



CONSULTANTS IN ENGINEERING,  
ENVIRONMENTAL SCIENCE &  
PLANNING

# LOCAL AUTHORITY CLIMATE ACTION PLAN

---

## Appropriate Assessment Conclusion Statement

---

**Prepared for:**  
Louth County Council



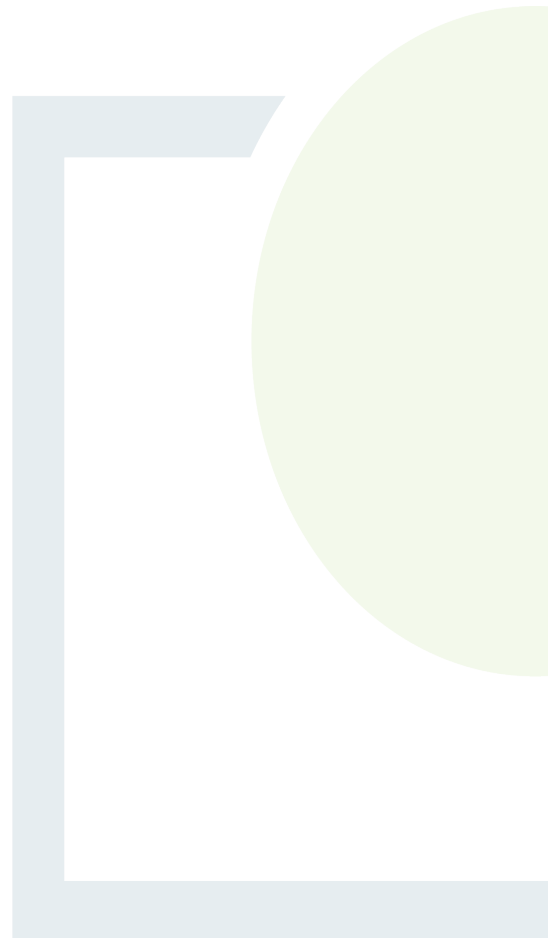
Comhairle Contae Lú  
Louth County Council

**Date:** March 2024

Core House, Pouladuff Road, Cork, T12 D773, Ireland  
T: +353 21 496 4133 | E: [info@ftco.ie](mailto:info@ftco.ie)

**CORK | DUBLIN | CARLOW**

[www.fehilytimoney.ie](http://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/EV/NSC	RD	AT	04/03/2024

**Client:** Louth 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 Louth Local Authority Climate Action Plan to Louth 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 .....	10
3.1	Introduction.....	10
3.2	Approach to Developing Reasonable Alternatives.....	10
3.3	Identification and Description of Reasonable Alternatives.....	11
3.4	Evaluation of Reasonable Alternatives and Reasons for Choosing the Preferred Plan .....	13
4.	AA CONCLUSION.....	14

## 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).....	11

## LIST OF TABLES

	<u>Page</u>
Table 2-1: Proposed Environmental Mitigation Measures - Additional text included in Plan actions relating to environmental protection related obligations and environmental enhancement opportunities.....	4
Table 2-2: Proposed Environmental Mitigation Measures - Environmental Governance Principles included in the plan .....	9
Table 3-1: Reasonable Alternatives to the LACAP.....	12



## 1. INTRODUCTION

### 1.1 Background

This is the Appropriate Assessment (AA) Conclusion Statement for the Louth 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).<sup>1</sup>

---

<sup>1</sup> This NIR provides the following information:

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



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

### 2.1 Integrated Biodiversity Assessment Approach

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

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

### 2.2 Mitigation through integration of environmental considerations into the LACAP

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

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

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

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

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



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

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



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

Action Reference	Original Action	Recommendations integrated into the Plan, included in:
1.13	Increase participation in SEAI Pathfinder programme for public sector	Attach the following text to the action:  whilst promoting - through control or influence, as appropriate - project adherence to planning and environmental protection criteria.
2.1	Demonstrate Leadership in the National Retrofitting Scheme for private homes across the county. By retrofitting our council housing stock, promoting best practice examples from within the county and providing information of accessing funding supports to interested members of the public.	Attach the following text to the action:  Promote the need to adhere to environmental protection requirements during retrofit projects, including the need to appropriately conserve-built heritage.
2.2	Compile a register of vacant properties, derelict sites and brownfield sites within Louth's main urban areas and use the current legislative process to facilitate their regeneration and return to full use. This will provide synergies with the urban regeneration works of the council	Attach the following text to the action:  Have due regard to the need to appropriately protect and conserve biodiversity and natural and built heritage.
2.3	Fully Deliver the National Sustainable Mobility Policy's Pathfinder projects for Dundalk and Drogheda.	Attach the following text to the action:  having due regard to heritage protection requirements.
2.4	Deliver additional active travel projects within the county to further develop walking and cycling as an alternative to private car use.	Attach the following text to the action:  Ensure supported active travel development is carried out in a manner that has due regard to environmental sensitivities such as biodiversity, European sites, water quality and hydrology.
2.5	Develop a fleet usage policy for Louth County Council. This policy is to allow for decarbonisation of the LCC fleet by examining options around vehicle usage, fuel types, ownership or hire options, service continuity, centralised procurement. Decarbonise the Louth County Council fleet to the maximum allowable level, while maintaining service delivery by enacting the recommendations from the fleet usage policy	Reword to the following:  Develop a fleet usage policy for Louth County Council. This policy is to allow for decarbonisation of the LCC fleet by examining options around vehicle usage, fuel types, ownership or hire options, service continuity, centralised procurement. Sustainably decarbonise the Louth County Council fleet to the maximum allowable level, while maintaining service delivery by enacting the recommendations from the fleet usage policy.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
2.8	Build on Louth's leading position by decarbonising the public Lighting in County Louth by completing the National Public Lighting Energy Efficiency Project.	Attach the following text to the action:  while ensuring the lumen levels and spectral range are maintained or reduced/controlled to avoid effects to biodiversity.
2.9	Development of EV charging infrastructure plan for Louth	Attach the following text to the action:  Ensure such development promotes climate action co-benefits and does not contravene relevant environmental protection criteria or cause significant negative environmental effects.
2.14	Implement cycling strategies in Louth	Attach the following text to the action:  Ensure the cycling strategies have due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites and cultural heritage.
2.15	Develop walking strategy for Louth	Attach the following text to the action:  Ensure the walking strategy is developed in a manner that has due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites and cultural heritage.
3.2	Develop a new Local Biodiversity Action Plan for County Louth in line with the new national Biodiversity plan in accordance with the guidelines set out by the Heritage Council.	Attach the following text to the action:  This plan shall have a focus on use/promotion of native species.
3.6	Develop and implement a Nature-Based Solutions (NBS) and integrated rainwater management protocol for both Council and private sector projects. A protocol for NBS will address the following: i. Part 8 and Section 177AE applications for active travel, roads, public realm projects, public housing, footpath upgrades, public and council carparks, greenway/Blueway planning etc. with targets for all. ii. 'Taking in Charge' – put in a plan and resource taking in charge schemes. iii. Plan and resource maintenance iv. Build in education and awareness for public and elected members	Attach the following text to the action:  vii. Environmental protection requirements relating to projects involving the development of NBS.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
	v. Application of water sensitive urban design concepts vi. Inland Fisheries Ireland guidance for watercourses to be considered as part of relevant council policy.	
3.8	Update Fire management plan for Cooley Mountains	Attach the following text to the action:  Ecological expertise shall be sought during plan updating. The plan shall have due regard to the need to appropriately protect important habitats.
3.9	Develop a Coastal protection plan for Louth	Attach the following text to the action:  Ensure the plan has due regard to environmental sensitivities associated with coastal areas such as the receiving marine environment, biodiversity, European sites, recreation and amenity value.
3.10	Develop a Carbon sequestration plan for Louth	Attach the following text to the action:  whilst taking measures to promote the use of native plant species over non-natives, as appropriate.
3.11	Progress Flood Defence schemes Dundalk-Ardee Flood relief and Drogheda & Baltray flood relief scheme	Attach the following text to the action:  whilst having appropriate regard to environmental protection requirements associated with flood resilience development.
3.12	Implement Louth County Council hedgerow and trees policy	Attach the following text to the action:  Ensure that the policy promotes the use of native species over non-natives and has due regard for water quality and soil stability issues.
3.13	Develop Louth County Wetland Action Plan	Attach the following text to the action:  This plan shall be developed by a competent ecology team and shall have 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.
3.14	Ensure Sustainable Urban Drainage (SUDs) principles are implemented in Louth County Council works and conditioned, as appropriate, in grants of planning permission.	Attach the following text to the action:  having due regard to promoting nature-based solutions, protection of biodiversity and avoidance of habitat fragmentation.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
3.16	Develop a pesticide use policy & procedure for Louth County Council	Attach the following text to the action:  ensuring these substances are only used to a degree and an extent that does not cause significant effects on the receiving environment, such as the receiving water environment, biodiversity or European sites.
3.18	Alien invasive species plan for Louth	Attach the following text to the action:  This plan shall be developed by a competent ecology team and shall have due regard to the need to appropriately manage and prevent the spread of invasive species.
5.6	Develop a Clean Energy Policy for County Louth. This is to define the local authority's role in supporting green energy expansion and assess the current and emerging technologies.	Reword to the following: Develop a Clean Energy Policy for County Louth.  This is to define the local authority's role in supporting sustainable green energy expansion and assess the current and emerging technologies.
5.7	Support local level renewable energy and micro generation projects within county Louth and cooperate with neighbouring regions where opportunities are identified.	Attach the following text to the action:  Promote - through control or influence as appropriate - project accordance with planning and environmental protection requirements.
5.9	Support civic amenity sites to implement best practice circular economy initiatives	Attach the following text to the action:  whilst ensuring all supported initiatives accord with the provision of the Waste Management Act and do not lead to adverse environmental impacts or nuisance.
<b>Dundalk Blackrock Decarbonisation Zone</b>		
6.2	Identify a specific list of opportunities to deliver detailed carbon reduction projects for the DZ	Attach the following text to the action:  ensuring integrated environmental protection requirements are appropriately considered.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
6.5	Develop an enhanced smarter mobility strategy for the DZ to focus on increasing the use of electric modes of transport	<p>Attach the following text to the action:</p> <p>whilst advocating and exerting influence to support sustainability and environmental protection considerations being embedded into the project.</p>
6.11	Enhance the biodiversity value of the green and blue spaces within the DZ through nature-based solutions to provide additional ecosystem services such as carbon sequestration, amenity areas and clean water	<p>Attach the following text to the action:</p> <p>having due regard for planning and development policy and environmental protection considerations during the masterplanning and development process.</p>
6.13	Examine the potential of maximising district heating opportunities within the DZ and support the implementation of the recommendations of the report. Raise awareness of the opportunities and benefits presented by district heating.	<p>Attach the following text to the action:</p> <p>Appropriate regard shall be had to planning and environmental protection requirements when investigating and progressing any renewable energy initiatives supported by this action.</p>
6.15	Support the establishment of renewable energy projects, small, medium and large that will contribute to the overall goals of DZ.	<p>Attach the following text to the action:</p> <p>Promote - through control or influence as appropriate - project accordance with planning and environmental protection requirements.</p>



**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, the achievement of Water Framework Directive objectives, and the protection and maintenance of physical habitat and hydrological processes/regimes.</p>
<p>Promote climate action projects that support protected trees, hedgerows and other habitats such as wetlands, floodzones which contribute to green infrastructure.</p>
<p>Support opportunities to improve ecological connectivity of non-designated habitats and sites to improve overall ecosystem resilience and functioning while supporting climate action within the county.</p>
<p>Ensure 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

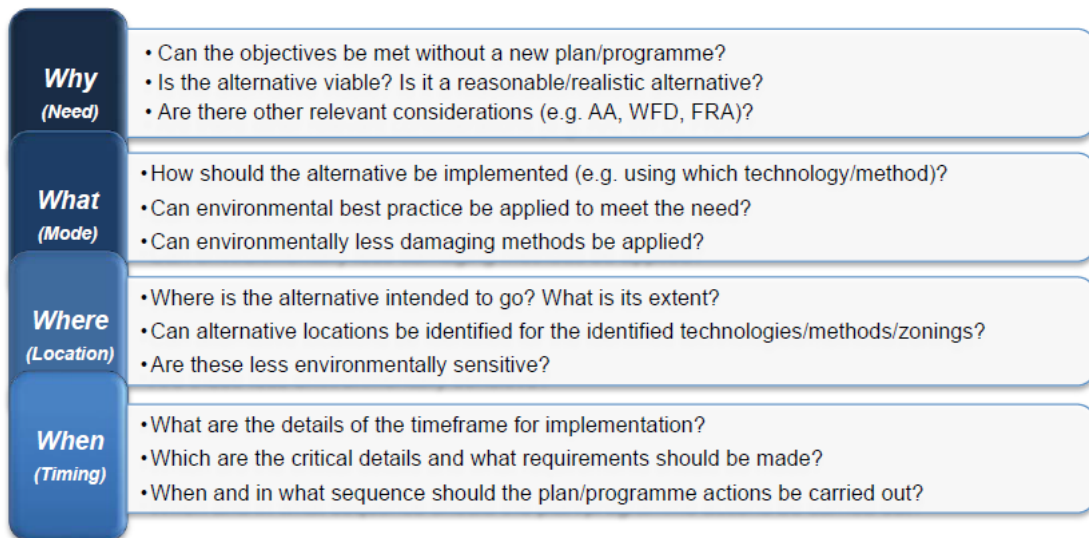
This section provides an overview of reasonable Plan alternatives considered during the plan-making processes. The environmental effects of reasonable alternative, including effects on biodiversity and European sites, were considered when choosing the preferred Plan.

### 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 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 Louth 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 Louth 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.

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



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

**[www.fehilytimoney.ie](http://www.fehilytimoney.ie)**

---

 **Cork**

 **Dublin**

 **Carlow**

