytimoney.ie



APPROPRIATE ASSESSMENT CONCLUSION STATEMENT

REVISION CONTROL TABLE, CLIENT, KEYWORDS AND ABSTRACT

User is responsible for Checking the Revision Status of This Document

Rev. No.	Description of Changes	Prepared by:	Checked by:	Approved by:	Date:
1	Final	RD/AMW/EW/MG	RD	AT	14/02/2024

Client: Waterford City and County Council

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

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

TABLE OF CONTENTS

1.	INTRODUCTION	1
1.1	Background.....	1
1.2	Requirements in relation to AA Conclusion Statements.....	1
2.	HOW THE FINDINGS OF THE AA WERE INTEGRATED INTO THE LACAP	2
2.1	Integrated Biodiversity Assessment Approach	2
2.2	Mitigation through integration of environmental considerations into the LACAP.....	2
3.	CONSIDERATION OF ALTERNATIVES	13
3.1	Introduction.....	13
3.2	Approach to Developing Reasonable Alternatives.....	13
3.3	Identification and Description of Reasonable Alternatives.....	14
3.4	Evaluation of Reasonable Alternatives and Reasons for Choosing the Preferred Plan	16
4.	AA CONCLUSION.....	17

LIST OF FIGURES

	<u>Page</u>
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).....	14

LIST OF TABLES

Table 2-1: Proposed Environmental Mitigation Measures - Additional text included in Plan actions relating to environmental protection related obligations and environmental enhancement opportunities	3
Table 2-2: Proposed Environmental Mitigation Measures - Environmental Governance Principles included in the plan	12
Table 3-1: Reasonable Alternatives to the LACAP	15



1. INTRODUCTION

1.1 Background

This is the Appropriate Assessment (AA) Conclusion Statement for the Waterford 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:
1.23	County Council investment in partnership for renewable energy projects where a suitable project is identified	County Council investment in partnership for renewable energy projects where a suitable project is identified, Promote - through control or influence as appropriate - the carrying out of such projects in a manner that has due regard to environmental sensitivities such as biodiversity, European sites, landscape and visual amenity and sensitive human receptors.
1.24	Apply for Pathfinder funding and deliver energy projects and continue to apply for Better Energy Community funding	Apply for Pathfinder funding and deliver energy projects; having due regard to environmental sensitivities such as biodiversity, European Sites and sensitive human receptors. Continue to apply for Better Energy Community funding.
1.26	Develop a financial instrument to speed up the retrofit of social housing	Develop a financial instrument to speed up the retrofit of social housing, ensuring that retrofitting is carried out with due regard to environmental sensitivities such as protected species associated with such buildings, air quality, European sites and biodiversity.
2.2	Replace fossil fuels with renewable fuel in WCCC Fleet	Replace fossil fuels with renewable fuel in WCCC Fleet whilst ensuring energy/fuel used to power local authority alternative vehicles is sustainably sourced.
2.3	Replace fossil fuel vehicles with EVs in WCCC fleet	Replace fossil fuel vehicles with Electric Vehicles (EV) in WCCC fleet whilst ensuring appropriate end-of-life management practices are in place for Electric Vehicles under the ownership of local authorities.
2.4	Deliver the County EV charging strategy and use the findings to apply for funding for the residential neighbourhood EV charging scheme in the areas that have been identified as needing charge points	Deliver the County EV charging strategy and use the findings to apply for funding for the residential neighbourhood EV charging scheme in the areas that have been identified as needing charge points. Ensure development supported by the strategy is delivered in a manner that has due regard to environmental sensitivities (European sites, biodiversity, built heritage) and available grid capacity.
2.6	Deliver E-Mobility Hubs (Electric car, scooter and bike depot) where the public can rent vehicles and facilitate e-car clubs	Deliver E-Mobility Hubs (Electric car, scooter and bike depot) where the public can rent vehicles and facilitate e-car clubs, having due regard to environmental sensitivities such as biodiversity, European sites, air quality, and water quality.
2.9	Collaborate with Active Travel & Area Engineer to identify and work with schools to run a programme for safe routes to school (School Streets). Aim for one school per year in the County.	Collaborate with Active Travel & Area Engineer to identify and work with schools to run a programme for safe routes to school (School Streets); having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality, cultural heritage. Aim for one school per year in the County.
2.16	Review roundabouts for improvements: Dutch style	Review roundabouts for improvements: Dutch style. Ensure any consequential development has due regard to environmental sensitivities such as European sites, air quality, water quality, and biodiversity.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
2.18	Integration of Sustainable Urban Drainage Systems and other nature-based solutions into plans	Integration of Sustainable Urban Drainage Systems and other nature-based solutions into plans. 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.
2.19	Engage with Active Travel goals -secure cycle parking in main car parks, cycle lanes designed for daily commuter use (segregated if possible, curbing not plastic wands, design process to include consultation with cycling community)	Engage with Active Travel goals -secure cycle parking in main car parks, cycle lanes designed for daily commuter use (segregated if possible, curbing not plastic wands, design process to include consultation with cycling community). Ensure any ancillary developments has due regard to environmental sensitivities such as European sites, air quality, water quality, and biodiversity.
2.27	Survey of roads/bridges/ infrastructures vulnerable to extreme weather events, produce vulnerability report and reinforce those structures	Survey of roads/bridges/infrastructures vulnerable to extreme weather events, produce vulnerability report and reinforce those 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 or European sites.
2.33	Prepare and apply a protocol to enable and require a pre-set standard for 'Climate Proofing' including water sensitive urban design, Rainwater Management Plans, and Life Cycle Assessment of all local authority led plans, purchases and investment	Prepare and apply a protocol to enable and require a pre-set standard for 'Climate Proofing' including water sensitive urban design, Rainwater Management Plans, and Life Cycle Assessment of all local authority led plans, purchases and investment, ensuring the protocol has appropriate regard to environmental protection requirements and opportunities for promoting climate action co-benefits.
2.38	Support new privately owned regeneration through facilitating a cooperative community with a collective skillset to tackle renovation projects from within its own resources, building upon work conducted under the URDF	Support new privately owned regeneration through facilitating a cooperative community with a collective skillset to tackle renovation projects from within its own resources, building upon work conducted under the URDF. Promote with partners the carrying out of such projects in a manner that has due regard to environmental sensitivities, including biodiversity, European sites and built heritage.
2.44	Additional km of upgraded footpaths by 2029 - 23.16 in the County, 3km in the City	Additional km of upgraded footpaths by 2029 - 23.16 in the County, 3km in the City, having due regard to environmental sensitivities such as the receiving water environment, and local air quality.
2.45	Additional km of new cycle lanes - 10.62km in the County, 33.92km in the city	Additional km of new cycle lanes - 10.62km in the County, 33.92km in the city, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality.
2.48	Cycle parking target - cycle parking for 5,000 bikes across the County	Cycle parking target - cycle parking for 5,000 bikes across the County, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality.
2.49	Investigate renewable back-up power generation for servers vulnerable to power outages (Dungarvan)	Investigate renewable back-up power generation for servers vulnerable to power outages (Dungarvan), having due regard to environmental sensitivities such as biodiversity, European sites, air quality and water quality.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
2.53	Develop a County Heritage Plan and Biodiversity Plan with climate action as a cross-cutting theme/goal (Climate Proofed)	Develop a County Heritage Plan and Biodiversity Plan with climate action as a cross-cutting theme/goal (Climate Proofed), having due regard to the need to appropriately protect, conserve and enhance important habitats and species and European sites and protect built heritage.
2.55	Regionally develop projects to promote adaptive reuse of historic structures using exemplar retrofitting projects, life cycle assessment and carbon budgets to demonstrate climate value	Regionally develop projects to promote adaptive reuse of historic structures using exemplar retrofitting projects, life cycle assessment and carbon budgets to demonstrate climate value, having due regard to the need to not negatively impinge on any protected species that may be present in such buildings and European sites, and the need to appropriately conserve protected structures.
2.59	Targeting of social homes still using solid fuels, or older social homes, as priority of retrofitting program	Targeting of social homes still using solid fuels, or older social homes, as priority of retrofitting program. Deliver retrofitting projects in a manner that has due regard to environmental sensitivities such as protected species, biodiversity and sensitive human receptors.
2.60	Continue moving to central heating systems only	Continue moving to central heating systems only. Deliver retrofitting projects in a manner that has due regard to environmental sensitivities such as protected species, biodiversity and sensitive human receptors.
2.61	Continue delivering the Croi Conaithe programme, bringing vacant homes back to use	Continue delivering the Croi Conaithe programme, bringing vacant homes back to use. Promote - through control or influence as appropriate - the carrying out of regeneration works in manner that has due regard to environmental sensitivities such as protected species, biodiversity, air quality and water quality.
2.64	Avoid fossil fuel heating systems and continue to replace coal and oil heating systems	Avoid fossil fuel heating systems and continue to replace coal and oil heating systems. Deliver retrofitting projects in a manner that has due regard to environmental sensitivities such as protected species, biodiversity and sensitive human receptors.
2.67	Upgrade at least 25% of social houses (E/F/G BER to BER B2 or higher). This figure is based on the current funding allocation, and may increase.	Upgrade at least 25% of social houses (E/F/G BER to BER B2 or higher), having due regard to environmental sensitivities such as protected species, biodiversity, air quality and water quality. This figure is based on the current funding allocation, and may increase.
2.69	50% improvement in energy efficiency across all Council operations	50% improvement in energy efficiency across all Council operations, whilst having due regard to environmental sensitivities such as visual amenity, water and air quality, and biodiversity related sensitivities.
2.70	Phase out fossil-fuel based boilers from Council buildings by 2025.	Phase out fossil-fuel based boilers from Council buildings by 2025, whilst having due regard to environmental sensitivities such as visual amenity, sensitive human receptors and biodiversity related sensitivities.
2.71	Replace streetlighting with LED energy efficient equivalents and enable lighting controls to save energy	Replace streetlighting with LED energy efficient equivalents and enable lighting controls to save energy, while ensuring the lumen levels and spectral range are maintained or reduced/controlled to avoid effects on biodiversity.
2.72	Addition of renewable energy to Council buildings that have a floor area of greater than 250m ² and do not have conservation restrictions	Addition of renewable energy to Council buildings that have a floor area of greater than 250m ² and do not have conservation restrictions, whilst having due regard to environmental sensitivities such as visual amenity and biodiversity related sensitivities.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
2.74	Assess Council land for Renewable Energy suitability. A target for example of 5MWh of installed capacity across the County developed in conjunction with a community (s) would require a solar farm of a 10ha size could be achieved.	Assess Council land for Renewable Energy suitability. A target for example of 5MWh of installed capacity across the County developed in conjunction with a community (s) would require a solar farm of a 10ha size could be achieved. Ensure planning and environmental constraints are considered during this assessment.
3.1	Complete county habitat and ecosystem service surveys with a focus on carbon sinks and stores and identify sites suitable for restoration (wetlands, woodlands, sand dunes, saltmarsh and sea grass beds).	Complete county habitat and ecosystem service surveys with a focus on carbon sinks and stores and identify sites suitable for restoration (wetlands, woodlands, sand dunes, saltmarsh and sea grass beds), 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.
3.2	Develop a County Biodiversity Plan with climate action as a cross-cutting theme/goal. Use the County Biodiversity Plan as a vehicle to highlight a range of biodiversity opportunities that can be taken up at farm level with particular emphasis on the new ECO scheme. Highlight schemes for biodiversity opportunities available to farmers	Develop a County Biodiversity Plan with climate action as a cross-cutting theme/goal. Use the County Biodiversity Plan as a vehicle to highlight a range of biodiversity opportunities that can be taken up at farm level with particular emphasis on the new ECO scheme. Highlight schemes for biodiversity opportunities available to farmers - 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.
3.5	Develop nature-based flooding approaches in collaboration with relevant stakeholders. Assessment made at whole-catchment level (catchment as the management unit). Prioritise delivery of Catchment Flood Risk Assessment and Management (CFRAM)	Develop nature-based flooding approaches in collaboration with relevant stakeholders. Assessment made at whole-catchment level (catchment as the management unit). Prioritise delivery of Catchment Flood Risk Assessment and Management (CFRAM). 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.
3.16	Identify sites and opportunities to work with other agencies and communities on restoration of water levels and 'slow the flow' measures to mitigate flood risk.	Identify sites and opportunities to work with other agencies and communities on restoration of water levels and 'slow the flow' measures to mitigate flood risk. Promote - through control or influence as appropriate - the carrying out of development supported by this action in a manner that has due regard to opportunities 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.
3.17	Deliver on a yearly increase in the application of Blue-Green Infrastructure, Nature Based-Solutions (NBS) and Integrated Rainwater Management in local authority, private and public projects. Collate a database and spatial map to track progress.	Deliver on a yearly increase in the application of Blue-Green Infrastructure, Nature Based-Solutions (NBS) and Integrated Rainwater Management in local authority, private and public projects, having due regard to environmental sensitivities at these locations, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value. Collate a database and spatial map to track progress.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
3.19	Prepare strategic wildfire management plan for high-risk areas	Prepare strategic wildfire management plan for high-risk areas. Ecological expertise shall be sought during plan preparation. The plan and shall have due regard to the need to appropriately protect important habitats.
3.20	Investment in increased green space in urban areas including a park of regional significance in Waterford city	Investment in increased green space in urban areas including a park of regional significance in Waterford city - ensuring local authority led development is carried out in a manner that has due regard to relevant planning and environmental protection requirements.
3.22	Act on the findings of the Copper Coast stabilisation report	Act on the findings of the Copper Coast stabilisation report, having due regard to environmental sensitivities associated with coastal areas such as the receiving marine environment, biodiversity, European sites, recreation and amenity value.
3.26	Support and inform a climate-proofing programme for natural water resources to manage flooding at the catchment level. Through advising the farming community and running information campaigns.	Support and inform a climate proofing programme for natural water resources, and to better manage flooding at the catchment level. The Council will identify a sub-catchment where water quality objectives are not being met, and where there is an established flood risk. Due regard is to be given to the maintenance and improvement of water quality in line with the aims of the Water Framework Directive.
3.27	Increase the amount of permeable spaces in the County. Ensure that new housing and streetscapes incorporate permeability (Nature Based Solutions and Sustainable Urban Drainage Systems)	Increase the amount of permeable spaces in the County. Ensure that new housing and streetscapes incorporate permeability (Nature Based Solutions and Sustainable Urban Drainage Systems), having appropriate regard to local environmental sensitivities such as the receiving water environment, biodiversity European sites and cultural heritage considerations.
4.1	Climate proofing of Community Funded Projects (e.g., Town & Village) (Sustainability and Climate Change scoring on grant assessment)	Climate proofing of Community Funded Projects (e.g., Town & Village) (Sustainability and Climate Change scoring on grant assessment); ensuring the protocol has appropriate regard to environmental protection requirements, environmental sensitivities such as European Sites, biodiversity and opportunities for promoting climate action co-benefits.
4.5	Renewable Energy Use for festivals. Review affordability of HVO generators from local suppliers. Review infrastructure needed to put in mains power for future festivals.	Renewable Energy Use for festivals. Review affordability of HVO generators from local suppliers. Review infrastructure needed to put in mains power for future festivals - having due regard to environmental sensitivities such as European Sites and biodiversity related sensitivities.
DZ 1.3	Develop a Carbon Neutral Community programme where we establish an energy cooperative in a pilot community and deliver renewable energy and energy efficiency solutions for homes and transport	Develop a Carbon Neutral Community programme where we establish an energy cooperative in a pilot community and deliver renewable energy and energy efficiency solutions for homes and transport. Due regard shall be had to relevant planning and environmental protection criteria, including the need to protect European sites, when implementing this action.
DZ 1.4	Work on an area by area basis (City Centre, Ballybricken, Carrickpherish, Poleberry etc.) over a number of months to have a presence in the community to provide advice to the public and businesses while also delivering projects in Active Travel, Presentation, Roads, Climate Adaptation, Housing etc.	Work on an area by area basis (City Centre, Ballybricken, Carrickpherish, Poleberry etc.) over a number of months to have a presence in the community to provide advice to the public and businesses while also delivering projects in Active Travel, Presentation, Roads, Climate Adaptation, Housing etc. To provide information on existing services and to collaborate with the community going forward to develop projects and source financing/funding. Breaking the Decarbonisation Zone plan down to manageable community



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	To provide information on existing services and to collaborate with the community going forward to develop projects and source financing/funding. Breaking the Decarbonisation Zone plan down to manageable community actions	actions. Due regard shall be had to relevant planning and environmental protection criteria, including the need to protect European sites, when implementing this action.
DZ 2.1	Sustainable Urban Drainage systems to be incorporated in street upgrades, Council building projects and private developments.	Sustainable Urban Drainage systems to be incorporated in street upgrades, Council building projects and private developments, having due regard to environmental sensitivities such as European sites, biodiversity, air and water quality.
DZ 2.3	Work with 4 regions in the city (e.g., Ballybricken, Carrickpherish) to co-design with the community climate adaptation interventions - planting, SUDS, green roofs rainwater harvesting etc.	Work with 4 regions in the city (e.g., Ballybricken, Carrickpherish) to co-design with the community climate adaptation interventions - planting, SUDS, green roofs rainwater harvesting etc. - having due regard to environmental sensitivities, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.
DZ 2.6	Put in place a park of regional significance as per County Development Plan incorporating Nature Based Solutions to reduce flood likelihood	Put in place a park of regional significance as per County Development Plan incorporating Nature Based Solutions to reduce flood likelihood - having due regard to environmental sensitivities, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and traffic and transport conditions.
DZ 2.7	Climate Adaptation measures to be incorporated into all Council developments going forward - larger downpipes, SUDS, Nature Based Solutions	Climate Adaptation measures to be incorporated into all Council developments going forward - larger downpipes, SUDS, Nature Based Solutions - having due regard to environmental sensitivities, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.
DZ 2.8	Implementing permeable surfaces (bioswales / rainbeds / pervious pavement) - requirement in new developments	Implementing permeable surfaces (bioswales / rainbeds / pervious pavement) - requirement in new developments - having due regard to environmental sensitivities, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.
DZ 4.2	Deliver a 50% energy efficiency improvement in Council owned buildings	Deliver a 50% energy efficiency improvement in Council owned buildings, having due regard to environmental sensitivities such as landscape and visual amenity, European Sites, biodiversity, sensitive human receptors and the need appropriately conserve built and cultural heritage.
DZ 4.4	Work with partners to deliver a District Heating Scheme for Waterford City	Work with partners to deliver a District Heating Scheme for Waterford City, having due regard to environmental sensitivities such as Biodiversity, European sites, water quality and hydrology, and air quality.
DZ 4.6	Upgrade of public buildings to BER B	Upgrade of public buildings to BER B, having due regard to environmental sensitivities such as Biodiversity, European sites, and the need to appropriately conserve built and cultural heritage.
DZ 4.7	Do a review of Council owned land in the city for solar suitability. Develop solar energy projects. Study to be done in conjunction with SETU	Do a review of Council owned land in the city for solar suitability. Ensure such a review has appropriate regard to planning and environmental considerations. Develop solar energy projects - ensuring such projects



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
		promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects. Study to be done in conjunction with SETU.
DZ 4.8	Deploy solar energy on all Council buildings with a floor area of greater than 250m2	Deploy solar energy on all Council buildings with a floor area of greater than 250m2 - having due regard to environmental sensitivities such as landscape and visual amenity, European Sites, biodiversity, sensitive human receptors and the need appropriately conserve built and cultural heritage.
DZ 4.9	Replace inefficient streetlights with LEDs	Replace inefficient streetlights with LEDs, while having due regard for the impact the spectrum of light used will have on protected nocturnal species such as bats.
DZ 4.10	Development of a Smart City District on O Connell Street and the Quays (centralised at the Munster Express Building) that will use sensors to maximise energy production, efficient energy use, report risk of drain flooding and communicate air quality impacts	Development of a Smart City District on O Connell Street and the Quays (centralised at the Munster Express Building) that will use sensors to maximise energy production, efficient energy use, report risk of drain flooding and communicate air quality impacts. Ensure due regard is had to environmental sensitivities during development processes.
DZ 4.12	Through the Croí Conaithe scheme bring existing buildings up to a high energy efficient standard ensuring occupancy rates are high in our city centre	Through the Croí Conaithe scheme bring existing buildings up to a high energy efficient standard ensuring occupancy rates are high in our city centre, having due regard to environmental sensitivities such as protected species associated with such buildings, European sites, biodiversity, and the need to appropriately conserve built and cultural heritage.
DZ 4.13	Removal of fossil fuel heating from all Council buildings	Removal of fossil fuel heating from all Council buildings, having due regard to environmental sensitivities such as protected species associated with such buildings, European sites, biodiversity, and the need to appropriately conserve built and cultural heritage.
DZ 4.14	In conjunction with the Local Enterprise Office compile a strategy for developing the Geothermal Industry in Waterford City Along with conducting a feasibility study for the city based on GSI recommendations	In conjunction with the Local Enterprise Office compile a strategy for developing the Geothermal Industry in Waterford City Along with conducting a feasibility study for the city based on GSI recommendations. Ensure such a study has appropriate regard to planning and environmental considerations and constraints.
DZ 4.16	Update Renewable Energy Strategy, within City and County Development Plan	Update Renewable Energy Strategy, within City and County Development Plan. Ensure planning and environmental protection related factors are appropriately considered in the strategy.
DZ 4.18	North Quays to be an exemplary example of sustainable energy technologies	North Quays to be an exemplar example of sustainable energy technologies; having due regard planning and environmental considerations.
DZ 4.19	Develop a "Hydrogen Energy Strategy" for Waterford City and resource implementation of aspects of the National Strategy that can be advanced in Waterford	Develop a "Hydrogen Energy Strategy" for Waterford City and resource implementation of aspects of the National Strategy that can be advanced in Waterford. Ensure planning and environmental protection related factors are appropriately considered in the strategy.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
DZ 4.20	Exploit Waterford's Shallow Geothermal opportunities by including Geothermal as a heat source for a District Heating and by including Geothermal heating where suitable in Council redevelopment projects	Exploit Waterford's Shallow Geothermal opportunities by including Geothermal as a heat source for a District Heating and by including Geothermal heating where suitable in Council redevelopment projects. Progress development supported by this action in a manner that maximizes climate action co-benefits and accords with relevant environmental protection requirements.
DZ 4.21	Develop Solar Car port projects (1MW) and a solar farm within the city (19MW)	Develop Solar Car port projects (1MW) and a solar farm within the city (19MW); having due regard to environmental sensitivities such as landscape and visual amenity, European Sites, biodiversity, sensitive human receptors and the need appropriately conserve built and cultural heritage.
DZ 4.22	Investigate the requirements for large scale installation of low carbon sources of heating (air/ground/water source heat pumps), using council owned homes as a test bed in partnership with grid operators and supply chains.	Investigate the requirements for large scale installation of low carbon sources of heating (air/ground/water source heat pumps), using council owned homes as a test bed in partnership with grid operators and supply chains, having due regard to planning and environmental protection considerations associated with such projects.
DZ 6.1	Investigate the possibility of creating a Green Bond for the city which can be used to invest in renewable energy.	Investigate the possibility of creating a Green Bond for the city which can be used to invest in appropriately planned renewable energy.
DZ 2.10	Plant 100,000 trees within the Metropolitan area	Plant 100,000 native trees within the Metropolitan area
DZ 2.11	Carbon sequestration through detailed tree / meadow planting / growing, rewilding, soil management, waterways and wetland planning, informed by habitat mapping, opportunity mapping and tree canopy surveys	Carbon sequestration through detailed tree / meadow planting / growing, rewilding, soil management, waterways and wetland planning, informed by habitat mapping, opportunity mapping and tree canopy surveys. These actions shall be overseen by a competent ecology team, and shall have due regard to the need to appropriately manage these habitats.
DZ 8.2	Integration of renewable energy, EV charging, active travel infrastructure into new developments	Integration of renewable energy, EV charging, active travel infrastructure into new developments, having due regard to opportunities to promote climate action co-benefits, and relevant planning and environmental protection requirements.
DZ 8.3	In URDF projects facilitate a city centre cooperative community with a collective skill set that can tackle renovation projects from within its own resources. This work should have a focus on Circular Economy, making tools and skills available for people to do up properties that they can live in	In URDF projects facilitate a city centre cooperative community with a collective skill set that can tackle renovation projects from within its own resources. This work should have a focus on Circular Economy, making tools and skills available for people to do up properties that they can live in - whilst promoting the need for supported projects to adhere to relevant planning and environmental protection requirements.
DZ 5.8	Continue to engage with businesses encouraging them to save energy with the Commercial Energy Rates Discount Scheme	Continue to engage with businesses encouraging them to save energy with the Commercial Energy Rates Discount Scheme - whilst promoting the need for supported projects to adhere to relevant planning and environmental protection requirements.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
DZ 10.3	Install 33.9 Km of cycle lanes	Install 33.9 Km of cycle lanes, whilst having due regard to environmental sensitivities such as European sites, biodiversity and water and air quality.
DZ 10.4	Review public parking and staff parking to see the impact of car pooling, car sharing, public transport and active travel to identify areas where different usages could be applied for those spaces	Review public parking and staff parking to see the impact of car pooling, car sharing, public transport and active travel to identify areas where different usages could be applied for those spaces, having due regard to opportunities to promote climate action co-benefits, nature-based solutions, SuDS, and relevant environmental protection requirements.
DZ 10.6	Install 3 Km of upgraded footpaths along with maintaining existing footpaths	Install 3 Km of upgraded footpaths, whilst having due regard to environmental sensitivities such as European sites, biodiversity and water and air quality.
DZ 10.14	Complete an EV charging strategy and apply for the Neighbourhood Charging Fund for the required number of chargers and ensure that all new plannings for developments include the legally mandated EV charger requirement	Complete an EV charging strategy and apply for the Neighbourhood Charging Fund for the required number of chargers and ensure that all new plannings for developments include the legally mandated EV charger requirement. Ensure development supported by the strategy is delivered in a manner that has due regard to environmental sensitivities (European sites, biodiversity, built heritage) and available grid capacity.
DZ 10.15	Deliver at least 5 Safe Routes to Schools campaigns at City Schools - this will depend on school demand	Deliver 5 School streets campaigns. Ensure any ancillary development has due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites and local air quality.
DZ 10.17	Review of bus lanes in the city and extension as part of the Bus Connects programme	Review of bus lanes in the city and extension as part of the Bus Connects programme, having due regard to transport planning related factors.
DZ 10.28	Delivery of Park and Ride	Delivery of Park and Ride - having due regard to planning and environmental protection considerations, including transport planning factors.
DZ 10.1	Completion of the Sustainable Transport Bridge between Ferrybank and Waterford City	Completion of the Sustainable Transport Bridge between Ferrybank and Waterford City, subject to planning and environmental protection related requirements.
DZ 10.30	Continue to work with the NTA to provide infrastructure for the bus network - the city bus network will be electrified and extended within this period with input from the Council	Continue to work with the NTA to provide infrastructure for the bus network - the city bus network will be electrified and extended within this period with input from the Council. Promote integrated planning and consultation and adherence to planning and environmental protection requirements, including the appropriate consideration of available grid capacity, during projects supported by this action.



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 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.</p>
<p>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.</p>
<p>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.</p>
<p>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.</p>
<p>Promote climate action projects that support protected trees, hedgerows and other habitats such as wetlands, flood zones 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 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.</p>
<p>Support opportunities to promote peatland restoration, rehabilitation and maintenance while achieving climate targets through the implementation of the climate actions within the plan.</p>



3. CONSIDERATION OF ALTERNATIVES

3.1 Introduction

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

3.2 Approach to Developing Reasonable Alternatives

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

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

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

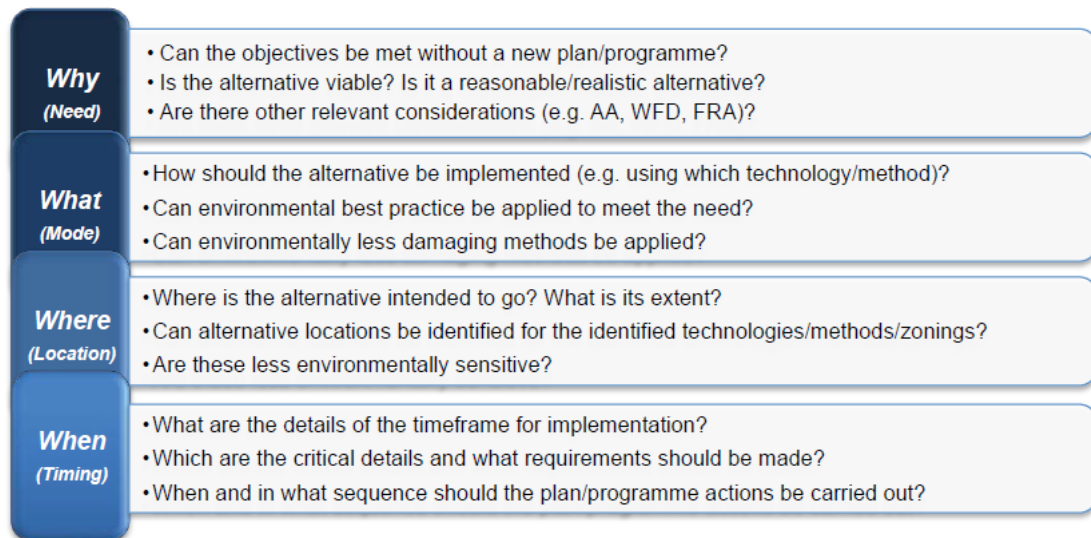


Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3 Developing and Assessing Alternatives in the Strategic Environmental Assessment Process (EPA, 2015).

3.3 Identification and Description of Reasonable Alternatives

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

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



Table 3-1: Reasonable Alternatives to the LACAP

Reasonable Alternative	Description of Reasonable Alternative	Reasoning for selecting this Reasonable Alternative
<p>Alternative 1 - The Pareto Approach: Prioritize reducing GHG emissions from largest GHG emitting sectors to mitigate against climate change impacts.</p>	<p>This alternative involved developing a LACAP that primarily focusses on climate mitigation and reducing GHG emissions associated with the largest GHG emitting sectors in the County that a local authority can reasonable influence having regard to the functions of a local authority - the Residential and Transport sectors.</p>	<p>This was a viable alternative that could achieve a significant reduction in GHG emissions by prioritizing and supporting climate mitigation related action for the Residential and Transport sectors. The alternative would cover the period from 2024 to 2029 (the duration of the prospective LACAP).</p>
<p>Alternative 2 - The Holistic Approach: Adopt a multi-pronged approach and focus on a range of priority areas to mitigate against and adapt to climate change impacts.</p>	<p>This alternative involved developing a LACAP that has a balanced focus on both climate mitigation and adaptation across several theme areas and all socio-economic sectors.</p>	<p>This was a viable alternative that would have enhanced potential to reduce GHG emissions across multiple sectors, potential to offset GHG emissions, and greater potential to protect the local community and the environment from climate change related risks. Climate mitigation and adaptation actions across a wide breath of theme areas would be supported by the LACAP. The alternative would cover the period from 2024 to 2029 (the duration of the prospective LACAP).</p> <p>This alternative will promote the creation of a range of climate action co-benefits, including potentially co-benefits for biodiversity and European sites.</p>
<p>Alternative 3 - The Holistic and Participatory Approach (Current LACAP): Adopt a multi-pronged approach - that has a strong community engagement emphasis - and focus on a range of priority areas to mitigate against and adapt to climate change impacts.</p>	<p>This alternative involved developing a LACAP that has a balanced focus on both climate mitigation and adaptation across several theme areas and all socio-economic sectors, and which has a strong community engagement emphasis, which underpins, supports and drives the climate action contained in the plan.</p>	<p>This was a viable alternative that would have enhanced potential to reduce GHG emissions across multiple sectors, potential to offset GHG emissions, and greater potential to protect the local community and the environment from climate change related risks. Climate mitigation and adaptation actions across a wide breath of theme areas would be supported by the LACAP. The range of climate mitigation and adaptation actions defined in the LACAP is likely to have better community level and organizational support given its strong community engagement emphasis. The alternative would cover the period from 2024 to 2029 (the duration of the prospective LACAP).</p> <p>This alternative will promote the creation of a range of climate action co-benefits, including potentially co-benefits for biodiversity and European sites.</p>



3.4 Evaluation of Reasonable Alternatives and Reasons for Choosing the Preferred Plan

An evaluation of the potential effects of the reasonable alternatives on the baseline environment was carried out in accordance with the SEA Directive and best practice guidelines. This evaluation is documented in the SEA Environmental Report for the LACAP. A summary of this evaluation and the reason for choosing the preferred Plan is presented below.

Alternative 1 - The Pareto Approach - would lead to some positive environmental effects and would have resulted in the reduction of GHG emissions in the sectors that the local authority can control or exert substantial influence on that contribute most in terms of GHG emission in the County - the Residential and Transport sectors. It is less likely that this alternative would have delivered the wide-ranging climate mitigation and offsetting related action required to fully realize GHG emission reduction potential in the County. It is also less likely this alternative would have defined a wide range of climate adaptation measures that would fully protect biodiversity, heritage resources, environmental receptors and people from climate change risks. This alternative approach may have generated several negative environmental effects, which would not be counterbalanced by the positive environmental effects associated with Alternatives 2 and 3.

Alternative 2 - The Holistic Approach - and Alternative 3 - The Holistic and Participatory Approach - would have both broadly delivered suitably wide ranging and effective climate action. These alternatives have the potential to generate multiple positive environmental effects, including a reduction in GHG emissions at organizational, community and sectoral levels, in addition to a variety of other environmental benefits. These alternatives would have placed a balanced emphasis on both climate mitigation and adaptation action, ensuring climate change related environmental risks are adequately understood and managed at community level. These alternatives will promote the creation of a range of climate action co-benefits, including potentially co-benefits for biodiversity and European sites.

Alternative 3 had the best potential to deliver effective climate action given its holistic, wide encompassing nature; and given its strong community engagement emphasis, which supports better participation in climate action at community level. Alternative 3 had better potential therefore to fully realize potential environmental effects than Alternative 2.

Reasonable Alternative 3 - The Holistic and Participatory Approach - therefore constituted the preferred alternative or preferred plan.



4. AA CONCLUSION

AA Screening of a draft version of the LACAP (the Draft LACAP) concluded that the Plan was likely to have significant effects on European sites forming part of the Natura 2000 network (in the absence of mitigation), either alone or in combination with other plans and projects.

It was concluded a Natura Impact Report (NIR) should be prepared for the Draft LACAP. Careful considerations were required with regard to the technical wording, focus and scope of the actions contained within the Draft LACAP, such that effects are avoided and/or minimised with regard to European sites and their Qualifying Interests and Special Conservation Interests.

A NIR was produced for the Draft LACAP. The NIR considered the potential for the LACAP to adversely affect the integrity of European sites, with regard to their Qualifying Interests and Special Conservation Interests. The Draft LACAP was informed by the AA and a Natura Impact Report was prepared outlining the likely environmental effects of the Plan on European sites in accordance with the Habitats Directive 92/43/EEC. Measures were integrated into the Draft LACAP that mitigate its potential effects on any European site.

The draft version of this NIR has been consolidated and finalized having regard to the consultation submissions made during the Draft Plan consultation period, recommendations made in the Chief Executive (CE) Report on consultation submissions, and the modifications made to the original draft version of the LACAP that was put on display for consultation. The updates made to the report were clerical or minor and non-material in nature and have not changed the parameters of the environmental/ecological assessment undertaken or the environmental mitigation defined.

The Plan modifications arising from the consultation process, the CE Report, and the post consultation plan-making process were screened for AA. The Plan modifications were determined to be non-material and did not introduce any additional environmental/ecological effects not previously considered and mitigated during the SEA and AA processes.

The consolidated, final NIR for the LACAP accompanies this AA Conclusion Statement.

The NIR concluded the following:

- Stage 1 AA Screening and Stage 2 AA of the Waterford 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 Waterford Local Authority Climate Action Plan 2024-2029 is not foreseen to give rise to any significant adverse effects on designated European sites, alone or in combination with other plans or projects. This evaluation is made in view of the conservation objectives of the habitats or species, for which these sites have been designated.



Having regard to the above, the plan as adopted will not have an adverse effect on the integrity of any European site.



**CONSULTANTS IN ENGINEERING,
ENVIRONMENTAL SCIENCE
& PLANNING**

www.fehilytimoney.ie

 **Cork**

 **Dublin**

 **Carlow**



Local Authority Climate Action Plan 2024 – 2028 for the Waterford City & County Council functional area

Appropriate Assessment (AA) Determination under the EU's Habitats Directive 92/43/EEC Article 6(3) as transposed into Irish law under Regulation 42(1) of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477/2011), as amended

An Appropriate Assessment (AA) Determination is being made in relation to the potential for the Waterford City & County Council Local Authority Climate Action Plan (LACAP) 2024 – 2029 to have effects on the integrity of European sites.

Article 6(3) of the Habitats Directive, as transposed by S.I. No. 477/2011, as amended, requires that a final determination is made as to whether a plan or project would adversely affect the integrity of a European site.

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.

Modifications to the Draft LACAP were made following a review of the issues raised during a period of prescribed public consultation period for the Draft LACAP from 1st November 2023 to 15th December 2023 and subsequent consideration by Waterford City & County Council. Following assessment and having regard to the nature of the Modifications to the Draft LACAP and the potential for likely significant environmental effects associated with the Modifications, Waterford City & County Council concluded, in view of best scientific knowledge and in view of conservation objectives, that the Modifications to the Draft LACAP will not give rise to any likely significant effects on designated European sites, alone or in combination with other plans or projects. An AA Screening Determination was made in relation to this effect.

Overall, the AA process concluded the following:

- Stage 1 AA Screening and Stage 2 AA of the Waterford City & County Council 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 Waterford City & County Council LACAP 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.

In light of the above, Waterford City & County Council, pursuant to Article 6(3) of the Habitats Directive, as transposed by S.I. No. 477/2011, as amended, determines that the adoption and implementation of the LACAP will not individual or in combination with any other plan or project adversely affect the integrity of any European site.

Signed by: *Bráinne Kennedy* Climate Action Coordinator

Date: 1.2.24