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LOCAL AUTHORITY CLIMATE ACTION PLAN

Appropriate Assessment Conclusion Statement

Prepared for:
Dublin City Council



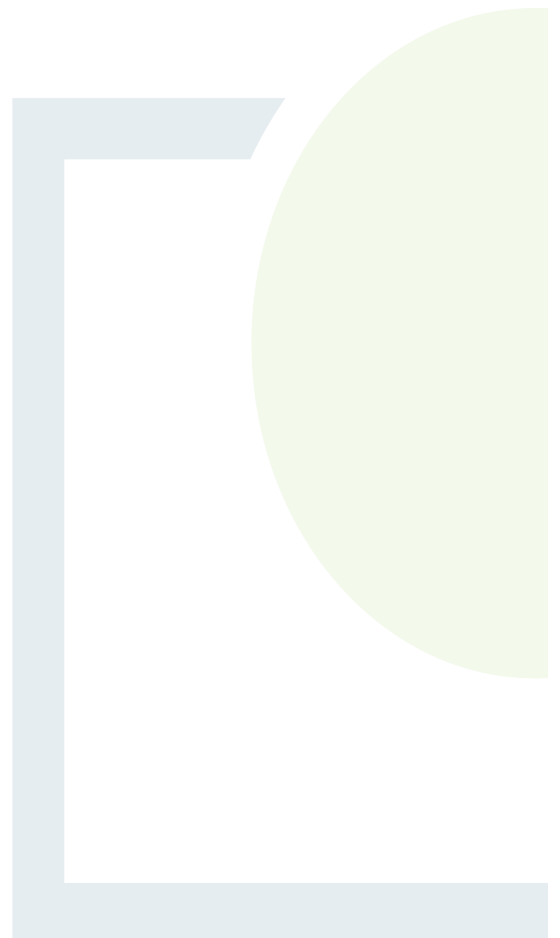
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APPROPRIATE ASSESSMENT CONCLUSION STATEMENT

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

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1. INTRODUCTION

1.1 Background

This is the Appropriate Assessment (AA) Conclusion Statement for the Dublin City 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.¹ 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:
R1	<p>Social Housing Regeneration: We are the largest landlord in the country, with a stock of 214 flat complexes and 10,000 houses, this is an opportunity to demonstrate and set the standard for sustainable living. We will build on our experience with energy retrofitting to prepare our housing for climate change. Our flagship project will be Dominick Street Lower. This project will demonstrate climate resilient housing retrofit that enables and encourages residents to live sustainably with ease through the provision of, for example: green spaces to grow, play and create; shared spaces to meet and innovate; segregated waste facilities, renewable energy generation (solar PV, geothermal and micro wind generation where feasible), and mobility options (shared bikes, micro mobility and EV charging).</p>	<p>Social Housing Regeneration: We are the largest landlord in the country, with a stock of 214 flat complexes and 10,000 houses, this is an opportunity to demonstrate and set the standard for sustainable living. We will build on our experience with energy retrofitting to prepare our housing for climate change. Our flagship project will be Dominick Street Lower. This project will demonstrate climate resilient housing retrofit that enables and encourages residents to live sustainably with ease through the provision of, for example: green spaces to grow, play and create; shared spaces to meet and innovate; segregated waste facilities, renewable energy generation (solar PV, geothermal and micro wind generation where feasible), and mobility options (shared bikes, micro mobility and EV charging). All social housing regenerations projects will have due regard to protected species such as Annex IV species and where appropriate bat roost surveys will be undertaken to inform such works. All regeneration projects will have due regard to the need to appropriately protect, conserve and enhance protected structures in accordance with protected structures legislation.</p>
R2	<p>Public Buildings Regeneration: Our social housing will serve as the exemplar for domestic buildings, our public buildings will demonstrate how heritage buildings can be adapted and retrofitted for a climate resilient future. As with our social housing, our buildings – 2 galleries, 22 libraries, 12 community centres, 17 sports and recreation centres, and operations depots – will demonstrate what is possible.</p>	<p>Public Buildings Regeneration: Our social housing will serve as the exemplar for domestic buildings, our public buildings will demonstrate how heritage buildings can be adapted and retrofitted for a climate resilient future. As with our social housing, our buildings – 2 galleries, 22 libraries, 12 community centres, 17 sports and recreation centres, and operations depots – will demonstrate what is possible. All retrofitting and maintenance works will prioritise energy efficiencies, segregated waste facilities, renewable energy generation (solar PV, geothermal and micro wind generation where feasible), and mobility options (shared bikes, micro mobility and EV charging); having due regard to environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value etc.</p>
R3	<p>Climate Resilient Critical Infrastructure: The city’s infrastructure that enables us to live, work and play needs to be resilient. Ensuring that our drainage system, utilities, roads, public lighting and communications networks are maintained and upgraded is essential. This requires working in partnership with Irish Water, the OPW, ESB, Eirgrid, NTA, and DECC. Together we will insure that these critical systems are prepared for the future. Our flagship energy project, the Dublin District Heating System (DDHS) will contribute to our energy security by providing an alternative to electricity based heating systems. This will be further supported by geothermal.</p>	<p>Climate Resilient Critical Infrastructure: The city’s infrastructure that enables us to live, work and play needs to be resilient. Ensuring that our drainage system, utilities, roads, public lighting and communications networks are maintained and upgraded is essential. This requires working in partnership with Irish Water, the OPW, ESB, Eirgrid, NTA, and DECC. Together we will insure that these critical systems are prepared for the future. Our flagship energy project, the Dublin District Heating System (DDHS) will contribute to our energy security by providing an alternative to electricity based heating systems. This will be further supported by geothermal. DCC is also facilitating the delivery of public electric vehicle charging infrastructure in collaboration with key partners including ZEVI and ESB Networks.</p>



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	<p>DCC is also facilitating the delivery of public electric vehicle charging infrastructure in collaboration with key partners including ZEVI and ESB Networks.</p>	<p>Public Lighting Upgrades will prioritise energy efficient systems while ensuring the lumen levels and spectral range are maintained or reduced/controlled to avoid effects to biodiversity. All infrastructure projects under this action will have due regard to environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value etc.</p>
RF1	<p>A Nature Full City: Nature provides us with resources to live and thrive. Delivering on our parks and greening strategies will increase the green cover of the city and improve air quality, water quality, and health and well-being. Prioritising green infrastructure that connects existing parks will not only improve the look and atmosphere of our streets making your commute more enjoyable, but will also provide pollinators, birds, and other animals with food and places to live. Ensure connectivity projects priorities ecological connectivity through complex hedgerow development and maintenance, while ensuring barrier effects such as inappropriate lighting are avoided. Providing the public with the opportunity to learn about biodiversity is essential to insuring that the nature based solutions we implement thrive. The Dublin Bay UNESCO Biosphere Discovery Centre and the Liffey Vale Biodiversity Centre, will provide people with the opportunity to learn about our natural heritage and how we can all take steps to conserve our environment.</p>	<p>A Nature Full City: Nature provides us with resources to live and thrive. Delivering on our parks and greening strategies will increase the green cover of the city and improve air quality, water quality, and health and well-being. Prioritising green infrastructure that connects existing parks will not only improve the look and atmosphere of our streets making your commute more enjoyable, but will also provide pollinators, birds, and other animals with food and places to live. Ensure connectivity projects priorities ecological connectivity through complex hedgerow development and maintenance, while ensuring barrier effects such as inappropriate lighting are avoided. Providing the public with the opportunity to learn about biodiversity is essential to insuring that the nature based solutions we implement thrive. The Dublin Bay UNESCO Biosphere Discovery Centre and the Liffey Vale Biodiversity Centre, will provide people with the opportunity to learn about our natural heritage and how we can all take steps to conserve our environment. Natural heritage education will focus on challenging environmental perceptions to foster environmental stewardship through appropriately managed engagement with nature. All infrastructure projects under this action will have due regard to environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value etc. Furthermore works ensure appropriate bat roost investigation surveys and appropriate measures taken to ensure no significant impacts occur to any Annex IV species.</p>
RF2	<p>Restoring the City's Rivers: Growing around the River Liffey and its tributaries, residents of the city flourished, harvesting vegetables in the hinterlands, trading livestock at marts in the city, and bringing spices in from the port. Our city's rivers and canals have defined Dublin. Their restoration plays a vital role in the city's future. In our development plan we have committed to de-culverting and giving our vital rivers space. Measures will also see our rivers provide people with places for recreation and connection with nature. Our restoration plans for the River Santry demonstrate what is possible, and we will re-imagine how we celebrate the River Liffey.</p>	<p>Restoring the City's Rivers: Growing around the River Liffey and its tributaries, residents of the city flourished, harvesting vegetables in the hinterlands, trading livestock at marts in the city, and bringing spices in from the port. Our city's rivers and canals have defined Dublin. Their restoration plays a vital role in the city's future. In our development plan we have committed to de-culverting and giving our vital rivers space. Measures will also see our rivers provide people with places for recreation and connection with nature. Our restoration plans for the River Santry demonstrate what is possible, and we will re-imagine how we celebrate the River Liffey. All recreational activities being promoted or developed under the action will have due regard to all environmental constraints such as Biodiversity and European sites, where required appropriate visitor management plans and appropriate signage will be developed to ensure appropriate management processes are put in place to avoid significant adverse effects. Similarly, infrastructure works will have integrated environmental considerations within the feasibility assessment.</p>



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
RF3	Re-Use of Buildings: We know that the lowest carbon building is one that is already built. Re-using existing buildings provides an opportunity to build on existing programmes, for example adaptive re-use which is converting vacant commercial buildings into housing. This also aligns with the EU Performance of Buildings Directive. We will also use vacant buildings to support enterprises by identifying buildings suitable for incubation hubs and community spaces.	Re-Use of Buildings: We know that the lowest carbon building is one that is already built. Re-using existing buildings provides an opportunity to build on existing programmes, for example adaptive re-use which is converting vacant commercial buildings into housing. This also aligns with the EU Performance of Buildings Directive. We will also use vacant buildings to support enterprises by identifying buildings suitable for incubation hubs and community spaces. All reuse projects will have due regard to the need to appropriately protect, conserve and enhance protected structures in accordance with protected structures legislation.
C3	Innovation Districts: Our Smart City programme is developing innovation districts that bring together diverse SMEs to create solutions that improve the city. Smart Districts are strategically selected locations across Dublin where innovation projects are fast-tracked. Smart Districts are designed in partnership with citizens, industry, and academia. Each Smart District is unique, with projects designed to meet the specific needs of those who live and work there.	Innovation Districts: Our Smart City programme is developing innovation districts that bring together diverse SMEs to create solutions that improve the city. Smart Districts are strategically selected locations across Dublin where innovation projects are fast-tracked. Smart Districts are designed in partnership with citizens, industry, and academia. Each Smart District is unique, with projects designed to meet the specific needs of those who live and work there. 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.
C4	Decarbonisation Zones: We will build on this knowledge and experience gained from our smart districts, and develop our two decarbonisation zones in Ringsend and Poolbeg, and Ballymun. The development of the decarbonisation plans for Ringsend and Poolbeg, and Ballymun, will be a collaborative effort to insure that the unique strengths of each zone come to the fore and permits ownership of the challenges and solutions.	Decarbonisation Zones: We will build on this knowledge and experience gained from our smart districts, and develop our two decarbonisation zones in Ringsend and Poolbeg, and Ballymun. The development of the decarbonisation plans for Ringsend and Poolbeg, and Ballymun, will be a collaborative effort to insure that the unique strengths of each zone come to the fore and permits ownership of the challenges and solutions. 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.
S1	A Connected Active Travel Network: Moving people through the city to meet friends and family, to go to work or school, or to simply explore must be easy and safe. We will bring together 95% of the population of the City within 400 metres of the active travel network; making it easier for people to walk, cycle, wheel or scoot to their destination or for leisure, day or night.	A Connected Active Travel Network: Moving people through the city to meet friends and family, to go to work or school, or to simply explore must be easy and safe. We will bring together 95% of the population of the City within 400 metres of the active travel network; making it easier for people to walk, cycle, wheel or scoot to their destination or for leisure, day or night. Community Participation Events to celebrate new active travel routes as they open and encourage use in a responsible manner to avoid/minimise impacts to biodiversity and the environment. Ecological connectivity will be considered with regard to hedgerow development and maintenance as well as the avoidance of barrier effects such as inappropriate lighting. All active travel projects will have due regard to environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value etc.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
S2	Neighbourhoods are the Heart: Dublin is said to be a city of villages and these villages have strong identities. This is a strength. Nurturing our neighbourhoods to ensure that they continue to thrive and support strong social networks is vital in preparing for climate change and preventing adverse impacts on our health and well-being, during and in the aftermath of an extreme event. We will build on our existing initiatives such as quiet zones and sustainable energy communities, pride of place, and tidy towns to increase our social, and economic resilience.	Neighbourhoods are the Heart: Dublin is said to be a city of villages and these villages have strong identities. This is a strength. Nurturing our neighbourhoods to ensure that they continue to thrive and support strong social networks is vital in preparing for climate change and preventing adverse impacts on our health and well-being, during and in the aftermath of an extreme event. We will build on our existing initiatives such as quiet zones and sustainable energy communities, pride of place, and tidy towns to increase our social, and economic resilience. A focus shall be placed on integrating climate action with considerations relating to pollinator friendly biodiversity to ensure a win-win scenario are achieved.
S4	A Re-imagined Public Realm: Public squares and the spaces in between are where life's stories are born. In a time of climate change our public realm has a lot to do. Not only will public spaces need to bring people together to play, chat, and create, they must be resilient to climate change impacts – providing shade as temperatures rise and water storage when the rainfall is intense or absent. Aligning our plans for a vibrant night time economy, providing public lighting, street furniture, waste segregation, active travel and greening will be a critical part of re-imagining public spaces that define our city.	A Re-imagined Public Realm: Public squares and the spaces in between are where life's stories are born. In a time of climate change our public realm has a lot to do. Not only will public spaces need to bring people together to play, chat, and create, they must be resilient to climate change impacts – providing shade as temperatures rise and water storage when the rainfall is intense or absent. Aligning our plans for a vibrant night time economy, providing public lighting, street furniture, waste segregation, active travel and greening will be a critical part of re-imagining public spaces that define our city. All lighting projects will have low lumens directional lighting designed with regard to ecological sensitivities. All works will due regard to environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value etc.
OS10	Monitor implementation of flood risk management guidelines in planning applications.	Monitor implementation of flood risk management guidelines in planning applications, having due regard for environmental sensitivities such as European sites, Biodiversity, Archaeology and amenity value etc.
OS11	Coordinate Emergency Response Plans aligned with Sendai Framework and revise based on learnings from management of response to events.	Coordinate Emergency Response Plans aligned with Sendai Framework and revise based on learnings from management of response to events; having due regard for environmental sensitivities such as European sites, Biodiversity, Archaeology and amenity value etc.
OS13	Environmental surveys of all City rivers and estuaries as baseline surveys from which to monitor ecosystem health.	Develop and complete environmental surveys of all City rivers and estuaries as baseline surveys from which to monitor ecosystem health.
OS17	Identify opportunities of introducing circular economy principles in Bring Centre Depots.	Identify opportunities of introducing circular economy principles in Bring Centre Depots and implement where appropriate.
OS18	Expand Depot collection of WEEE products to all Depots.	Expand Depot collection of WEEE products to all Depots, whilst ensuring such sites are operated in accordance with the requirements of the Waste Management Act and in a manner that does not result in environmental nuisance or pollution.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
OS21	Review terms and conditions for all events approved by DCC to incorporate possible sustainability conditions.	Review terms and conditions for all events approved by DCC to incorporate possible sustainability conditions and integrated considerations for biodiversity and other environmental sensitivities.
OS22	Develop strategy to convert fleet to low emission vehicles; and ensure end of life plans are in place for vehicles.	Develop strategy to convert fleet to low emission vehicles based on sustainable energy/fuel sources; and ensure end of life plans are in place for vehicles.
EP8	The Council will work with the Local Authority Waters Programme in its support of communities and stakeholders in the delivery of local water quality projects and initiatives.	The Council will work with the Local Authority Waters Programme in its support of communities and stakeholders in the delivery of local water quality projects and initiatives have due regard for environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value etc.
EP19	Support and promote Tidy Towns / City Neighbourhoods initiatives.	Support and promote Tidy Towns / City Neighbourhoods initiatives which have due regard for environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value etc.
EP28	Build partnerships with cities internationally to exchange best practice for climate action.	Build partnerships with cities internationally to exchange best practice for climate action and implement learnings into all future plans and projects.
EP32	Promote and encourage community involvement in the retrofit of SuDS in existing developments.	Promote and encourage community involvement in the retrofit of SuDS in existing developments: having due regard to environmental sensitivities such as Archaeology, European sites, biodiversity and amenity value etc.



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

<p>Promote climate action projects that support and maximize environmental co-benefits, such as biodiversity protection and enhancement; improved air, water or soil quality; or enhanced recreation, amenity and cultural heritage value, to ensure win-win benefits are gained.</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 and coastal defence projects, or related maintenance works, shall be carried out in a manner that promotes climate action-biodiversity related co-benefits, and shall have due regard for the protection and enhancement of rare, protected or important habitats and species.</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 unauthorized physical damage to cultural, archaeological or architectural features, or unauthorized 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, 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 city.</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.

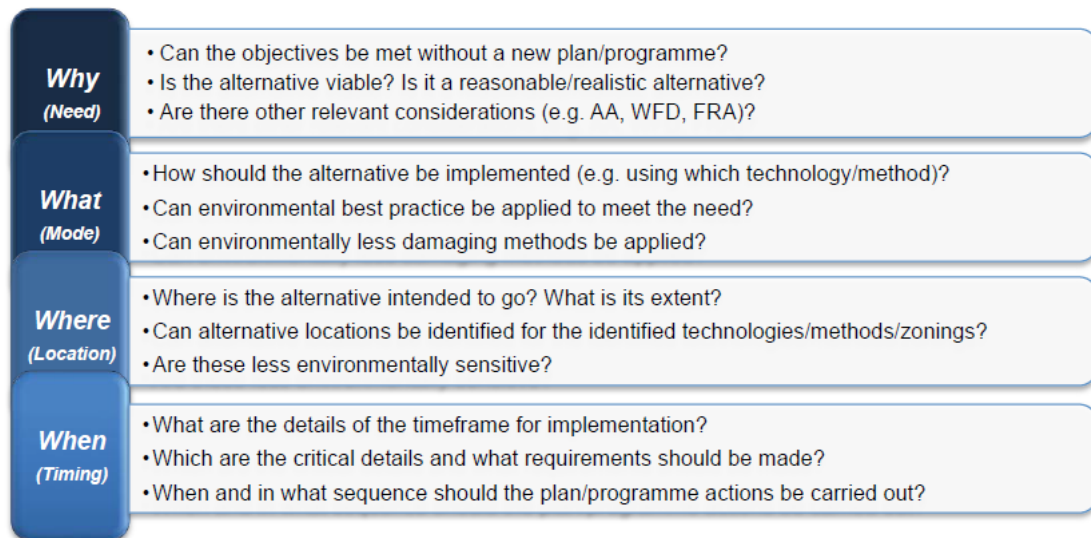


Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3 Developing and Assessing Alternatives in the Strategic Environmental Assessment Process (EPA, 2015).

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



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



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