

CONSULTANTS IN ENGINEERING, ENVIRONMENTAL SCIENCE & PLANNING

## LOCAL AUTHORITY CLIMATE ACTION PLAN

# Appropriate Assessment Conclusion Statement

Prepared for: Monaghan County Council



Comhairle Contae Mhuineacháin Monaghan County Council

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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**

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



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#### 1.1 Background

This is the Appropriate Assessment (AA) Conclusion Statement for the Monaghan 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:



<sup>•</sup> Sufficient detail of the LACAP to make clear its size, scale and objectives.

<sup>•</sup> 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).

<sup>•</sup> Potential adverse impacts of the Plam on the relevant European sites.

<sup>•</sup> 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 - expressly 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:
BE 1	Improve the energy efficiency of Council buildings to help deliver carbon reduction targets, maximising the use of renewable energy sources where possible.	Improve the energy efficiency of Council buildings to help deliver carbon reduction targets, maximising the use of renewable energy sources where possible; having due regard to local human receptors, protected species, biodiversity, European sites and the need to appropriately conserve protected structures.
BE 2	Continue retrofitting council owned social housing to improve BER ratings.	Continue retrofitting council owned social housing to improve BER ratings; having due regard to local human receptors, protected species, biodiversity, European sites and the need to appropriately conserve protected structures.
BE 3	Ensure all new council buildings where possible are built to at least NZEB standards. Ensure all new council buildings where possible are built to at least NZEB standards; having due regar need to ensure renewable energy development supported by this action will not have any significant renvironmental effect.	
BE 7	Promote adaptive reuse of historic structures in the county e.g., retrofitting projects and using carbon budgets to demonstrate climate value. Promote adaptive reuse of historic structures in the county e.g., retrofitting pro to demonstrate climate value; having due regard to protected species, biodivined to appropriately conserve protected structures.	
BE 8	Increase housing stock units and reduce vacancy and dereliction by administering the vacant property refurbishment grant. (Croi Conaithe)	Increase housing stock units and reduce vacancy and dereliction by administering the vacant property refurbishment grant (Croi Conaithe); having due regard to protected species, biodiversity, European sites and the need to appropriately conserve protected structures.
BE 11	Migrate IT workload from council premises to council IT cloud.	Migrate IT workload from council premises to council IT cloud. Steps will be taken to ensure the cloud provider chosen has sustainability- and carbon-goals that align with the overall objective of this plan.
BE 14	Complete a Town Centre First Plan for all major towns within the county and implement recommendations.	Complete a Town Centre First Plan for all major towns within the county and implement recommendations. Having due regard to protected species, biodiversity, European sites and the need to appropriately conserve protected structures.
Т 2	Develop & implement a fleet decarbonisation roadmap as per guidelines within Local Authority Fleet – Strategy to Decarbonisation.	Develop & implement a fleet decarbonisation roadmap as per guidelines within Local Authority Fleet – Strategy to Decarbonisation, whilst ensuring energy/fuel used to power local authority alternative vehicles is sustainably sourced, and appropriate end-of-life management practices are in place for Electric Vehicles.
ТЗ	Expand pilot study on alternative "low carbon" pavement material for use on road network. Low Energy Bound Materials (LEBM) using Reclaimed Asphalt Pavement (RAP) Pilot Project.	Expand pilot study on alternative "low carbon" pavement material for use on road network; with a focus on implementation of the resulting recommendations. Low Energy Bound Materials (LEBM) using Reclaimed Asphalt Pavement (RAP) Pilot Project.

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Action Reference	Original Action	Recommendations integrated into the Plan, included in:
Τ4	Participate in Rehabilitation of roads over peat working group to determine most environmentally appropriate intervention techniques.	Participate in Rehabilitation of roads over peat working group to determine most environmentally appropriate intervention techniques, while ensuring rehabilitation projects have due regard to peat, water levels, flood risk, biodiversity and European sites.
Τ5	Develop an EV charging strategy and implementation plan to support the roll out of EV charging.	Develop an EV charging strategy and implementation plan to support the roll out of EV charging; having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites and local air quality.
Τ6	Provide shared council EV for staff to use for work related travel.	Provide shared council EV for staff use to use for work related travel; having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites and local air quality.
Τ7	Implement County Walking & Cycling Strategy (2021-2026)	Implement County Walking & Cycling Strategy (2021-2026); having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality, cultural heritage.
Т 8	Deliver active travel and greenway projects to achieve transport modal shift by encouraging cycling, walking, and running as an alternative to travel by car.	Deliver active travel and greenway projects to achieve transport modal shift by encouraging cycling, walking, and running as an alternative to travel by car; having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality.
T 10	Deliver Safe Route to School Programme to encourage students and staff, to engage in active travel.	Deliver Safe Route to School Programme to encourage students and staff, to engage in active travel; having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality, cultural heritage etc.
T 11	Protect and maintain active travel infrastructure in accordance with National Sustainable Mobility Policy.	Protect and maintain active travel infrastructure in accordance with National Sustainable Mobility Policy; having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality, and cultural heritage
T 12	Continue Internal and external engagement to promote modal shift to active travel.	Continue Internal and external engagement to promote modal shift to active travel; whilst advocating and exerting influence to ensure due regard is had to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality, and cultural heritage.
T 13	Examine feasibility of a Park and Stride system at different locations in towns across the county.	Examine feasibility of a Park and Stride system at different locations in towns across the county: ensuring such a study has appropriate regard to all relevant planning and environmental protection considerations.
T 15	Continue to complete National Catchment -based Flood Risk Assessment and Management (CFRAM) programme within Monaghan to ensure all current and future flood risks are identified.	Continue to complete National Catchment -based Flood Risk Assessment and Management (CFRAM) programme within Monaghan to ensure all current and future flood risks are identified with a focus on implementation of the resulting recommendations; having due regard to the need to promote nature based solutions and Sustainable Drainage Systems, and environmental sensitivities at these locations, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
Т 16	Resolve local flooding issues utilising OPW and Department of transport funding. (Climate Adaptation & Resilience works, OPW Minor works scheme.)	Resolve local flooding issues utilising OPW and Department of transport funding. (Climate Adaptation & Resilience works, OPW Minor works scheme.); having due regard to the need to promote nature-based solutions and Sustainable Drainage Systems, and environmental sensitivities at these locations, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.
T 17	Maintain transport network to take account of risk of surface water floods.	Maintain transport network to take account of risk of surface water floods; having due regard to the need to protect the environment, including European site and Biodiversity during the carrying out of maintenance works.
T 18	Develop and implement a Sustainable Drainage Strategy for the county.	Develop and implement a Sustainable Drainage Strategy for the county; having due regard to the need to promote nature-based solutions and Sustainable Drainage Systems, and environmental sensitivities, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.
Т 19	Advocate for and support the reconnection of rail services to the county in accordance with The All-Island Strategic Rail Review. (AISRR)	Advocate for and support the reconnection of rail services to the county in accordance with The All-Island Strategic Rail Review. (AISRR); whilst advocating and exerting influence to ensure due regard is had to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality, and cultural heritage.
NEGI 1	Develop a Green Infrastructure Plan at county and major urban area level, incorporating ecology, climate change mitigation and adaptation, to increase climate resilience, deliver a wide range of ecosystem services, while also enhancing biodiversity.	Develop a Green Infrastructure Plan at county and major urban area level, incorporating ecology, climate change mitigation and adaptation, and environmental protection considerations, to increase climate resilience, deliver a wide range of ecosystem services, while also enhancing biodiversity.
NEGI 2	Develop a Tree and Woodland Plan to increase tree cover on Council-owned land, using appropriate species to store carbon, support nature, improve soils and water quality, and aid flood protection and urban design. Aim to increase areas of public land under forestry through schemes such as "Forest Creation on Public Lands".	Develop a Tree and Woodland Plan to increase tree cover on Council-owned land, using appropriate native species to store carbon, support nature, improve soils and water quality, and aid flood protection and urban design. Aim to increase areas of public land under forestry through schemes such as "Forest Creation on Public Lands".
NEGI 4	Develop and implement a pesticide reduction policy for Monaghan County Council, using Monaghan Municipal Districts pilot programme of significantly reduced use of glyphosate and trials of scuffing machine, to meet or exceed Irelands target of 50% reduction by 2030.	Develop and implement a pesticide reduction policy for Monaghan County Council, using Monaghan Municipal Districts pilot programme of significantly reduced use of glyphosate and trials of scuffing machine, to meet or exceed Irelands target of 50% reduction by 2030; whilst 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.

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Action Reference	Original Action	Recommendations integrated into the Plan, included in:
NEGI 5	<ul> <li>Expand the sustainable management of 'taken in-charge' areas and the public realm, parks &amp; green spaces by:</li> <li>Increasing areas managed as meadow/wildflowers.</li> <li>Planting pollinator friendly trees and shrubs in accordance with the national pollinator plan.</li> <li>Supporting community groups to carryout related projects.</li> <li>Decarbonise machinery used to manage areas within the public realm, parks and green spaces when feasible and practical to do so. Subject to cost expand the use of low impact fuel where appropriate.</li> </ul>	<ul> <li>Expand the sustainable management of 'taken in-charge' areas and the public realm, parks &amp; green spaces by:</li> <li>Increasing areas managed as meadow/wildflowers.</li> <li>Planting pollinator friendly native trees and shrubs in accordance with the national pollinator plan.</li> <li>Supporting community groups to carryout related projects.</li> <li>Decarbonise machinery used to manage areas within the public realm, parks and green spaces when feasible and practical to do so. Subject to cost expand the use of low impact fuel where appropriate.</li> </ul>
NEGI 9	Develop and implement a Heritage Plan to record, conserve, and raise awareness of all aspects of built, natural and cultural heritage in the County.	Develop and implement a Heritage Plan to record, conserve, and raise awareness of all aspects of built, natural and cultural heritage in the County, having due regard to the need to appropriately protect, conserve and enhance important habitats and species and European sites, support the maintenance and improvement of water quality in line with the aims of the Water Framework Directive, and conserve protected structures.
CRT 8	Support the development and ongoing work of Sustainable Energy Communities (SECs).	Support the development and ongoing work of Sustainable Energy Communities (SECs), whilst advocating and exerting influence to ensure supported development does not contravene relevant environmental protection criteria or cause significant negative environmental effects.
CRT 10	Use the Green Efficiency Grant to empower businesses to implement green technology solutions.	Use the Green Efficiency Grant to empower businesses to implement green technology solutions, whilst advocating and exerting influence to ensure supported renewable energy development does not contravene relevant environmental protection criteria or cause significant negative environmental effects.
SRM 3	Support the development of biomethane potential within the county to generate sustainable energy and reduce the impact of organic manures on the environment.	Support the development of biomethane potential within the county to generate sustainable energy and reduce the impact of organic manures on the environment, whilst advocating and exerting influence to ensure anaerobic digestion related development and activities promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.
SRM 6	Expand composting facilities to all Council depots to deal with green waste arising from Council operations.	Expand composting facilities to all Council depots to deal with green waste arising from Council operations; ensuring such facilities continue to operate in accordance with best practice and the provisions of the Waste Management Act, and do not cause negative environmental effects.
SRM 7	Install rainwater harvesting facilities in all Council depots as appropriate, to reduce demand on mains network and reduce use of treated water.	Install rainwater harvesting facilities in all Council depots as appropriate, to reduce demand on mains network and reduce use of treated water. Ensure due regard is given to the need to environmental sensitivities, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
SRM 8	Promote upgrading of existing watermain networks by group water schemes to minimize leakage of treated water.	Promote upgrading of existing watermain networks by group water schemes to minimize leakage of treated water. Ensure due regard is given to the need to environmental sensitivities, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology.
SRM 12	Progress the authorisation and subsequent of remediation of historical landfill sites previously controlled by Monaghan County Council.	Progress the authorisation and subsequent of remediation of historical landfill sites previously controlled by Monaghan County Council. Ensure the works have appropriate regard to planning, waste management and environmental requirements, considerations and constraints.
DZ BE1	Retrofit all social housing and local authority buildings in the Monaghan Town DZ to achieve a minimum Building Energy Rating of B2. Retrofit all social housing and local authority buildings in the Monaghan Town DZ to achieve a Building Energy Rating of B2, having due regard to local human receptors, protected species, b	
DZ BE2	Assess the feasibility and install rooftop solar PV on social housing and local authority property across the Monaghan Town DZ Assess the feasibility and install rooftop solar PV on social housing and local authority property across the Monaghan Town DZ Assess the feasibility and install rooftop solar PV on social housing and local authority property, sites and the need to appropriately conserve protected structures.	
DZ BE3	Promote retrofit to Building Energy Rating B2 for private and commercial properties across the Monaghan Town DZ Promote retrofit to Building Energy Rating B2 for private and commercial properties across the Monaghan Town DZ having due regard to local human receptors, protected species, biodiv the need to appropriately conserve protected structures.	
DZ BE6	Promote the use of nature based solutions (NBS) to reduce the impact of flooding where possible	Promote the use of nature based solutions (NBS) to reduce the impact of flooding where possible, having due regard to environmental sensitivities including sensitive human receptors, water quality, biodiversity, European sites, riparian corridors and aquatic ecology.
DZ BE8	Undertake a feasibility study of the potential for district heating for Monaghan Town.	Undertake a feasibility study of the potential for district heating for Monaghan Town, whilst advocating and exerting influence to ensure that all associated development has due regard to the need to protect sensitive aspects of the receiving environment, such as water bodies, biodiversity, flora and fauna, European sites, and local population.
DZ BE9	Complete a Town Centre First Plan for Monaghan town and implement recommendations.	Complete a Town Centre First Plan for Monaghan town and implement recommendations. Having due regard to protected species, biodiversity, European sites and the need to appropriately conserve protected structures.
DZ T1	Implement the decarbonisation of the Local Authority vehicular fleet as appropriate	Implement the decarbonisation of the Local Authority vehicular fleet as appropriate, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites and local air quality.
DZ T6	Identify suitable locations for EV charging points across the Monaghan Town DZ	Identify suitable locations for EV charging points across the Monaghan Town DZ, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites and local air quality.



Action Reference	Original Action	Recommendations integrated into the Plan, included in:
DZ T8	Engage with the relevant authorities to support the electrification of Local Link,.	Engage with the relevant authorities to support the electrification of Local Link, whilst advocating and exerting influence to ensure sustainability and environmental protection considerations are embedded into the project.
DZ T10	Increase pedestrianised space in Monaghan Town Increase pedestrianised space in Monaghan Town, having appropriate regard to environmental sens such as traffic and transport constraints and aspects, the receiving water environment, biodiversity, Eu sites, local air quality and cultural heritage.	
DZ T17	Promote and support the Safe Routes to School Programme to encourage staff and students in primary and post-primary schools within the DZ to walk and cycle. Promote and support the Safe Routes to School Programme to encourage staff and students in pri- post-primary schools within the DZ to walk and cycle. Promote and support the Safe Routes to School Programme to encourage staff and students in pri- post-primary schools within the DZ to walk and cycle.	
DZ NGI1	Develop a green infrastructure masterplan for Monaghan Town to coordinate planning for the enhancement of the natural environment and to connect public green space and greenways within the DZ	Develop a green infrastructure masterplan for Monaghan Town to coordinate planning for the enhancement of the natural environment and to connect public green space and greenways within the DZ, having due regard for environmental protection considerations and opportunities for climate action co-benefits.
DZ NGI4	Support green infrastructure and nature based solutions such as sustainable urban drainage systems to improve climate resilience	Support green infrastructure and nature based solutions such as sustainable urban drainage systems to improve climate resilience, 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 NGI5	Promote rain-water harvesting, reuse of grey water and green roofs and walls.	Promote rain-water harvesting, reuse of grey water and green roofs and walls, having due regard to environmental sensitivities including water quality, biodiversity, European sites, visual amenity and recreation and amenity value.

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

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.

Support or facilitate climate action related projects and initiatives which seek to make improvements in soil structure, management and health by increasing soil organic carbon - which will create the environmental co-benefits of improving flood resilience by enhancing water holding capacity of soils and increasing the level of GHG sequestration associated with land use functions.

Ensure 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 significant negative effects on the receiving environment shall be supported.

Flood 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.

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.

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.

Promote climate action projects that support protected trees, hedgerows and other habitats such as wetlands, flood zones which contribute to green infrastructure.

Support opportunities to improve ecological connectivity of non-designated habitats and sites to improve overall ecosystem resilience and functioning while supporting climate action within the county.

Ensure all projects supported by the council have taken the necessary precautions to identify and manage invasives species, particularly with regard to Schedule III species. No climate action related development project that is likely to cause the spread of invasives species listed in Schedule III shall be supported.



#### 3.1 Introduction

This section provides an over 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:

- 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 LACAP 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.



Why (Need)	<ul> <li>Can the objectives be met without a new plan/programme?</li> <li>Is the alternative viable? Is it a reasonable/realistic alternative?</li> <li>Are there other relevant considerations (e.g. AA, WFD, FRA)?</li> </ul>
What (Mode)	<ul> <li>How should the alternative be implemented (e.g. using which technology/method)?</li> <li>Can environmental best practice be applied to meet the need?</li> <li>Can environmentally less damaging methods be applied?</li> </ul>
Where (Location)	<ul> <li>Where is the alternative intended to go? What is its extent?</li> <li>Can alternative locations be identified for the identified technologies/methods/zonings?</li> <li>Are these less environmentally sensitive?</li> </ul>
When (Timing)	<ul> <li>What are the details of the timeframe for implementation?</li> <li>Which are the critical details and what requirements should be made?</li> <li>When and in what sequence should the plan/programme actions be carried out?</li> </ul>

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

#### 3.3 Identification and Description of Reasonable Alternatives

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

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



#### Table 3-1:Reasonable Alternatives to the LACAP

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



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

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

Alternative 1 - The Pareto Approach - would of lead to some positive environmental effects and would of 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 planmaking 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 Monaghan 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 Monaghan 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











