National Road Network EV Charging Plan (NRNEVCP) 2024-2030, formerly named National En-Route EV Charging Network Plan (NEEVCNP)

Natura Impact Statement (NIS)

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Contents

Tables

Figures

Appendices

1. Introduction

1.1 Overview

This report contains an Appropriate Assessment Screening (Stage 1) and Habitats Directive Appropriate Assessment (AA) Natura Impact Statement (NIS) (Stage 2) for the National Road Network EV Charging Plan (the 'Plan'). Both have been prepared by Arup as part of the Sustainability Portfolio Services Framework by Transport Infrastructure Ireland (TII). It assesses the potential for the Plan, being prepared by Zero Emission Vehicles Ireland (ZEVI), firstly to result in likely significant effects on any European site and secondly, any residual effects arising after the inclusion of mitigation, to adversely affect the integrity of any European site within the Natura 2000 network (hereafter referred to as European site(s))[1].

The Plan provides a pathway for delivery of electric vehicle (EV) en-route charging infrastructure in Ireland, in line with both national and European climate targets for a cleaner transportation sector. This pathway has examined a set of commitments on investment, regulation and policy instruments required over the coming years to remove barriers to the adoption of passenger cars, light duty vehicles (LDVs) and heavy good vehicles (HGVs).

1.2 Report Aim

The purpose of this report is to inform the relevant Public Authority of the potential for likely significant effects (LSE), and subsequently, any potential for adverse impacts on the integrity of European sites arising from the Plan followed by the recommendation of mitigation, where required, to avoid any potential adverse effects.

In preparing this NIS, a multi-stage approach has been taken. The purpose of this staged approach has been to align the AA process with the requirements of the Strategic Environmental Assessment (SEA) Directive (2001/42/EC)[2] process which is also required to support the development of the Plan. Article 3.2 (b) of the SEA Directive expressly links to assessments pursuant to Article 6 of Directive 92/43/EEC. The preparation of the SEA and AA reporting comprises an integrated approach, such as sharing of baseline data, mapping of European sites and sharing of potential ecological effects of the Plan on European sites.

Where, following the period of public consultation, changes are made to the Plan, these changes will be assessed as necessary and documented as supplementary material to this NIS.

1.3 Legislative Context of the Natura Impact Statement (NIS)

The preparation of the NIS has had regard to Article 6 of the Council Directive 92/43/EEC of 21 May 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora (as amended) (hereafter referred to as the Habitats Directive). The Habitats Directive has been transposed in Ireland by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011) (as amended), and by Part XAB of the Planning and Development Act, 2000 (as amended). In the context of the Plan, the governing legislation is principally the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No 477/2011).

[1] Appropriate assessment comes from the Habitats Directive (92/43/EEC), which seeks to safeguard the long-term survival of Europe's most valuable and threatened species and habitats. The geographical areas of particular importance to these species and habitats have been selected as Special Areas of Conservation (SAC) and Special Protection Areas (SPA) which are collectively referred to (in Ireland) as European Site (s). Together, these sites comprise the pan-European Natura 2000 network of protected areas.

[2] Official Journal of the European Communities, Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment.

Under these Regulations, prior to submitting (to the public authority[3]) for approval[4] a plan[5] that is not directly connected with or necessary to the management of either a SPA or SAC, public authorities are required to consider whether the plan may have a significant effect on such a site; and where this is the case, the public authority is required to ascertain if the plan would give rise to adverse effects on the integrity of a European site(s).

1.4 Screening for Appropriate Assessment

The Plan underwent a screening for AA, attached in Appendix B[6].

The key results of the AA Screening undertaken on the Plan and its 35 Proposals are:

- Any potential for Likely significant effects (LSE) on European sites were excluded for **16 Proposals**.
- LSE on European sites could not be ruled out for **19 Proposals** (see Appendix B). This is a result of the nature of developments that could arise from implementation of the Plan. It should be noted that this view is based on a worst-case scenario, whereby certain Plan Proposals may enable development to be located close to, within or connected to European sites, or increase the risk of that occurring.

1.5 Statements of Authority

Statements of Authority for authors and reviewers of this report are included in Appendix A.

1.6 Consultation Responses

A Strategic Environmental Assessment (SEA) Scoping Report was prepared in June 2023[7] and issued to statutory consultees for consultation. Scoping responses were received after a four week consultation period and are included in the SEA Environmental Report[8] in full.

The National Parks and Wildlife Service did not respond to requests for consultation and recommendations put forward by the EPA have been incorporated into the SEA or are currently being considered by ZEVI. Specific recommendations from the EPA in relation to the habitat directive included recommendation that where relevant and appropriate, the requirements of the SEA and Habitats directives should be considered.

The Natural Environment Division of the Department of Agriculture, Environment and Rural Affairs (DAERA) in Northern Ireland submitted a response noting that potential adverse impacts of the Plan on European sites in Northern Ireland should be considered. Section 4.1 notes that, given the scale and nature of the potential developments arising from the implementation of the Plan, it was determined that there were no pathways for effects to European sites in Northern Ireland.

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[3] Public Authority as defined by the Birds and Natural Habitats Regulations 2011 as amended (SI 477/2011) : "Public authority" means … (a) Department of Transport.

[4] Approval of a plan falls under the realm of 'consent' as defined within the Birds and Natural Habitats Regulations 2011 as amended (SI 477/2011): "consent" includes any licence, permission, permit, derogation, dispensation, approval or other such authorisation granted by or on behalf of a public authority, relating to any activity, plan or project that may affect a European Site, and includes the process of adoption by a public authority of its own land use plans or projects; "

[5] 'Plan' as defined by the Birds and Natural Habitats Regulations 2011 as amended (SI 477.2011): subject to the exclusion, except where the contrary intention appears, of any plan that is a land use plan within the meaning of the Planning Acts 2000 to 2011, includes— (a) any plan, programme or scheme, statutory or non-statutory, that establishes public policy in relation to land use and infrastructural development in one or more specified locations or regions, including any development of land or on land, the extraction or exploitation of mineral resources or of renewable energy resources and the carrying out of land use activities, that is to be considered for adoption or authorisation or approval or for the grant of a licence, consent, permission, permit, derogation or other authorisation by a public authority, or (b) a proposal to amend or extend a plan or scheme referred to in subparagraph (a)

[6] Arup (16 June 2023) Appropriate Assessment Screening Report for the National Road Network EV Charging Plan

[7] Arup (2023) National Road Network EV Charging Plan SEA Scoping Report

[8] Arup (2024) National Road Network EV Charging Plan SEA Environmental Report

2. National Road Network EV Charging Plan – Overview

2.1 Introduction

Ireland has recognised that EVs represent a key component of reducing carbon emissions within the transport sector. In response to the widespread adoption of EVs in Ireland, a comprehensive charging infrastructure network that is accessible, reliable and convenient for all drivers is required to accommodate 30% of the private car fleet to be electrified by 2030.

As of 2023, there is an existing network of publicly accessible EV charging stations of over 2,100 public charging points across the country. The deployment of en-route charging infrastructure requires consideration of charging station locations, available electricity grid capacity, suitable service operation business models and the level of funding required to support deployment, especially in remote areas. In March 2023, the European Commission drafted the Alternative Fuels Infrastructure Regulation (AFIR) which establishes technical and operational requirements for EV charging infrastructure. These include mandatory deployment targets along the Trans-European Transport Network (TEN-T), the need for interoperability between different charging networks, accessibility for all users, and information provision for users on the availability and location of charging infrastructure. Some specific requirements involve:

- Having charging pools of 600kW for LDVs at 60km intervals in both directions by 2035; and
- Dedicated charging pools for HDVs of 3,600kW at 60km intervals in both directions on the core network and 1,500kW at 60km in both directions on the comprehensive network by 2030.

The Plan establishes the framework to satisfy the objectives of the AFIR and deliver the necessary en-route infrastructure for Ireland to meet the decarbonisation targets laid out in the Climate Action Plan (CAP) 2024. In drawing on lessons from international experience, the Plan encompasses the best practices whilst avoiding pitfalls to deliver efficient and effective implementation. This exercise allowed ZEVI to establish a coordinated approach with relevant stakeholders including state agencies, local authorities, road users, public transport providers and the freight and logistics sector, service area and charge point operators, ESBN and EirGrid to set clear targets to deliver a future-proofed network of high-power EV charging infrastructure.

However, to fully understand the requirements of implementing the Plan, an overview of the existing National Road Network and the electric mobility market in Ireland is provided. The TEN-T road network in Ireland consists of several categories of roads including motorways, dual carriageways and other primary roads totalling 500km of Core network and 1,700km of comprehensive network. Refer to Figure 1 for an overview of the TEN-T road network in Ireland. At the end of 2022, there were approximately 73,576 total electric vehicles in Ireland which represented a 57% increase from the previous year. Currently, the majority of EV charging points have the capacity to charge an EV to 80% in 20-30 minutes and are strategically located in service areas on motorways or on the major national road network. Figure 2 shows the current EV charging network in Ireland.

To facilitate the implementation of the required infrastructure, different modelling methodologies and scenario analysis were undertaken to inform the Plan. These assessments, together with the AFIR requirements provide key insights to accelerate the delivery of en-route charging infrastructure.

Figure 1 Ireland's National Road Network | Source: National Road Network EV Charging Plan 2024-2030, Figure 16.

Figure 2 Current EV charging infrastructure on the National Road Network | Source: National Road Network EV Charging Plan 2024-2030, Figure 6

2.2 Plan Proposals

The modelling methodologies and scenario analysis informed the development of a set of principles, support options and indirect measures necessary for the implementation of the Plan. Within the Plan a total of 35 sections of text have been identified by the AA team which could be considered Proposals arising from the Plan. These are not necessarily clearly identified within the Plan as a discrete set of Proposals; however, the AA team has considered that AA screening is required on these 35 "Proposals" as all other material in the plan is either introductory, expositional in nature or is non-relevant technical detail such as modelling and analysis of need. These Proposals are given sequential numbering in this report, but this is solely for the purposes of this assessment.

2.3 Timeframe

The timeframe of the Plan covers the period from 2024 to 2030 to facilitate the delivery of the necessary infrastructure to support the uptake of EVs in Ireland. The Plan provides three alternative scenarios to guide development of the EV charging network in Ireland to 2025 and 2030 to comply with Ireland's transportation decarbonisation targets.

2.4 Future en-route Charging Network

As noted in Section 2.1, there are specific requirements for the EV charging network that must be in place before 2035 including:

- Having charging pools of 600kW for LDVs at 60km intervals in both directions by 2035; and
- Dedicated charging pools for HDVs of 3600kW at 60km intervals in both directions on the core network and 1500kW at 60km in both directions on the comprehensive network by 2030.

The Proposals listed in Section 5 are intended to facilitate the development of the EV network to satisfy these objectives within the timeline of the Plan.

3. Approach to Appropriate Assessment Process

3.1 Introduction

This section provides details on the methodology followed including sources of guidance, legislation and information gathered to inform the preparation of this report. Any relevant guidance and data sources which were referenced during the preparation of this report are listed below.

3.2 Guidance and Data Sources

This document has been prepared with regard to the following guidance documents:

- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (Department of Environment, Heritage and Local Government, 2010 revision)
- Appropriate Assessment under Article 6 of the Habitats Directive; Guidance for Planning Authorities. Circular National Parks and Wildlife Service (NPWS) 1/10 and PSSP 2/10
- Assessment of Plans and Projects Significantly Affecting Natura 2000 sites: Methodical Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission Environment Directorate-General, 20214)
- Communication from the Commission on the precautionary principle. European Commission (2000)
- Guidance Document on Article 6(4) of the Habitats Directive 92/43/EEC (European Commission, 2007)

- Guidelines for Good Practice Appropriate Assessment of Plans under Article 6(3) Habitats Directive (International Workshop on Assessment of Plans under the Habitats Directive, 2011)
- Managing Natura 2000 Sites: The Provision of Article 6 of the Habitats Directive 92/43/EEC (EC Environment Directorate-General, 2018); [hereafter referred to as MN 2018]
- Office of the Planning Regulator Practice Note PN01 - Appropriate Assessment Screening for Development Management (OPR, 2021)
- The Status of EU Protected Habitats and Species in Ireland. Volume 1: Summary Overview. Unpublished NPWS report. NPWS (2019)
- The Status of EU Protected Habitats and Species in Ireland. Volume 2: Habitat Assessments. Unpublished NPWS report. Edited by: Deirdre Lynn and Fionnuala O'Neil. NPWS (2019) and
- The Status of EU Protected Habitats and Species in Ireland. Volume 3: Species Assessments. Unpublished NPWS report (2019). Edited by: Deirdre Lynn and Fionnuala O'Neill (2020)
- Environmental Protection Agency - Ireland's Environment. An Integrated Assessment 2020 Article 12 web tool. Species trends at Member State Level. Legislative Background.

In addition, the ecological data reviewed to inform this document comprises:

- National Parks and Wildlife Service (NPWS) Designations web viewer[9]
- Geospatial data on protected sites[10]
- EU pressures and threats information[11] and
- Conservation objectives[12].

The requirements for screening for AA and AA of implications for European sites, are set out in Regulation 42 of the European Communities (Birds and Natural Habitats) regulations, 2011 (S.I. 477 of 2011). AA is a process required under Article 6(3) of the EU Habitats Directive as transposed by the abovementioned Regulation.

All plans and projects which are not directly connected with or necessary to the management of a European site, but which either individually or in combination with other plans or projects, are likely to have a significant effect on "a European site", require an AA of these effects to determine if they will adversely affect the integrity of these sites.

The AA screening process scrutinises the plan or project to determine if there are likely significant effects either individually or in combination with other plans or projects, on a European site. European sites are part of the Natura 2000 network and include those designated as Special Areas of Conservation (SAC), Candidate SACs or Special Protection Areas (SPA). This AA Screening (included in Appendix B) and Stage 2 AA describes the outcome of this analysis in respect of the Plan.

SACs are selected for the conservation of Annex I habitats (including priority types which are in danger of disappearance) and Annex II species (other than birds). SPAs are selected for the conservation of Annex I birds and all migratory birds and their habitats. The Annex habitats and species, for which each site is selected, are termed the Qualifying Interests (QIs) for SACs and termed Special Conservation Interests (SCI) for SPAs of each site. Conservation Objectives for the site are defined for these QIs and SCIs.

[9] https://dahg.maps.arcgis.com/apps/webappviewer/index.html?id=8f7060450de3485fa1c1085536d477ba accessed 03 July 2023.

[10] NPWS Protected Sites Data. Accessed at https://www.npws.ie/maps-and-data/designated-site-data on 03 July 2023.

[11] European Environment Agency. Central Data Repository – Reference portal for reporting under Article 17 of the Habitats Directive - List of pressures and threats with specific guidance on the use of distinct pressure and measure codes. Accessed at: https://cdr.eionet.europa.eu/help/habitats_art17 on 03 July 2023.

[12] NPWS (2023) Conservation Objectives. Accessed at https://www.npws.ie/protected-sites/conservation-management-planning/conservation objectives on 03 July 2023

A key requirement of the Habitats Directive is that the effects of any plan or project, which is not directly connected with or necessary to the management of a European site, but which alone, or in combination with, other plans or projects, are likely to have a significant effect on a European site, should be assessed before any decision is made to allow that plan or project to proceed. The obligation to undertake a screening for AA, and if necessary, an AA, derives from Article 6(3) of the Habitats Directive (92/43/EEC) and both involve a number of steps and tests that need to be applied in sequential order.

Article 6(3) is concerned with the strict protection of sites, while Article 6(4) is the procedure for allowing derogation from this strict protection in certain restricted circumstances.

Article 6(3) of the Habitats Directive states:

"Any plan or project not directly connected with, or necessary to, the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only having ascertained that it will not adversely affect the integrity of the site concerned and if appropriate, after having obtained the opinion of the general public".

The public authority is required to carry out a screening for AA, and if necessary, an AA, as per Article 6(3) of the Habitats Directive. If the public authority determines that the plan or project will adversely affect the integrity of a European site, it may only authorise that plan or project by following the Article 6(4) procedure. The Article 6(3) procedure is outlined in Stage 1 and 2 below:

Stage 1 – Screening for Appropriate Assessment – to assess, in view of best scientific knowledge, if the project or plan, individually or in combination with another plan or project is likely to have a significant effect on the Natura 2000 site.

Stage 2 – Appropriate Assessment – This is required if it cannot be excluded, on the basis of objective information, that the project or plan, individually or in combination with other plans or projects, will have a significant effect on a Natura 2000 site. The AA must include a final determination by the public authority as to whether or not a proposed project would adversely affect the integrity of a Natura 2000 site. In order to reach a final determination, the public authority must undertake examination, analysis and evaluation, followed by findings, conclusions and a final determination. The appropriate assessment must contain complete, precise and definitive findings and conclusions, and may not have lacunae or gaps.

The Article 6(4) procedure it outlined below:

"If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.

Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission to other imperative reasons of overriding public interest."

Stage 3 – Assessment of alternative solutions – the process which examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site.

Stage 4 – Assessment where no alternative solutions exist and where adverse impacts remain – an assessment of compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed.

3.3 Methodology

In order to comply with the requirements of Article 6(3) of the EU Habitats Directive, the process of Screening for AA was undertaken at an early stage in the draft of the Plan (see Section 1.4 and Appendix B). The AA Screening has assessed the potential for the Plan to result in likely significant effects on any European sites within the Natura 2000 network, either alone or in combination with other plans and projects.

In order to provide a focus for the overall AA process all qualifying features of European sites were reviewed for the potential for likely significant effects arising from the implementation of the Plan.

Any aspects of the Plan determined as having the potential for likely significant effects on European sites and/or their qualifying features, required further full AA within Stage 2 of the process.

In line with the relevant guidance and case law, this stage of the AA consists of the three main steps, many of which are iterative in nature:

- **Impact Prediction** – identification of the aspects of the Plan Proposals likely to affect the conservation objectives of European sites. A source-pathway-receptor model has been used to identify the Zone of Influence (ZoI) (see Section 3.3.1) and assess potential for adverse effects (see Section 3.3.2)
- **Assessment of Effects** – assessment as to whether the Plan Proposals are likely to result in significant effects on the integrity of European sites. This requires understanding of relevant QIs/SCIs and associated conservation objectives (see Section 3.3.2.1) and
- **Mitigation Measures** – Mitigation measures are identified to ameliorate any adverse effects on the integrity of any European site.

3.3.1 Impact Prediction

The Zone of Influence (ZoI) is the geographical area over with the Plan Proposals could affect the receiving environment in a way that could have a significant effect on the QIs/SCIs of a SAC or SPA. The ZoI is established using the **Source-Pathway-Receptor** framework and takes into consideration the national scale of the Plan. The **source** relates to the Proposals described within the Plan which have the potential to adversely impact European sites (i.e., land-use changes). The **pathways** relate to how the implementation of the Plan Proposals can potentially impact European sites (i.e., disturbance to species or impacts to water quality). The **receptor** is the European site network across Ireland.

Details on the ZoI are provided in Section 4.

3.3.2 Assessment of Effects

3.3.2.1 Understanding Qualifying Interests and Conservation Objectives

As a first step, analysis of the QIs/SCIs on a site-by-site basis was attempted. It was found that given the national scale of the Plan and its Proposals, and the widespread nature of European Sites throughout Ireland, there exists the potential for adverse effects on the integrity of much of the European Site network in Ireland. Given the high-level nature of the source and pathways, assessment of transport related impacts across up to 8 pathways for effect on each QI/SCI of every European Site within Ireland, is considered a task which would not benefit the AA process and could potentially obfuscate the process.

As a second step, in an attempt to provide a useful scientific analysis of all European sites in Ireland, an attempt was made to summarise sites by grouping them by their QIs/SCIs (154 different QI/SCIs in Ireland) and use the Article 17 reporting to evaluate which of these QI/SCIs were subject to transport related pressures and threats as identified by the Article 17 Reporting.

The most recent Article 17 reporting for Ireland was published in 2019 for the period 2013-2018[13].

[13] NPWS Article 17 Reports Article 17 Reports | National Parks & Wildlife Service (npws.ie) (last accessed 03 July 2023)

A summary of the main pressures and threats to both habitats and species is provided online on the European Environment Agency[14]. However, because the way the EU pressure and threat codes have been grouped/themed, and the nature of the Plan Proposals, it was not possible to isolate by way of the QI/SCIs, whether each of these was sensitive to pressures/threats arising from changes in transport infrastructures.

A lack of geographic specificity exists for the potential future en-route EV charging network. To establish potential likely significant effects on a European site/QI without having a clear indication of the specific sites or geographic locations of EV charging infrastructure could mislead the AA process. Therefore, the approach adopted within this AA examines the potential for adverse effects on the integrity of European sites in general rather than applying a site-specific approach.

3.3.2.2 Assessment of Effects of the Plan Proposals

Guidance documents (see Section 3.2) provide proposed criteria to determine if a proposal is likely to have significant effects. These criteria are particular suited to appropriate assessment of individual projects, as detail on the receiving environment will be available for analysis when project locations are known.

It is not possible to determine adverse effects on the integrity of European sites at the site-specific level as the Plan Proposals are set at a national scale. There is a high-level map (Figure 1) which provides an overview of the core road networks within Ireland which are to be targeted in the initial phases of the Plan. However, precise details of locations where the Proposals and details of the work required at these locations are not available.

Potential for adverse effects on the integrity of European sites, without mitigation, exists for 25 of the Plan's Proposals. This AA outlines the relevant measures which have been recommended to be included in the Plan to mitigate any anticipated adverse effects, and provides an assessment of whether, with such mitigation, the Plan Proposals have the potential to result in adverse effects on the integrity of European sites.

The threshold for a LSE is treated as being above a *de minimis* level[15]. The opinion of the Advocate General in CJEU case C-258/11 outlines:

"The requirement that the effect in question be significant exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on a European site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill".

3.3.2.3 In-Combination Assessment of Effects

When considering in-combination effects, plans, programmes and policies relevant to the scale of the Plan have been considered.

Appendix B contains a full list of the plans, programmed and policies considered in this AA.

An assessment of effects is provided in Section 5.

[14] European Environment Agency Article 17 National Summary Dashboards, Main pressures and threats. Accessed at https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu/article-17-national-summary-dashboards-archived/main-pressures-and-threats in July 2023

[15] Sweetman v. An Bord Pleanála (Court of Justice of the EU, case C-285/11). A de minimis effect is a level of risk that is too small to be concerned with when considering ecological requirements of an Annex I habitat or a population of Annex II species present on a European site necessary to ensure their favourable conservation condition. If low level effects on habitats or individuals of species are judged to be in this order of magnitude and that judgment has been made in the absence of reasonable scientific doubt, then those effects are not considered to be likely significant effects

4. Identifying the Zone of Influence

4.1 Overview

The ZoI is considered to be the entire country of Ireland, given that:

- The **source** is the 19 Proposals (see Appendix B) which have the potential to adversely impact the European sites and cover the majority of the country (See Section 4.2)
- There are eight key types of **pathway** for effect on European sites (see Section 4.3) and
- The **receptor** is the European site network across Ireland comprising 165 SPAs, one candidate SPA and 441 SACs in (see Section 4.4).

Given the scale and nature of the potential developments arising from the implementation of the Plan, it was considered that there were no pathways for effects to European sites in Northern Ireland.

4.2 Source: Plan Proposals

The Proposals which provide a route to achieving the Plan have a national scale of application and are targeted at facilitating a shift to low-carbon transportation alternatives across Ireland. This requires the expansion of the existing charging infrastructure network through the deployment of en-route charging infrastructure to accommodate the projected uptake of EVs in Ireland.

No new developments would take place as a direct result of the Plan's Proposals, however, the location, design, scale and form of development throughout Ireland may be influenced by Proposals presented in the Plan. Given the national scale of Plan, there exists the potential for likely significant effects on much of the Natura 2000 network which comprises of 441 SACs, 165 SPAs and one candidate SPA.

19 of the 35 Plan Proposals have the potential to result in likely significant effects on European sites, as these Proposals could result in the upgrade of existing infrastructure (See Figure 2) or construction of new infrastructure which may be in proximity to or connected to a European site.

4.3 Pathway: Potential Pathways for Effect

Key potential pathways for effect on European sites may comprise (but are not restricted to):

- **Direct land take** – a reduction in habitat for which the European site is designated, or habitat that supports faunal species for which the European site is designated. The reduction in habitat area may also lead to fragmentation (resulting in an increase in edge effects or susceptibility of habitats to damage); habitat isolation; and severance (which may impact life cycles of species e.g. aquatic habitat of fish being severed or impacts on plant dispersal);
- **Hydrological Changes** – an increase or decrease in water entering European sites/changes in groundwater level has potential to impact vegetation communities. This could result in loss of important plant species and impacts on fauna reliant on specific plants or vegetation communities. Furthermore, the sites may become more prone to the effects of drought or flooding events. Changes to hydrology within watercourses may impact hydrogeology and flow types, subsequently affecting life cycles of fish species as well as accretion and deposition of habitats in channel which are reliant on certain flow types e.g. gravel banks;
- **Water pollution** – direct impacts from contaminated run-off or accidental spills which lead to direct mortality of flora or fauna for which the site is designated, or cascading up trophic levels to qualifying features. Changes to nutrient levels of the watercourse which may cause increase growth of algal blooms leading to changes in oxygen and light levels;
- **Air quality** – an increase in deposition of air quality pollutants such as nitrogen or ammonia which can lead to direct smothering of vegetation (detrimental to particularly sensitive species) or changes in nutrient levels of soils, which may impact species above and below ground;

- **Noise and vibration** – direct disturbance to species for which the site is designated. This may lead to a reduction in area which species are able to utilise, or abandonment of nests in the case of breeding birds. Disturbance may also indirectly lead to higher mortality or reduced breeding success if species are spending more time foraging or unable to gather higher quality food for themselves or for young. Noise and vibration disturbance also has potential to impact fish migration and movement;
- **Lighting** – an increase in lighting could make the site less favourable to species for which it is designated and subsequently lead to severance of habitats;
- **Additional recreational pressure** – resulting from new infrastructure providing easier access to, or construction of developments closer to, European designated sites. Impacts on qualifying features could include increased trampling, disturbance or nutrient inputs e.g. from dog walking; and
- **Invasive species and biosecurity** – the spread of invasive species may be a result of changes in nutrient levels, ecosystem dynamics, poor biosecurity during construction or human spread through increased recreation.

4.4 Receptor: European Sites Under Consideration

A comparison between Figure 1 and Figure 3 (below) show an overlap with Ireland's road network and the network of Natura 2000 sites in Ireland. Therefore, the proposed EV charging network is located within proximity to European sites.

Of the 441 SACs designated for one or more of the 59 Annex I habitat types present in Ireland 16 of these Annex I habitat types are designated as 'priority' habitats i.e., habitat types in danger of disappearance and whose natural range mainly falls within the territory of the European Union. Twenty-six SACs are designated due to the presence of an Annex II species.

There are 165 SPAs and one candidate SPA in Ireland designated for the protection of endangered wild birds including listed rare and vulnerable species, regularly occurring migratory species, and for the wetland habitat that support such species.

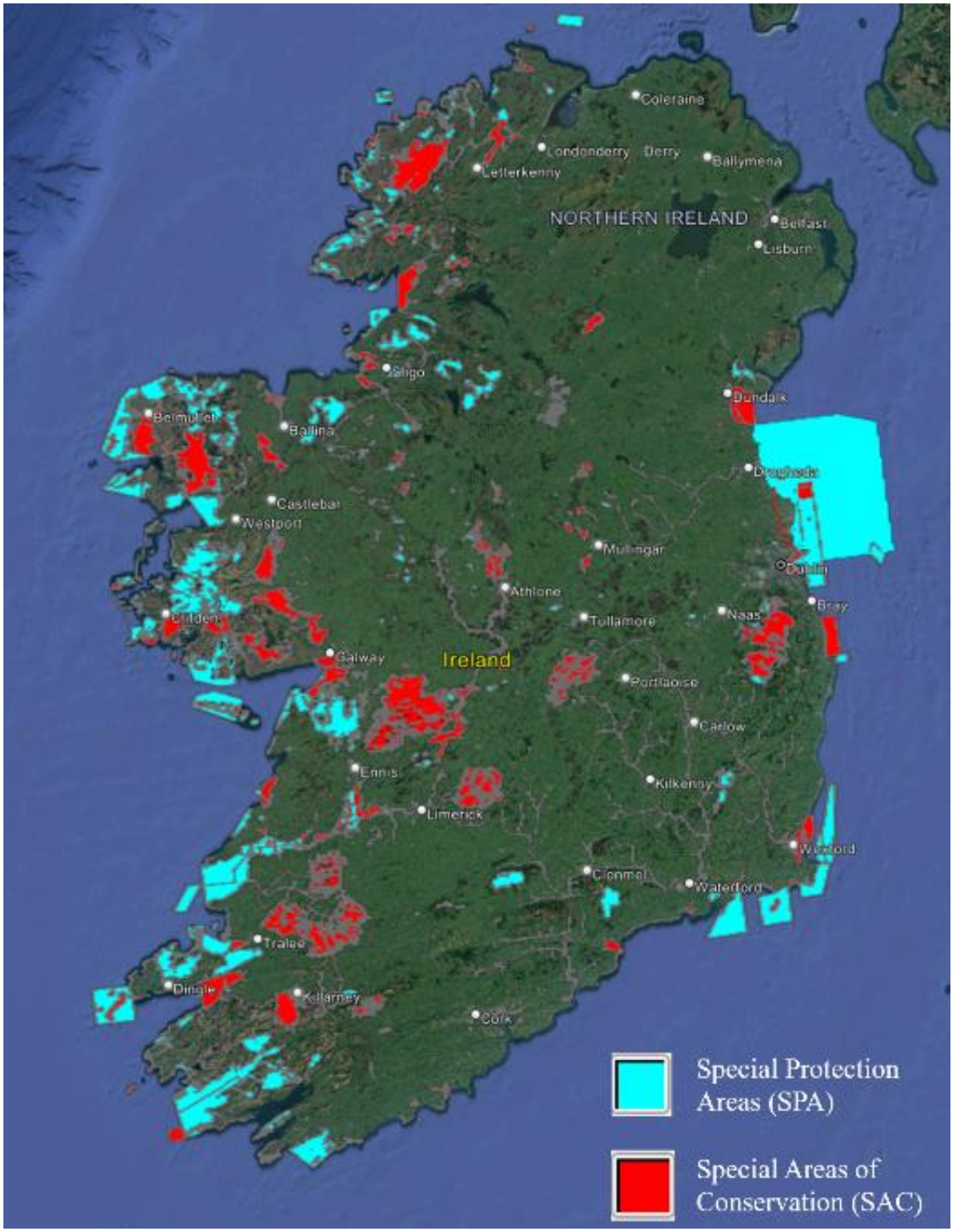

Figure 3 Natura 2000 Network in Ireland

5. Assessment of Effects of the Plan Proposals

5.1 Overview

Figure 4 summarises the key elements of the Source-Pathway-Receptor model considered in this assessment.

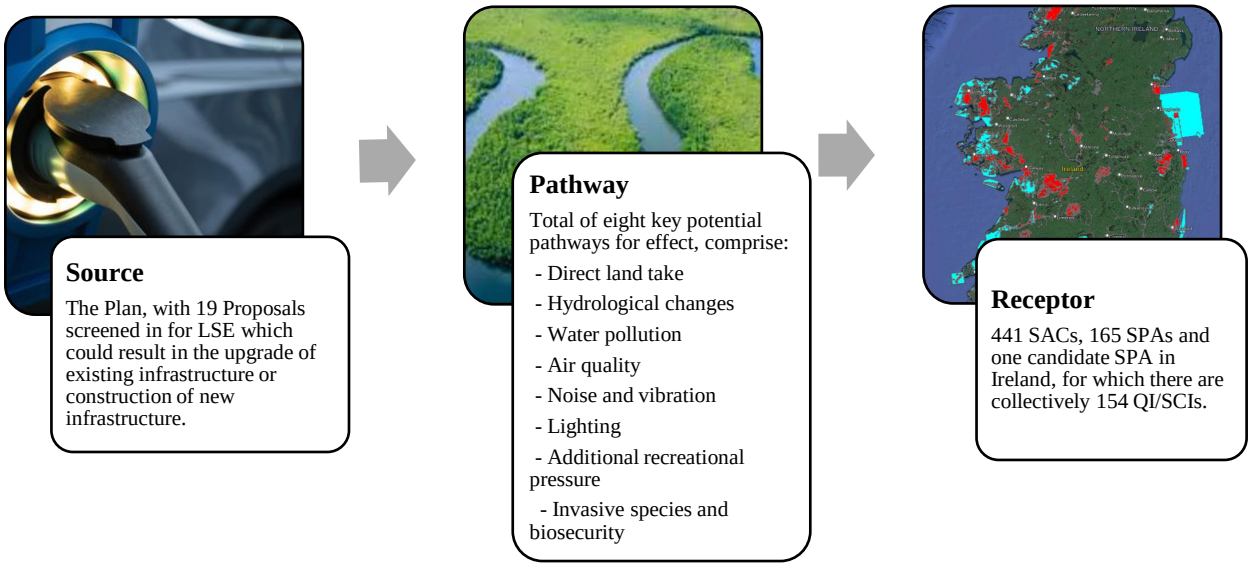

Figure 4 Summary of the Key Elements of the Source-Pathway-Receptor Model Considered in this AA

5.2 Understanding QIs/SCIs and Conservation Objectives of Receptors

The conservation objectives (COs) of the 441 SACs and 165 SPA and one candidate SPA within Ireland are focused primarily on maintaining or restoring the favourable conservation status of the habitats and species of interest (i.e., the qualifying features). Many of the European sites have site-specific conservation objectives (SSCOs), which focus on the specific populations of the qualifying habitat or species at that site by setting targets for appropriate attributes. The maintenance of habitats and species of European sites at favourable conservation status will contribute to the overall maintenance of favourable conservation status of those habitats and species at a national level.

Detailed site synopses for each European site are available from the NPWS website[16]. In Ireland 'generic' COs are available for European sites which have not yet had SSCOs developed. Generic COs which have been developed by NPWS encompass the spirit of site-specific COs in the context of maintaining and restoring favourable conservation condition as follows:

- For SACs: "To maintain or restore the favourable conservation condition of the Annex I habitats and/or Annex II species for which the SAC has been selected"; and
- For SPAs: "To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for the SPA".

Favourable conservation status of a habitat is achieved when:

- Its natural range, and area it covers within that range, are stable or increasing;
- The specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue for the foreseeable future; and

[16] https://www.npws.ie/protected-sites/conservation-management-planning/conservation-objectives

- The conservation status of its typical species is favourable.

The favourable conservation status of a species is achieved when:

- Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats;
- The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and
- There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

5.3 Assessment of Effects

As outlined in Section 3.3, since the Proposals are national in their application and are limited in scale and detail, the discussion of likelihood of any significant effects is high level.

The level of detail and information within the Plan is insufficient to undertake detailed assessment of the adverse effects on individual QIs/SCIs of specific European sites; however, this plan level AA does provide a summary of potential effects of construction and operation resulting from implementation of each of the 19 Plan Proposals (see Section 4.2), across the eight different potential pathways for effect (see Section 4.3).

Key potential effects arising as a result of the following pathways for effect are described here. A summary of potential effects is provided in Section 5.4.

5.3.1 Direct Land-Take

In general, direct land-take from a European site will result in a reduction in habitat for which the European site is designated, or habitat that supports faunal species for which the European site is designated. The reduction in habitat area may also lead to fragmentation (resulting in an increase in edge effects or susceptibility of habitats to damage); habitat isolation; and severance (which may impact life cycles of species e.g. aquatic habitat of fish being severed or impacts on plant dispersal).

During construction, if a European site falls adjacent to existing road (in the case of upgrades), or new infrastructure is planned adjacent to a European site, there may be land take required depending on works needed on that area. Without mitigation, it is possible that any proposal resulting in direct land-take from within a European site and thereby have the potential for adversely effects on the integrity of that European site.

5.3.2 Hydrological Change

In general, an increase or decrease in water entering European sites, and/or changes in groundwater level, have the potential to impact vegetation communities. This could result in loss of important plant species and impacts on fauna reliant on specific plants or vegetation communities. Furthermore, the sites may become more prone to the effects of drought or flooding events. Changes to hydrology within watercourses may impact hydrogeology and flow types, subsequently affecting life cycles of fish species as well as accretion and deposition of habitats in channel that are reliant on certain flow types e.g. gravel banks.

During construction, excavation works for example, may impact on and change groundwater levels. Work in proximity to European sites which are watercourses, could impact their geomorphology. This could also extend into long-term operational impacts if design changes are permanent.

Whilst there is a lack of geographic specificity with the Plan Proposals, it is possible that the construction requirements for the implementation of the Plan may result in direct and indirect hydrological changes which could potentially have adverse effects on the integrity of European sites.

5.3.3 Water Pollution

In general, water pollution can occur from contaminated run-off or accidental spills, which can lead to direct mortality of flora or fauna for which a European site is designated or cascading up trophic levels to qualifying features. Changes to nutrient levels of the watercourse can cause increased growth of algal blooms

leading to changes in oxygen and light levels affecting QI/SCIs of European sites. Water pollution can also lead to habitat degradation of qualifying habitats of European sites.

During construction, works where hydrological pollution pathways exist from construction site to a European Site (e.g. over watercourses or adjacent to European site boundaries), have the potential to result in water pollution which could have adverse effects on the integrity of that European site.

5.3.4 Air Quality

In general, an increase in deposition of air quality pollutants such as nitrogen or ammonia can lead to direct smothering of vegetation (detrimental to particularly sensitive species) or changes in nutrient levels of soils, which may impact species above and below ground, which are QI/SCI of a European site, or in turn support QI/SCI of a European site.

The most common occurrence of air pollution is likely to come from construction vehicles and machinery. The scale of effect that this impact could result in, depends on the scale of construction works and location (i.e. construction (temporary) within a highly urbanised area would be unlikely to change existing air quality enough that it would adversely affect the integrity of a European site).

However, it is also possible that during the operational phase of the Plan Proposals, that a reduction of diesel and petrol emissions will be achieved in proximity to European sites. Given the focus of the Plan Proposals on encouraging the uptake of EVs, an overall positive effect on air quality throughout Ireland is possible in comparison to diesel and petrol engines.

5.3.5 Noise, Vibration, Visual Disturbance

In general, noise, vibration and visual disturbance can lead to direct disturbance to species for which a European site is designated. This may lead to a reduction in area which species are able to utilise, or abandonment of nests in the case of breeding birds. Disturbance may also indirectly lead to higher mortality or reduced breeding success if species are spending more time foraging or unable to gather higher quality food for themselves or for young. Noise and vibration disturbance also has potential to impact fish migration and movement.

Construction works (e.g. piling works, vehicular movements, high numbers of people on site), and operational activities have the potential to result in such disturbance, depending on their proximity to a European site, the nature of habitats between the construction works and European site, existing levels and noise, vibration and visual disturbance in the area, and degree to which QI/SCI can become habituated to such disturbance.

5.3.6 Lighting

In general, an increase in lighting, during construction and/or operation could make a European site less favourable to species for which it is designated (e.g. bats) and subsequently lead to severance of habitats. Construction related lighting impacts are only possible if works occur at night, or construction compounds in close proximity to European sites with light-sensitive QIs/SCIs require night-time lighting.

Implementation of some of the Proposals may require additional lighting (e.g., recharging stations in seasonal / tourist spots or the implementation of the Universal Design Guidelines), however the high-level nature of the Plan means that such detail is not provided in the Plan.

5.3.7 Additional Recreational Pressure

In general, additional recreational pressure may result from new infrastructure (resulting from implementation of the Plan Proposals) providing easier access to, or construction of developments closer to, European sites. Impacts on qualifying features could include increased trampling, disturbance (e.g. noise, visual) or nutrient inputs (e.g. from dog walking).

This pressure applies primarily to the operation of the implemented Plan Proposals, rather than their construction.

A better access for EVs to European sites at specific sites may lead to additional recreational pressure on habitats and species which are QI/SCI of European sites, sensitive to human disturbance. This could lead to

habitat degradation and impair feeding/breeding success of species, adversely affecting integrity of European sites.

5.3.8 Invasive Species and Biosecurity

In general, the spread of invasive species may be a result of changes in nutrient levels, ecosystem dynamics, poor biosecurity during construction or human spread through increased recreation. The spread of invasive species to/in European sites would result in habitat degradation, and possibly the loss of QIs within European sites, affecting the integrity of the European site.

For many of the possible effects of implementation of the Plan Proposals, in particular with regard to pathways such as air pollution, noise, vibration and visual disturbance, it is generally accepted that the further away the construction and/or operation activities are from a European site, the less likely they are to result in a significant effect on the integrity of a European site. For hydrological pathways, this too applies, with hydrologically connective distance rather than direct distance.

5.4 Assessment of Proposals

All proposals brought forward to AA have been assessed and included below in Table 5.1.

Table 5.1 Assessment of Effects on Plan Proposals

AA ref. No.	Proposal	Direct land take	Hydrological change	Water pollution	Air quality	Noise, vibration, visual disturbance	Lighting	Additional recreational pressure	Invasive species, biosecurity
3	Sustainability first: Upgrade of existing facilities and infrastructure will be prioritised to minimise the carbon emissions associated with new construction in line with sustainable development principles. Interventions which are aligned with Climate Action policies and avoid increasing vehicle kilometres will be viewed more favourably. (pg. 46)	Construction If European sites fall adjacent to upgrade works, there may be land take required to facilitate the interventions depending on the works needed.	Construction Excavation works may impact on, and change groundwater. Work alongside the road network running over or near European sites which are watercourses could impact their geomorphology.	Construction Works required where hydrological pollution pathways exist e.g. over watercourses, adjacent to European site boundaries, may result in water pollution which adversely affects the integrity of a European site.	Construction Impacts from construction works associated with works vehicles are unlikely to have a significant effect on integrity of European sites. Operation A positive change is anticipated due to the increased uptake of EVs on Irish roads.	Construction related noise & vibration as well as visual disturbance could affect integrity of European sites (e.g. disturbance of qualifying bird species at critical feeding/breeding times., affecting success of population) Operation Due to the focus of works on existing facilities and infrastructure, it is unlikely that any long-term negative impacts above the existing baseline will arise.	Construction related lighting if works occur at night. Operation Additional lighting associated with new charging stations could disturb qualifying species of a European site.	Construction N/A Operation It is unlikely that the upgrade of existing facilities and infrastructure will generate significant levels of additional recreational pressure on habitats and species which are QI/SCI of European sites, sensitive to human disturbance.	Construction Spread of invasive species during construction to European sites or functionally linked habitat. Operation It is unlikely that there will be an increase in users to European sites as a result of the upgrades to existing facilities and infrastructure. Therefore, it is unlikely that an operational risk of spread of invasive species to European sites will arise.
8	Unblock potential barriers by facilitating and	Construction Grid upgrade and enabling works will likely	Construction Works associated with grid enabling	Construction Works required where hydrological	Construction Impacts from construction works	Construction related noise & vibration as well as visual	Construction related lighting if works occur at night.	Construction N/A	Construction Spread of invasives to European sites

AA ref. No.	Proposal	Direct land take	Hydrological change	Water pollution	Air quality	Noise, vibration, visual disturbance	Lighting	Additional recreational pressure	Invasive species, biosecurity
	progressing grid upgrade enabling works to streamline the process for the private sector companies to access the required grid power/ connections required for high powered charging sites. This is consistent with 'Resource Efficiency' where 'build once for 2040' approach will avoid piecemeal grid upgrades which are resource inefficient. These enabling works should significantly reduce the overall project delivery time for enroute high power EV charging installation. (pg. 47)	If European sites fall adjacent to works required to complete this infrastructure, there may be land take required to facilitate the interventions depending on the works needed.	works may result in groundwater changes.	pollution pathways exist e.g. over watercourses, adjacent to European site boundaries, may result in water pollution which adversely affects the integrity of a European site.	associated with works vehicles are unlikely to have a significant effect on integrity of European sites.	disturbance could affect integrity of European sites (e.g. disturbance of qualifying bird species at critical feeding/breeding times., affecting success of population).		Operation Additional recreational pressures will not arise from the operation of the grid upgrade enabling works.	during construction

AA ref. No.	Proposal	Direct land take	Hydrological change	Water pollution	Air quality	Noise, vibration, visual disturbance	Lighting	Additional recreational pressure	Invasive species, biosecurity
10	Locations are to be considered according to the following order of priority for each option: TEN-T core network Arterial; TEN-T comprehensive (Motorway/Dual Carriageway); TEN-T comprehensive single-carriageway primary road network; and Non TEN-T national primary and secondary road network. (pg. 48)	Construction If European sites fall adjacent to any locations identified where works required, there may be land take required to facilitate the achievement of this proposal depending on the works needed.	Construction Depending on the locations identified, any associated construction may result in groundwater changes.	Construction Any locations identified where hydrological pollution pathways exist (i.e., over watercourses or adjacent to European site boundaries), there is the potential that works may result in water pollution which adversely affects the integrity of a European site.	Construction Impacts from construction works associated with works vehicles are unlikely to have a significant effect on integrity of European sites. Operation A positive change is anticipated due to the increased uptake of EVs on Irish roads	Construction Locations considered within proximity to European sites could result in construction related noise & vibration as well as visual disturbance effects which could affect integrity of European sites (e.g. disturbance of qualifying bird species at critical feeding/breeding times., affecting success of population) Operation Increased availability of en-route charging points may lead to an increase in traffic around European sites.	Construction Locations considered within proximity to European sites could result in construction related lighting effects if works occur at night. Operation Additional lighting associated with new charging stations could disturb qualifying species of a European site.	Construction N/A Operation Better access to the EV charging network across regions may lead to additional recreational pressure on habitats and species which are QI/SCI of European sites, sensitive to human disturbance. This could lead to habitat degradation and impair feeding/breeding success of species, affecting integrity of European sites.	Construction Spread of invasives to European sites during construction Operation Increased recreational access to European sites may lead to spread of invasive species to European sites.
12	Further, while designing the geographical reach of possible options, coverage of	Construction If European sites fall adjacent to any locations identified where works required,	Construction Depending on the locations identified, any works associated with	Construction Any locations identified where hydrological pollution pathways exist	Construction Impacts from construction works associated with works vehicles	Construction Locations considered within proximity to European sites could result	Construction Locations considered within proximity to European sites could result	Construction N/A Operation Better access across regions may lead to	Construction Spread of invasives to European sites during construction

AA ref. No.	Proposal	Direct land take	Hydrological change	Water pollution	Air quality	Noise, vibration, visual disturbance	Lighting	Additional recreational pressure	Invasive species, biosecurity
	urban nodes and other key network nodes to ensure infrastructure availability in high traffic routes and for cross over traffic are likely to be taken into account. (pg. 48)	there may be land take required to facilitate the achievement of this proposal depending on the works needed.	creation of infrastructure may result in groundwater changes.	(i.e., over watercourses or adjacent to European site boundaries), there is the potential works may result in water pollution which adversely affects the integrity of a European site.	are unlikely to have a significant effect on integrity of European sites. Operation A positive change is anticipated due to the increased uptake of EVs on Irish roads	in construction related noise & vibration as well as visual disturbance effects which could affect integrity of European sites (e.g. disturbance of qualifying bird species at critical feeding/breeding times., affecting success of population). Operation Increased availability of en-route charging points may lead to an increase in traffic around European sites.	in construction related lighting effects if works occur at night. Operation Additional lighting associated with new charging stations could disturb qualifying species of a European site.	additional recreational pressure on habitats and species which are QI/SCI of European sites, sensitive to human disturbance. This could lead to habitat degradation and impair feeding/breeding success of species, affecting integrity of European sites.	Operation Increased recreational access to European sites may lead to spread of invasive species to European sites.
13	Further, while designing the geographical reach of possible options, maximum coverage of national road network including regional and rural areas, ensuring	Construction If European sites fall adjacent to any locations identified where works required, there may be land take required to facilitate the achievement of this proposal depending on	Construction Depending on the locations identified, any associated construction may result in groundwater changes.	Construction Any locations identified where hydrological pollution pathways exist (i.e., over watercourses or adjacent to European site boundaries), there is the potential that	Construction Impacts from construction works associated with works vehicles are unlikely to have a significant effect on integrity of European sites. Operation A positive	Construction Locations considered within proximity to European sites could result in construction related noise & vibration as well as visual disturbance effects which could affect	Construction Locations considered within proximity to European sites could result in construction related lighting effects if works occur at night. Operation Additional lighting	Construction N/A Operation Better access to the EV charging network across regions may lead to additional recreational pressure on habitats and species which	Construction Spread of invasives to European sites during construction Operation Increased recreational access to European sites may lead to spread of

AA ref. No.	Proposal	Direct land take	Hydrological change	Water pollution	Air quality	Noise, vibration, visual disturbance	Lighting	Additional recreational pressure	Invasive species, biosecurity
	connectivity and end of routes are well served is likely to be taken into account. (pg. 48)	the works needed.		works may result in water pollution which adversely affects the integrity of a European site.	change is anticipated due to the increased uptake of EVs on Irish roads	integrity of European sites (e.g. disturbance of qualifying bird species at critical feeding/breeding times., affecting success of population) Operation Increased availability of en-route charging points may lead to an increase in traffic around European sites.	associated with new charging stations could disturb qualifying species of a European site.	are QI/SCI of European sites, sensitive to human disturbance. This could lead to habitat degradation and impair feeding/breeding success of species, affecting integrity of European sites.	invasive species to European sites.
14	Further, while designing the geographical reach of possible options, coverage of tourist / seasonal spots adjacent to the national primary and secondary road network is likely to be taken into account (pg. 48)	Construction If European sites fall adjacent to any locations identified where works required, there may be land take required to facilitate the achievement of this proposal depending on the works needed.	Construction Depending on the locations identified, any works associated with creation of infrastructure may result in groundwater changes.	Construction Any locations identified where hydrological pollution pathways exist (i.e., over watercourses or adjacent to European site boundaries), there is the potential works may result in water pollution which adversely affects the integrity of a European site.	Construction Impacts from construction works associated with works vehicles are unlikely to have a significant effect on integrity of European sites. Operation A positive change is anticipated due to the increased uptake of EVs on Irish roads	Construction Locations considered within proximity to European sites could result in construction related noise & vibration as well as visual disturbance effects which could affect integrity of European sites (e.g. disturbance of qualifying bird species at critical feeding/breeding	Construction Locations considered within proximity to European sites could result in construction related lighting effects if works occur at night. Operation Additional lighting associated with new charging stations could disturb qualifying	Construction N/A Operation Better access across regions may lead to additional recreational pressure on habitats and species which are QI/SCI of European sites, sensitive to human disturbance. This could lead to habitat degradation and impair	Construction Spread of invasives to European sites during construction Operation Increased recreational access to European sites may lead to spread of invasive species to European sites.

AA ref. No.	Proposal	Direct land take	Hydrological change	Water pollution	Air quality	Noise, vibration, visual disturbance	Lighting	Additional recreational pressure	Invasive species, biosecurity
						times., affecting success of population) Operation Increased availability of en-route charging points may lead to an increase in traffic around European sites.	species of a European site.	feeding/breeding success of species, affecting integrity of European sites.	
18	As indicated in the 2022-2025 EV Charging Infrastructure Strategy, ZEVI has been working on developing a set of Universal Design Guidelines for charging infrastructure. The aim of these guidelines is to make electric vehicle charging stations accessible to all users. The guidelines summarise key considerations when installing electric vehicle charging stations,	Construction Additional landtake may be required to facilitate the accessibility requirements of the Universal Design Guidelines which may potentially impact any European sites depending on the location of works.	Construction Depending on the locations identified, any works associated with creation of infrastructure may result in groundwater changes.	Construction Any locations identified where hydrological pollution pathways exist (i.e., over watercourses or adjacent to European site boundaries), there is the potential works may result in water pollution which adversely affects the integrity of a European site.	Construction Impacts from construction works associated with works vehicles are unlikely to have a significant effect on integrity of European sites. Operation A positive change is anticipated due to the increased uptake of EVs on Irish roads	Construction Locations considered within proximity to European sites could result in construction related noise & vibration as well as visual disturbance effects which could affect integrity of European sites (e.g. disturbance of qualifying bird species at critical feeding/breeding times., affecting success of population) Operation Increased availability of en-route	Construction Locations considered within proximity to European sites could result in construction related lighting effects if works occur at night. Operation Implementation of the Universal Design Guidelines will require additional lighting and signage around charging points which have the potential to disturb qualifying species of a European site.	Construction N/A Operation Better access across regions may lead to additional recreational pressure on habitats and species which are QI/SCI of European sites, sensitive to human disturbance. This could lead to habitat degradation and impair feeding/breeding success of species, affecting integrity of European sites.	Construction Spread of invasives to European sites during construction Operation Increased recreational access to European sites may lead to spread of invasive species to European sites.

AA ref. No.	Proposal	Direct land take	Hydrological change	Water pollution	Air quality	Noise, vibration, visual disturbance	Lighting	Additional recreational pressure	Invasive species, biosecurity
	including the design of the charging station, accessibility of the site, and information and communications to inform users before, during, and after a charging session. This document was published in July 2023 for public consultation. (pg. 51)					charging points may lead to an increase in traffic around European sites.			
20	While the market may dictate additional connectors, charging points for light-duty vehicles will be equipped (at least) with Type 2 connectors for AC connections and Combo 2 connectors for DC connections. Future innovations, such as wireless charging, will also be required to comply with minimum	Construction If European sites fall adjacent to any works required to facilitate additional connectors, there may be land take required to facilitate the achievement of this proposal depending on the works needed.	Construction Depending on the works required to facilitate the additional connectors, any associated works may result in groundwater changes.	Construction Any locations identified where hydrological pollution pathways exist (i.e., over watercourses or adjacent to European site boundaries), there is the potential works may result in water pollution which adversely affects the integrity of a European site.	Construction Impacts from construction works associated with works vehicles are unlikely to have a significant effect on integrity of European sites. Operation A positive change is anticipated due to the increased uptake of EVs on Irish roads	Construction Locations considered within proximity to European sites could result in construction related noise & vibration as well as visual disturbance effects which could affect integrity of European sites (e.g. disturbance of qualifying bird species at critical feeding/breeding times., affecting	Construction Locations considered within proximity to European sites could result in construction related lighting effects if works occur at night. Operation Additional lighting associated with new charging stations could disturb qualifying species of a European site.	Construction N/A Operation Better access to EV charging networks across regions may lead to additional recreational pressure on habitats and species which are QI/SCI of European sites, sensitive to human disturbance. This could lead to habitat degradation and impair	Construction Spread of invasives to European sites during construction Operation Increased recreational access to European sites may lead to spread of invasive species to European sites.

AA ref. No.	Proposal	Direct land take	Hydrological change	Water pollution	Air quality	Noise, vibration, visual disturbance	Lighting	Additional recreational pressure	Invasive species, biosecurity
	technical specifications. (pg. 51)					success of population) Operation Increased availability of en-route charging points may lead to an increase in traffic around European sites.		feeding/breeding success of species, affecting integrity of European sites.	
24	From one year after AFIR comes into force, all new public charge points (installed from that point onwards) will be required to be enabled for smart charging. This will enable future Vehicle-to-Grid operations and other system services and efficiencies such as electricity-demand regulation. (pg. 52)	Construction If European sites fall adjacent to any locations identified where works are required to adhere to the chosen alternatives, there may be land take required to facilitate the achievement of this proposal depending on the works needed.	Construction Depending on the locations identified in the facilitation of the alternatives chosen, any associated works may result in groundwater changes.	Construction Any locations identified where hydrological pollution pathways exist (i.e., over watercourses or adjacent to European site boundaries), there is the potential works may result in water pollution which adversely affects the integrity of a European site.	Construction Impacts from construction works associated with works vehicles are unlikely to have a significant effect on integrity of European sites. Operation A positive change is anticipated due to the increased uptake of EVs on Irish roads	Construction Locations considered within proximity to European sites could result in construction related noise & vibration as well as visual disturbance effects which could affect integrity of European sites (e.g. disturbance of qualifying bird species at critical feeding/breeding times., affecting success of population) Operation Increased availability of en-route	Construction Locations considered within proximity to European sites could result in construction related lighting effects if works occur at night. Operation Additional lighting associated with new charging stations could disturb qualifying species of a European site.	Construction N/A Operation Better access to EV charging networks across regions may lead to additional recreational pressure on habitats and species which are QI/SCI of European sites, sensitive to human disturbance. This could lead to habitat degradation and impair feeding/breeding success of species, affecting	Construction Spread of invasives to European sites during construction Operation Increased recreational access to European sites may lead to spread of invasive species to European sites.

AA ref. No.	Proposal	Direct land take	Hydrological change	Water pollution	Air quality	Noise, vibration, visual disturbance	Lighting	Additional recreational pressure	Invasive species, biosecurity
						charging points may lead to an increase in traffic around European sites.		integrity of European sites.	
26	For passenger/LDV charging, three alternatives for the delivery of en-route infrastructure for passenger/LDV for 2025 and 2030 are outlined (See Table 11 and Table 12 of the Plan). At minimum, Alternative 1 must be delivered in order to meet AFIR's specific TEN-T road network requirements. However, results of analysis show that more than this is needed, in order to deliver AFIR's fleet-based targets and also to be ahead of the needs of EV drivers.	Construction If European sites fall adjacent to any locations identified where works are required to adhere to the chosen alternatives, there may be land take required to facilitate the achievement of this proposal depending on the works needed.	Construction Depending on the locations identified in the facilitation of the alternatives chosen, any associated works may result in groundwater changes.	Construction Any locations identified where hydrological pollution pathways exist (i.e., over watercourses or adjacent to European site boundaries), there is the potential works may result in water pollution which adversely affects the integrity of a European site.	Construction Impacts from construction works associated with works vehicles are unlikely to have a significant effect on integrity of European sites. Operation A positive change is anticipated due to the increased uptake of EVs on Irish roads	Construction Locations considered within proximity to European sites could result in construction related noise & vibration as well as visual disturbance effects which could affect integrity of European sites (e.g. disturbance of qualifying bird species at critical feeding/breeding times., affecting success of population) Operation Increased availability of en-route charging points may lead to an increase in traffic around European sites.	Construction Locations considered within proximity to European sites could result in construction related lighting effects if works occur at night. Operation Additional lighting associated with new charging stations could disturb qualifying species of a European site.	Construction N/A Operation Better access to EV charging networks across regions may lead to additional recreational pressure on habitats and species which are QI/SCI of European sites, sensitive to human disturbance. This could lead to habitat degradation and impair feeding/breeding success of species, affecting integrity of European sites.	Construction Spread of invasives to European sites during construction Operation Increased recreational access to European sites may lead to spread of invasive species to European sites.

AA ref. No.	Proposal	Direct land take	Hydrological change	Water pollution	Air quality	Noise, vibration, visual disturbance	Lighting	Additional recreational pressure	Invasive species, biosecurity
	Therefore, the target will be to deliver Alternative 2 and if possible Alternative 3 specifically in those areas of higher demand. (pg. 54)								
27	By 2025, for 15% of the TEN-T Core & Comprehensive (Figure 1) 1400kW every 120km in each direction will be provided with at least one charge point with 350kW. (pg. 56)	Construction If European sites fall adjacent to any locations identified where works required, there may be land take required to facilitate the achievement of this proposal depending on the works needed.	Construction Depending on the locations identified, any associated construction may result in groundwater changes.	Construction Any locations identified where hydrological pollution pathways exist (i.e., over watercourses or adjacent to European site boundaries), there is the potential that works may result in water pollution which adversely affects the integrity of a European site.	Construction Impacts from construction works associated with works vehicles are unlikely to have a significant effect on integrity of European sites. Operation A positive change is anticipated due to the increased uptake of EVs on Irish roads	Construction Locations considered within proximity to European sites could result in construction related noise & vibration as well as visual disturbance effects which could affect integrity of European sites (e.g. disturbance of qualifying bird species at critical feeding/breeding times., affecting success of population) Operation Increased availability of en-route charging points may lead to an	Construction Locations considered within proximity to European sites could result in construction related lighting effects if works occur at night. Operation Additional lighting associated with new charging stations could disturb qualifying species of a European site.	Construction N/A Operation Better access to the EV charging network across regions may lead to additional recreational pressure on habitats and species which are QI/SCI of European sites, sensitive to human disturbance. This could lead to habitat degradation and impair feeding/breeding success of species, affecting integrity of European sites.	Construction Spread of invasives to European sites during construction Operation Increased recreational access to European sites may lead to spread of invasive species to European sites.

AA ref. No.	Proposal	Direct land take	Hydrological change	Water pollution	Air quality	Noise, vibration, visual disturbance	Lighting	Additional recreational pressure	Invasive species, biosecurity
						increase in traffic around European sites.			
28	By 2025, at Urban Nodes (Dublin, Cork, Foynes and Galway), 900kW will be provided by stations with an individual power output of 150kW. (pg. 56)	Construction If European sites fall adjacent to any locations identified where works required, there may be land take required to facilitate the achievement of this proposal depending on the works needed.	Construction Depending on the locations identified, any associated construction may result in groundwater changes.	Construction Any locations identified where hydrological pollution pathways exist (i.e., over watercourses or adjacent to European site boundaries), there is the potential that works may result in water pollution which adversely affects the integrity of a European site.	Construction Impacts from construction works associated with works vehicles are unlikely to have a significant effect on integrity of European sites. Operation A positive change is anticipated due to the increased uptake of EVs on Irish roads	Construction Locations considered within proximity to European sites could result in construction related noise & vibration as well as visual disturbance effects which could affect integrity of European sites (e.g. disturbance of qualifying bird species at critical feeding/breeding times., affecting success of population) Operation Increased availability of en-route charging points may lead to an increase in traffic around European sites.	Construction Locations considered within proximity to European sites could result in construction related lighting effects if works occur at night. Operation Additional lighting associated with new charging stations could disturb qualifying species of a European site.	Construction N/A Operation Better access to the EV charging network across regions may lead to additional recreational pressure on habitats and species which are QI/SCI of European sites, sensitive to human disturbance. This could lead to habitat degradation and impair feeding/breeding success of species, affecting integrity of European sites.	Construction Spread of invasives to European sites during construction Operation Increased recreational access to European sites may lead to spread of invasive species to European sites.
29	By 2027, 50% of the TEN-T Core will have	Construction If European sites fall adjacent to	Construction Depending on the locations	Construction Any locations identified where	Construction Impacts from construction	Construction Locations considered	Construction Locations considered	Construction N/A Operation	Construction Spread of invasives to

AA ref. No.	Proposal	Direct land take	Hydrological change	Water pollution	Air quality	Noise, vibration, visual disturbance	Lighting	Additional recreational pressure	Invasive species, biosecurity
	2800kW every 120km in each direction with at least two charge points with 350kW. (pg. 56)	any locations identified where works required, there may be land take required to facilitate the achievement of this proposal depending on the works needed.	identified, any associated construction may result in groundwater changes.	hydrological pollution pathways exist (i.e., over watercourses or adjacent to European site boundaries), there is the potential that works may result in water pollution which adversely affects the integrity of a European site.	works associated with works vehicles are unlikely to have a significant effect on integrity of European sites. Operation A positive change is anticipated due to the increased uptake of EVs on Irish roads	within proximity to European sites could result in construction related noise & vibration as well as visual disturbance effects which could affect integrity of European sites (e.g. disturbance of qualifying bird species at critical feeding/breeding times., affecting success of population) Operation Increased availability of en-route charging points may lead to an increase in traffic around European sites.	within proximity to European sites could result in construction related lighting effects if works occur at night. Operation Additional lighting associated with new charging stations could disturb qualifying species of a European site.	Better access to the EV charging network across regions may lead to additional recreational pressure on habitats and species which are QI/SCI of European sites, sensitive to human disturbance. This could lead to habitat degradation and impair feeding/breeding success of species, affecting integrity of European sites.	European sites during construction Operation Increased recreational access to European sites may lead to spread of invasive species to European sites.
30	By 2027, 50% of the TEN-T Comprehensive will have 1,400kW in each direction, with at least one charge point with 350kW. (pg. 56)	Construction If European sites fall adjacent to any locations identified where works required, there may be land take required to facilitate the	Construction Depending on the locations identified, any associated construction may result in groundwater changes.	Construction Any locations identified where hydrological pollution pathways exist (i.e., over watercourses or adjacent to European site	Construction Impacts from construction works associated with works vehicles are unlikely to have a significant effect	Construction Locations considered within proximity to European sites could result in construction related noise & vibration as well as visual	Construction Locations considered within proximity to European sites could result in construction related lighting effects if works occur at night.	Construction N/A Operation Better access to the EV charging network across regions may lead to additional recreational	Construction Spread of invasives to European sites during construction Operation Increased recreational access to

AA ref. No.	Proposal	Direct land take	Hydrological change	Water pollution	Air quality	Noise, vibration, visual disturbance	Lighting	Additional recreational pressure	Invasive species, biosecurity
		achievement of this proposal depending on the works needed.		boundaries), there is the potential that works may result in water pollution which adversely affects the integrity of a European site.	on integrity of European sites. Operation A positive change is anticipated due to the increased uptake of EVs on Irish roads	disturbance effects which could affect integrity of European sites (e.g. disturbance of qualifying bird species at critical feeding/breeding times., affecting success of population) Operation Increased availability of en-route charging points may lead to an increase in traffic around European sites.	Operation Additional lighting associated with new charging stations could disturb qualifying species of a European site.	pressure on habitats and species which are QI/SCI of European sites, sensitive to human disturbance. This could lead to habitat degradation and impair feeding/breeding success of species, affecting integrity of European sites.	European sites may lead to spread of invasive species to European sites.
31	By 2027, at each HDV parking and rest areas dedicated to overnight parking, 2 recharging stations dedicated to heavy-duty vehicles with a minimum 100kW each will be provided. (Note: Ireland do not have any	Construction If European sites fall adjacent to any locations identified where works required, there may be land take required to facilitate the achievement of this proposal depending on the works needed.	Construction Depending on the locations identified, any associated construction may result in groundwater changes.	Construction Any locations identified where hydrological pollution pathways exist (i.e., over watercourses or adjacent to European site boundaries), there is the potential that works may result in water pollution which adversely affects	Construction Impacts from construction works associated with works vehicles are unlikely to have a significant effect on integrity of European sites. Operation A positive change is anticipated due to the increased	Construction Locations considered within proximity to European sites could result in construction related noise & vibration as well as visual disturbance effects which could affect integrity of European sites (e.g. disturbance of qualifying	Construction Locations considered within proximity to European sites could result in construction related lighting effects if works occur at night. Operation Additional lighting associated with new charging stations could disturb	Construction N/A Operation Better access to the EV charging network across regions may lead to additional recreational pressure on habitats and species which are QI/SCI of European sites, sensitive to human	Construction Spread of invasives to European sites during construction Operation Increased recreational access to European sites may lead to spread of invasive species to European sites.

AA ref. No.	Proposal	Direct land take	Hydrological change	Water pollution	Air quality	Noise, vibration, visual disturbance	Lighting	Additional recreational pressure	Invasive species, biosecurity
	such sites at present). (pg. 56)			the integrity of a European site.	uptake of EVs on Irish roads	bird species at critical feeding/breeding times., affecting success of population) Operation Increased availability of en-route charging points may lead to an increase in traffic around European sites.	qualifying species of a European site.	disturbance. This could lead to habitat degradation and impair feeding/breeding success of species, affecting integrity of European sites.	
32	By 2030, the TEN-T Core will have 3600kW in each direction with at least two stations with 350kW each. (pg. 56)	Construction If European sites fall adjacent to any locations identified where works required, there may be land take required to facilitate the achievement of this proposal depending on the works needed.	Construction Depending on the locations identified, any associated construction may result in groundwater changes.	Construction Any locations identified where hydrological pollution pathways exist (i.e., over watercourses or adjacent to European site boundaries), there is the potential that works may result in water pollution which adversely affects the integrity of a European site.	Construction Impacts from construction works associated with works vehicles are unlikely to have a significant effect on integrity of European sites. Operation A positive change is anticipated due to the increased uptake of EVs on Irish roads	Construction Locations considered within proximity to European sites could result in construction related noise & vibration as well as visual disturbance effects which could affect integrity of European sites (e.g. disturbance of qualifying bird species at critical feeding/breeding times., affecting success of population)	Construction Locations considered within proximity to European sites could result in construction related lighting effects if works occur at night. Operation Additional lighting associated with new charging stations could disturb qualifying species of a European site.	Construction N/A Operation Better access to the EV charging network across regions may lead to additional recreational pressure on habitats and species which are QI/SCI of European sites, sensitive to human disturbance. This could lead to habitat degradation and impair feeding/breeding success of	Construction Spread of invasives to European sites during construction Operation Increased recreational access to European sites may lead to spread of invasive species to European sites.

AA ref. No.	Proposal	Direct land take	Hydrological change	Water pollution	Air quality	Noise, vibration, visual disturbance	Lighting	Additional recreational pressure	Invasive species, biosecurity
						Operation Increased availability of en-route charging points may lead to an increase in traffic around European sites.		species, affecting integrity of European sites.	
33	By 2030, the TEN-T Comprehensive will have 1500kW every 100km in each direction with at least one station at 350kW. (pg. 56)	Construction If European sites fall adjacent to any locations identified where works required, there may be land take required to facilitate the achievement of this proposal depending on the works needed.	Construction Depending on the locations identified, any associated construction may result in groundwater changes.	Construction Any locations identified where hydrological pollution pathways exist (i.e., over watercourses or adjacent to European site boundaries), there is the potential that works may result in water pollution which adversely affects the integrity of a European site.	Construction Impacts from construction works associated with works vehicles are unlikely to have a significant effect on integrity of European sites. Operation A positive change is anticipated due to the increased uptake of EVs on Irish roads	Construction Locations considered within proximity to European sites could result in construction related noise & vibration as well as visual disturbance effects which could affect integrity of European sites (e.g. disturbance of qualifying bird species at critical feeding/breeding times., affecting success of population) Operation Increased availability of en-route charging points may lead to an increase in	Construction Locations considered within proximity to European sites could result in construction related lighting effects if works occur at night. Operation Additional lighting associated with new charging stations could disturb qualifying species of a European site.	Construction N/A Operation Better access to the EV charging network across regions may lead to additional recreational pressure on habitats and species which are QI/SCI of European sites, sensitive to human disturbance. This could lead to habitat degradation and impair feeding/breeding success of species, affecting integrity of European sites.	Construction Spread of invasives to European sites during construction Operation Increased recreational access to European sites may lead to spread of invasive species to European sites.

AA ref. No.	Proposal	Direct land take	Hydrological change	Water pollution	Air quality	Noise, vibration, visual disturbance	Lighting	Additional recreational pressure	Invasive species, biosecurity
						traffic around European sites.			
34	By 2030, at each safe and secure parking area, 4 recharging stations will be provided which are dedicated for heavy-duty vehicles (minimum 100kW each) (Note: Ireland do not have any such sites at present). (pg. 56)	Construction If European sites fall adjacent to any locations identified where works required, there may be land take required to facilitate the achievement of this proposal depending on the works needed.	Construction Depending on the locations identified, any associated construction may result in groundwater changes.	Construction Any locations identified where hydrological pollution pathways exist (i.e., over watercourses or adjacent to European site boundaries), there is the potential that works may result in water pollution which adversely affects the integrity of a European site.	Construction Impacts from construction works associated with works vehicles are unlikely to have a significant effect on integrity of European sites. Operation A positive change is anticipated due to the increased uptake of EVs on Irish roads	Construction Locations considered within proximity to European sites could result in construction related noise & vibration as well as visual disturbance effects which could affect integrity of European sites (e.g. disturbance of qualifying bird species at critical feeding/breeding times., affecting success of population) Operation Increased availability of en-route charging points may lead to an increase in traffic around European sites.	Construction Locations considered within proximity to European sites could result in construction related lighting effects if works occur at night. Operation Additional lighting associated with new charging stations could disturb qualifying species of a European site.	Construction N/A Operation Better access to the EV charging network across regions may lead to additional recreational pressure on habitats and species which are QI/SCI of European sites, sensitive to human disturbance. This could lead to habitat degradation and impair feeding/breeding success of species, affecting integrity of European sites.	Construction Spread of invasives to European sites during construction Operation Increased recreational access to European sites may lead to spread of invasive species to European sites.
35	By 2030, 1800kW will be provided by stations with an	Construction If European sites fall adjacent to any locations	Construction Depending on the locations identified, any	Construction Any locations identified where hydrological	Construction Impacts from construction works	Construction Locations considered within proximity	Construction Locations considered within proximity	Construction N/A Operation Better access to	Construction Spread of invasives to European sites

AA ref. No.	Proposal	Direct land take	Hydrological change	Water pollution	Air quality	Noise, vibration, visual disturbance	Lighting	Additional recreational pressure	Invasive species, biosecurity
	individual power output of 150kW in Urban Nodes. (pg. 56)	identified where works required, there may be land take required to facilitate the achievement of this proposal depending on the works needed.	associated construction may result in groundwater changes.	pollution pathways exist (i.e., over watercourses or adjacent to European site boundaries), there is the potential that works may result in water pollution which adversely affects the integrity of a European site.	associated with works vehicles are unlikely to have a significant effect on integrity of European sites. Operation A positive change is anticipated due to the increased uptake of EVs on Irish roads	to European sites could result in construction related noise & vibration as well as visual disturbance effects which could affect integrity of European sites (e.g. disturbance of qualifying bird species at critical feeding/breeding times., affecting success of population) Operation Increased availability of en-route charging points may lead to an increase in traffic around European sites.	to European sites could result in construction related lighting effects if works occur at night. Operation Additional lighting associated with new charging stations could disturb qualifying species of a European site.	the EV charging network across regions may lead to additional recreational pressure on habitats and species which are QI/SCI of European sites, sensitive to human disturbance. This could lead to habitat degradation and impair feeding/breeding success of species, affecting integrity of European sites.	during construction Operation Increased recreational access to European sites may lead to spread of invasive species to European sites.

5.5 Consideration of In Combination Effects

The Plan will, in a broader sense, interact with other plans. It seeks to inform policy and strategy for the future development of en-route EV charging network across Ireland up to 2030.

The Plan Proposals are set at a national level and are limited in their geographic specificity and detail; therefore, no information is provided of any infrastructure development proposals including their design, specific location or timescales for construction. In the absence of further detailed information, it is not possible to provide more than a high-level assessment, as is appropriate and relevant to the scale of the Plan.

The scope of application of the Plan Proposals does overlap with plans, programmes and policies (outlined in detail in Appendix B), as the Plan has been developed in the context of these documents. Updates of these plans, programmes and policies in future should take into account the Plan Proposals and associated measures to mitigate adverse effects on the integrity of European sites when they are drafted, and such future plans, programmes and policies will themselves undergo their own AA. Such AAs would include consideration of in-combination effects.

The Plan Proposals could be taken forward to implementation through a variety of mechanisms, including inclusion in national policy, regional plans and/or development proposals. Each of these routes to implementation would be subject to the AA process, be that plan-level AA (e.g. if the Proposals are incorporated into future iterations of regional strategies) or project-level AA.

Given the nature and scale of the potential EV charging infrastructure which may be implemented arising from the Plan and the current lack of geographic specificity to locations it is not possible to identify any in-combination effects with the Plan. In-combination effects would be more appropriately assessed during any proposed projects arising from implementation of the plan.

5.6 Mitigation

To mitigate the potential for adverse effects on the integrity of European Sites (identified in Section 5.3, above) resulting from the implementation of the Plan, the following Proposals have been made, in relation to incorporating new text within the Plan. The proposed mitigation measures for inclusion are outlined in Table 5.2 below.

In addition to this, the following text changes were recommended to the Plan:

- In Section 4.5 *Supporting Policy and Regulation* on page 35, it is recommended that an additional subsection is included entitled **Environmental Considerations** which states "*development of EV charging infrastructure or the creation of national standards for EV charging shall refer to the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) S.I 293/2021 and the EIA Directive 2014/52/EU as required. Any development of EV charging infrastructure shall be subject to EIA and AA Screening*;

- In the Proposed Procurement Approach outlined on page 36, it is recommended that an additional requirement for shortlisted CPOs/Support Applicants in Step 3 be included, which states "*evidence of an environmental checklist to be provided including consideration of impacts to European sites."*

- Figure 18 on page 37 outlines the sequence of events to deliver the required infrastructure. The final box under Critical Path Items titled should include "*EIA and AA to be carried out (where necessary)*

- Table 14 on page 45 outlines the risks to implementation of which legal challenges to scheme launched is included. The dependency of this risk states: *"These schemes will be designed in line with EU regulations, including State Aid rules. designed to ensure that any interventions are proportionate, transparent and represent value for money. This document gives the broad outline of the proposed intervention along with the principles and options (see Chapter 4). Through feedback to this consultation along with industry engagement – the schemes will be designed to ensure they will be open to participation by all qualified applicants and awards will be made according to* ***clear criteria*** *which are non-discriminatory*.".

It is recommended that the last sentence should instead say: "*the schemes will be designed to ensure they will be open to participation by all qualified applicants and awards will be made according to clear criteria which are non-discriminatory* ***and include relevant environmental considerations****"*.

Table 5.2 Proposed wording for inclusion in the Plan to ensure mitigation of potentially adverse effects on the integrity of European sites

Pathway for Effect	Mitigation
Direct Land-Take	The design of any developments arising from the implementation of the Plan will ensure that measures are explored to avoid unnecessary land-take, in line with the ecological mitigation hierarchy which prioritises avoidance, and seeks to reduce, mitigate and then compensate and offset for adverse effects on biodiversity, in that order of preference. If land-take cannot be avoided, an assessment of the type (and use) of habitat present is required to determine suitable mitigation and/or compensation measures.
Hydrological Change	Where proposed work has the potential to result in hydrological change, and there is a European Site within the zone of influence, then design level modelling will be undertaken to determine any potential hydrological change as a result of any proposed construction works which may impact on the hydrology of sites within the zone of influence of the implementation of the Plan, including European Sites designated for their international nature conservation importance. This will also help to inform the overall design of any infrastructure requirements.
Water Pollution	Where proposed work has the potential to result in water pollution, and there is hydrological connectivity to a European Site, Surface Water Management Plans (SWMPs) will be prepared for planning submission of development proposals and implemented during construction where impacts on sensitive waterbodies are likely to arise. SWMPs will include appropriate measures such as temporary silt fencing, cut off ditches, settlement ponds and bunds set up early in construction to capture runoff and prevent ingress of sediments and contaminants into existing drainage infrastructure where necessary. Integrated and innovative solutions require a partnering approach best managed through a SWMP. Where implementation of the Proposals presents a challenge to existing drainage systems, and/or the operation of a local drainage system is known to be complicated by interactions between river, groundwater and sewer systems or river and canal systems, submission of a Water Protection Plan and detailed site drainage plans will be required with planning applications associated with developments arising from the implementation of the Plan, if a European Site falls within the zone of influence.
Air Quality	Where there is potential for implementation of the Plan to result in significant increases in air pollution, and a European Site falls within the zone of influence of such implementation, then air quality modelling should be undertaken to determine potential air quality impacts of the implementation of the Plan on sites, including European Sites within the zone of influence. Where increased air pollution may result in adverse effects on habitats, potential solutions to mitigate air pollution and resulting dust and nitrogen deposition may include: tree planting to reduce deposition of pollutants on a site (this is site and habitat dependent); preparation and implementation of dust management plans, screening and the provision of compensatory habitat (where practicable).
Noise, Vibration, Visual Disturbance	Development proposals arising as a result of implementation of the Plan will have regard to the requirements of the Noise Directive 2002/49/EC and associated Environmental Noise Regulations 2006 ES 45 and European Communities (Environmental Noise) Regulations 2018 S.I. No. 549/2018 (and any updated/superseding documents). Development proposals will provide evidence that the design does not result in increased noise, vibration or visual disturbance to important ecological receptors within the zone of influence, in particular those that are QI/SCIs of European Sites, to the degree that the noise/vibration/visual disturbance affects the integrity of the ecological receptor. In constructing development proposals arising as a result of the Plan regard shall also be given to BS 5228 Part 1 (2014) and the European Communities (Noise Emission by Equipment for Use Outdoors) Regulations, 2001 'Code of Practice for Noise and Vibration Control on Construction and Open Sites' (and any updated/superseding documents).
Lighting	Proposals arising from the implementation of the Plan will demonstrate that the design of lighting minimises the incidence of light spillage or pollution into the surrounding environment and that there is no unacceptable adverse effect on the integrity of European Sites (i.e. no unacceptable adverse effect on QIs/SCIs of European Sites). It should be demonstrated that the design and implementation of a hierarchy of light intensity zones has been factored into designs to ensure that environmental impact is minimised as far as possible particularly in areas proximate to ecological corridors and European Sites. It is encouraged that that any developments arising from the implementation of the Plan maintain dark skies in rural areas and limit light pollution in urban and rural areas.

Pathway for Effect	Mitigation
Additional Recreational Pressure	Improving the EV charging network across Ireland increases accessibility to protected areas, which places pressure on habitats and species within the protected areas, and can have adverse effects on the integrity of such sites. Mitigation requirements would be dependent on the level of potential recreational pressure and the actual site in question, but mitigation needs to ensure that there are no adverse effects on the integrity of European Sites resulting from implementation of the Plan Proposals. Examples of mitigation could include guided paths to less sensitive areas of Protected Sites, or reduced access at certain times of year when important features of a site are at their most sensitive e.g. breeding bird season.
Invasive Species and Biosecurity	Appropriate invasive species surveys shall be carried out in advance of any construction/reinstatement works. Invasive Species Management Plans shall be prepared and implemented where required, following the assessment of invasive species surveys.

The information provided within this document should be built on and used to assist in development of an AA of project or plan-level documents. This includes a thorough assessment of the QIs/SCIs, conservation objectives, current condition of the relevant European sites (including supplementary advice if available) and potential impacts on QIs/SCIs as a result of each proposed plan, to determine appropriate mitigation (if required) and any adverse effects on integrity of the site.

It should also be noted that any project proposal relating to one of the proposals will be subject to a project level AA. Consequently, the public authority will determine whether the proposed project fails or passes the AA test on a case-by-case basis.

6. Summary

6.1 Overview

In summary, this NIS provides the relevant information for the public authority (the Department of Transport), regarding the potential for adverse effects on the integrity of European sites, resulting from implementation of the final Proposals from the Plan.

The Plan includes Proposals which do not represent official policy, but aim to provide a constructive, evidence-based approach for delivering the goals and objectives of the Plan. In total, the Plan makes 35 Proposals that provide a foundation on which to develop the EV charging network across Ireland.

6.2 Assessment of Effects

Based on the source-pathway-receptor model, the ZoI of this NIS is considered to be the entire country of Ireland, given the source is the 19 Proposals which have the potential to adversely impact European sites and cover the majority of Ireland. Eight key types of pathway for effect on European sites have been cited in this report, with receptors being those all sites within European site network across Ireland which comprises 165 SPAs, one candidate SPA and 441 SACs.

Mitigation has been proposed which comprises high-level measures designed to prevent direct land take from European Sites and ameliorate hydrological change, water pollution, air pollution, noise, vibration and visual disturbance, lighting pollution, the spread of invasive species and pressures arising from improved access to EV charging infrastructure across Ireland enabling additional recreational pressures on European sites.

With the implementation of all mitigation, it can be concluded that implementation of the Plan and its Proposals will not result in any adverse effect on the integrity of any European sites, alone or in-combination.

Appendix A

Statements of Authority

A.1 A.1 Statements of Authority

Sinead Whyte is a chartered environmental scientist, with 24 years' experience in environmental consultancy, and is Environmental Team Lead for Arup Ireland. She has significant experience in the management and delivery of complex, multi-disciplinary projects. She has specialist knowledge in the transport sector and particular experience in the preparation of reports for EIA, SEA and Industrial Emissions Directive licensing. Her portfolio of projects includes College Green Plaza Project, Bus Connects Dublin, Bus Connects Galway, M20 Cork to Limerick Motorway, Irish Cement Alternative Fuels, Blanchardstown Regional Drainage Scheme and Shannon LNG Terminal. Sinead has presented expert witness evidence at numerous An Bord Pleanála oral hearings.

Donncha Madden (Biodiversity Lead) (BSc, MCIEEM, CEcol) is a senior consultant with over 20 years' experience carrying out Ecological Impact Assessment (EcIA). He is an experienced leader (Project Manager) of technical projects including high profile projects and has provided expertise internationally. He holds NIEA licences for a number of protected species and has surveyed habitats and protected species in Northern Ireland for eight years. Donncha has a strong track record in delivering reports to inform AA Screening and full AA Natura Impact Statements on complex projects.

Zak Henderson is an environmental consultant with 1.5 years of experience. Zak is a graduate member of the Institute of Environmental Management and Assessment (IEMA) and the Chartered Institution of Water and Environmental Management (CIWEM). He has experience working across various sectors including renewable energy and town planning for EIA and AA.

Appendix B

Plans, Programmes and Policies for Consideration in In-Combination Assessment

B.1 Plans, Programmes and Policies for Consideration in the In-Combination Assessment

Plan, Programme or Policy	Plan, Programme or Policy Objectives
Strategic National Plans	
National Planning Framework (Project Ireland 2040) – (Government of Ireland) 2019	A planning framework to guide growth, development and investment over the period to 2040. Vision: A shared set of goals for every community across the country, expressed as the National Strategic Outcomes.
National Development Plan 2021- 2030 (Project Ireland 2040) (Department of Public Expenditure and Reform) 2021	The Irish Government's over-arching investment strategy and budget for the period 2021-2030, balancing the demand for public investment across all sectors and regions of Ireland, with a major focus on improving infrastructure projects.
Regional and City Planning	
Regional Strategic Framework for the Central Border Region 2013-2027 (Irish Central Border Area Network) 2013	A Framework for the development of the Central Border Region, produced by both NI and the IE by 10 local authorities from both sides of the border, who worked through their partnership organisation and Cross-Border Group, the Irish Central Border Area Network Ltd. (ICBAN). The framework covers the period from 2013 to 2027, setting out the opportunities and priorities for the region. Vision: *'A sustainable region that delivers the best quality of life for its people and makes a distinctive contribution to economic and social renewal and growth on the island. '*
Regional Development Strategy 2035 (RDS) (Department for Regional Development) 2012	An overarching strategic planning framework to facilitate and guide the public and private sectors, providing a spatial perspective to complement the strategies of other Departments' strategies for Northern Ireland to 2035. Vision: *'An outward-looking, dynamic and liveable Region with a strong sense of its place in the wider world; a Region of opportunity where people enjoy living and working in a healthy environment which enhances the quality of their lives and where diversity is a source of strength rather than division ' .*
Eastern and Midland Regional Spatial and Economic Strategy 2019- 2031 (Eastern and Midland Regional Assembly) 2019	A strategic plan and investment framework to shape the future development of the Region to 2031 and beyond. Vision: *'To create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all ' .*
Northern and Western Regional Spatial and Economic Strategy 2020- 2032 - Northern and Western Regional Assembly 2020	A Strategy to support the implementation of Project Ireland 2040, including the economic and climate policies of the Government, by providing a long-term strategic planning and economic framework for the region. Vision: *'To play a leading role in the transformation of this region into a vibrant, connected, natural, inclusive and smart place to work and live. '*
Southern Regional Spatial and Economic Strategy (Southern Regional Assembly) 2020	A long-term, strategic development framework for the future physical, economic and social development of the region. Vision: *Nurture all our places to realise their full potential;* *Protect and enhance our environment;*

Plan, Programme or Policy	Plan, Programme or Policy Objectives
	Successfully combat climate change; *Achieve economic prosperity & improved quality of life for all;* *Accommodate expanded growth & development in suitable locations; and* *Make the Southern Region one of Europe's most creative, innovative, greenest, and liveable regions.*
Rural Development Policy (Department of Rural and Community Development) 2021	A policy framework for the development of rural Ireland over the next five years Vision: *'A thriving rural Ireland which is integral to our national economic, social, cultural, and environmental wellbeing and development. An Ireland which is built on the interdependence of urban and rural areas. An Ireland which recognises the centrality of people, the importance of vibrant and lived-in rural places, and the potential to create quality jobs and sustain our shared environment.'*
Realising our Rural Potential – Action Plan for Rural - Development (Department of Rural and Community Development) 2017	An action plan to ensure that people who live in rural areas have increased opportunities for employment locally, and access to public services and social networks that support a high quality of life.
Development in the Countryside Call for Evidence (CfE); CfE Emerging Issues; and Consultant's Report (Department for Infrastructure) 2021	Following the publication of the Strategic Planning Policy Statement (SPPS), the DfI issued a 'Call for Evidence' and also procured independent consultants to undertake research and provide an updated evidential context for regional planning policy on development in the countryside. This preparatory work and research helped inform Minister's decision that the current policy approach, provided for by the SPPS, remains appropriate, robust, and fit-for-purpose for the two-tier planning system.
Transport Policies and Strategies	
Trans European Transport Network (TEN-T) Policy – (European Parliament) 2013	A policy to address the implementation and development of a Europe-wide network of railway lines, roads, inland waterways, maritime shipping routes, ports, airports and railroad terminals. Aim: *'To close gaps, remove bottlenecks and technical barriers, as well as to strengthen social, economic and territorial cohesion in the EU.'*
Electrical Vehicle Charging Infrastructure Strategy 2022-2025 (Department of Transport) 2023	This strategy is a pathway for delivery of electric vehicle (EV) charge point infrastructure. Such infrastructure will support the delivery of the Climate Action Plan ambition of almost a million EVs on Irish roads by 2030. The strategy will also help to ensure that EV charge point infrastructure provision remains ahead of demand.
Sustainable and Smart Mobility Strategy (European Commission's Directorate-General for Mobility and Transport 2021)	A strategy setting out a roadmap for a sustainable and smart transport future. It includes 10 focus areas and an action plan, aiming for a 90% reduction in the transport sector's emissions by 2050.
Draft Connecting Ireland (National Transport Authority) 2021	A public transport plan to improve mobility in Ireland's rural areas, by providing better connections between villages and towns, and by linking these areas with an enhanced regional network connecting cities and regional centres. The plan has been updated with feedback from the public consultation that occurred in late 2021.
National Investment Framework for Transport in Ireland (Department of Transport) 2021	The DoT prepared the National Investment Framework for Transport in Ireland (NIFTI) as a high-level strategic framework to support the consideration and prioritisation of future investment in land transport. It represents the Department's contribution to Project Ireland 2040, Government's long-term, overarching strategy to make Ireland a better country for all and to build a more sustainable future. NIFTI has been developed to ensure sectoral investment is aligned with the National Planning Framework (NPF) and supports the delivery of the ten National Strategic Outcomes (NSOs).

Plan, Programme or Policy	Plan, Programme or Policy Objectives
	NIFTI establishes a common lens through which to consider potential investment. In doing so, NIFTI sits alongside other Government priorities and policy objectives, such as the Programme for Government and Climate Action Plan.
Sustainable Mobility Policy (Department of Transport) 2022	The Sustainable Mobility Policy (SMP) was published in April 2022 and includes 91 actions that support behavioural change through a wide range of interventions. These interventions include, among other things, public transport infrastructure and services, active travel promotion and supports, road safety initiatives, legislative measures, research, and public engagement.
Greater Dublin Area Transport Strategy 2022-2042 (National Transport Authority) 2022	The Greater Dublin Area (GDA) Transport Strategy provides framework for further investment in services and infrastructure. A substantial increase in the numbers of people using sustainable and active travel is among the primary objectives of this strategy.
Dublin Local Authority Electrical Vehicle Charging Strategy (2022)	A charging strategy for the four Dublin local authorities to delivery a coordinated approach to deploying the required EV charging infrastructure to support and accelerate the uptake of EVs in the region.
City and Council transport strategies and plan (National Transport Authority)	Transport strategies and plans for the cities and local authority areas across the island. These include the Metropolitan Area Transport Strategies for Cork, Dublin, Galway, Limerick and Waterford.
Investment Plans	
Public Spending Code (Department of Public Expenditure and Reform) 2019	The rules and procedures that ensure that all Irish public bodies treat public funds with care; ensuring the best possible value-for-money when public money is being spent or invested.
National Investment Framework for Transport Investment (Department of Transport) 2021	A framework for considering future transport investment, aligned with key Government policy priorities and commitments, such as the Climate Action Plan and the National Development Plan. Purpose: *'To guide the development of the transport network in the decades ahead to enable the National Planning Framework, and to promote positive social, environmental and economic outcomes throughout the country.'*
Climate and Sustainability Strategies and Plans	
European Green Deal (European Commission) 2020	A strategy to oversee Europe's transformation to a climate-neutral, fair and prosperous society, with a modern, resource-efficient and competitive economy. The strategy will be supported by climate, energy and transport-related legislation under the 'Fit for 55 Package' to meet the 2030 and 2050 ambitions. Target: *'Net-zero greenhouse gas emissions at EU level by 2050, and an emissions reduction target of at least 55% for 2030 to limit warming to 1.5 degrees Celsius and align with the goal of the Paris Agreement.'*
The Paris Agreement (United Nations Climate Change Conference) 2015	A legally binding international treaty on climate change. Its goal is to limit global warming to well below 2, preferably to 1.5 degrees Celsius, compared to pre-industrial levels.
UN Sustainable Development Goals (United Nations) 2015	17 interlinked global goals designed to be a "blueprint to achieve a better and more sustainable future for all", with the aim to end poverty and other deprivations alongside strategies that improve health and education, reduce inequality, and facilitate economic growth – while also tackling climate change and working to preserve oceans and forests.
Climate Action Plan 2024 (Department of the Environment, Climate and Communications) 2024	The Climate Action Plan 2024 (CAP 2024) is the third annual update to Ireland's Climate Action Plan 2019. This plan is the first to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021, and following the introduction, in 2022, of economy-wide carbon budgets and sectoral emissions ceilings. The CAP 2024 implements the carbon budgets and sectoral emissions

Plan, Programme or Policy	Plan, Programme or Policy Objectives
	ceilings and sets out a roadmap for taking decisive action to halve our emissions by 2030 and reach net zero no later than 2050, as committed to in the Programme for Government. The CAP 2024 also sets out how Ireland can accelerate the actions that are required to respond to the climate crisis, putting climate solutions at the centre of Ireland's social and economic development. In relation to the transport sector, the CAP details a 50% reduction in emissions by transforming how we travel. It aims to drive policies to reduce transport emissions by improving town, city and rural planning, and by adopting the Avoid-Shift-Improve approach: reducing or avoiding the need for travel, shifting to public transport, walking and cycling and improving the energy efficiency of vehicles.

Appendix C

Appropriate Assessment Screening

C.1 Appropriate Assessment Screening

1. Introduction

1.1 Overview

As part of the Sustainability Portfolio Services Framework, Ove Arup & Partners Ireland Limited (Arup) has been engaged by Transport Infrastructure Ireland (TII) to carry out Appropriate Assessment (AA) screening of the National Road Network EV Charging Plan (NRNEVCP) (the 'Plan'), being prepared by Zero Emission Vehicles Ireland (ZEVI).

The Plan provides a pathway for delivery of electric vehicle (EV) en-route charging infrastructure in Ireland, in line with both national and European climate targets for a cleaner transportation sector. This pathway has examined a set of commitments on investment, regulation and required policy instruments required over the coming years to remove barriers to the adoption of passenger cars, light duty vehicles (LDVs) and heavy good vehicles (HGVs).

This AA Screening Report has been prepared to provide information for the 'public authority', regarding the potential for 'Likely Significant Effects' (LSE) of the final proposals from plan, on European sites within the Zone of Influence (ZoI) of the proposals.

1.2 Legal Drivers

The requirement for "Appropriate Assessment" is set out in Articles 6(3) and 6(4) of the Habitats Directive (92/43/EEC), which is transposed into Irish law by the *European Communities (Birds and Natural Habitats) Regulations 2011 (as amended)* S.I 477/2011 (hereafter referred to as the Habitats Regulations).

A key requirement of the Habitats Directive is that the effects of any plan or project, which is not directly connected with or necessary to the management of a European site, but which alone, or in combination with, other plans or projects, are likely to have a significant effect on a European site, should be assessed before any decision is made to allow that plan or project to proceed.

This report has been prepared in accordance with the Habitats Regulations and assessed the Plan proposals to determine if there are LSEs either individually or in combination with other plans or projects, on a European site.

1.3 Statements of Authority

Sinead Whyte is a chartered environmental scientist, with 24 years' experience in environmental consultancy, and is Environmental Team Lead for Arup Ireland. She has significant experience in the management and delivery of complex, multi-disciplinary projects. She has specialist knowledge in the transport sector and particular experience in the preparation of reports for EIA, SEA and Industrial Emissions Directive licensing. Her portfolio of projects includes College Green Plaza Project, Bus Connects Dublin, Bus Connects Galway, M20 Cork to Limerick Motorway, Irish Cement Alternative Fuels, Blanchardstown Regional Drainage Scheme and Shannon LNG Terminal. Sinead has presented expert witness evidence at numerous An Bord Pleanála oral hearings.

Donncha Madden (Biodiversity Lead) (BSc, MCIEEM, CEcol) is a senior consultant with over 17 years' experience carrying out Ecological Impact Assessment (EcIA). He is an experienced leader (Project Manager) of technical projects including high profile projects and has provided expertise internationally. He holds NIEA licences for a number of protected species and has surveyed habitats and protected species in Northern Ireland for eight years. Donncha has a strong track record in delivering reports to inform AA Screening and full AA Natura Impact Statements on complex projects.

Zak Henderson is an environmental consultant with 1.5 years of experience. Zak is a graduate member of the Institute of Environmental Management and Assessment (IEMA) and the Chartered Institution of Water and Environmental Management (CIWEM). He has experience working across various sectors including renewable energy and town planning for EIA and AA.

2. National Road Network EV Charging Plan – Overview

2.1 Overview

Ireland has recognised that EVs represent a key component of reducing carbon emissions within the transport sector. In response to the widespread adoption of EVs in Ireland, a comprehensive charging infrastructure network that is accessible, reliable and convenient for all drivers is required to accommodate 30% of the private car fleet to be electrified by 2030.

As of 2023, there is an existing network of publicly accessible EV charging stations of over 2,195 public charging points across the country. The deployment of en-route charging infrastructure requires consideration of charging station locations, available electricity grid capacity, suitable service operation business models and the level of funding required to support deployment, especially in remote areas. In March 2023, the European Commission drafted the Alternative Fuels Infrastructure Regulation (AFIR) which establishes technical and operational requirements for EV charging infrastructure. These include mandatory deployment targets along the Trans-European Transport Network (TEN-T), the need for interoperability between different charging networks, accessibility for all users, and information provision for users on the availability and location of charging infrastructure. Some specific requirements involve:

- Having charging pools of 600kW for LDVs at 60km intervals in both directions by 2035; and
- Dedicated charging pools for HDVs of 3,600kW at 60km intervals in both directions on the core network and 1,500kW at 60km in both directions on the comprehensive network by 2030.

The Plan establishes the framework to satisfy the objectives of the AFIR and deliver the necessary en-route infrastructure for Ireland to meet the decarbonisation targets laid out in the Climate Action Plan (CAP) 2024. In drawing on lessons from international experience, the Plan encompasses the best practices whilst avoiding pitfalls to deliver efficient and effective implementation. This exercise allowed ZEVI to establish a coordinated approach with relevant stakeholders including state agencies, local authorities, road users, public transport providers and the freight and logistics sector, service area and charge point operators, ESBN and EirGrid to set clear targets to deliver a future-proofed network of high-power EV charging infrastructure.

However, to fully understand the requirements of implementing the Plan, an overview of the existing National Road Network and the electric mobility market in Ireland is provided. The TEN-T road network in Ireland consists of several categories of roads including motorways, dual carriageways and other primary roads totalling 500km of Core network and 1,700km of comprehensive network. Refer to Figure 1 for an overview of the TEN-T road network in Ireland. At the end of 2022, there were approximately 73,576 total electric vehicles in Ireland which represented a 57% increase from the previous year. Currently, the majority of EV charging points have the capacity to charge an EV to 80% in 20-30 minutes and are strategically located in service areas on motorways or on the major national road network. Figure 2 below illustrates the current EV charging network in Ireland respectively.

Figure 5 Ireland's National Road Network | Source: National Road Network EV Charging Plan 2024-2030, Figure 16.

Figure 6 Current EV charging infrastructure on the National Road Network | Source: National Road Network EV Charging Plan 2024-2030, Figure 6

To facilitate the implementation of the required infrastructure, different modelling methodologies and scenario analysis were undertaken to inform the Plan. These assessments, together with the AFIR requirements provide key insights to accelerate the delivery of en-route charging infrastructure.

2.2 Plan Proposals

The modelling methodologies and scenario analysis informed the development of a set of principles, support options and indirect measures necessary for the implementation of the Plan. Within the Plan a total of 35 sections of text have been identified by the AA team which could be considered proposals arising from the Plan. These are not necessarily clearly identified within the Plan as a discrete set of proposals; however the AA team has considered that AA screening is required on these 35 "proposals" as all other material in the plan is either introductory, expositional in nature or is non-relevant technical detail such as modelling and analysis of need. These proposals are given sequential numbering in this AA Screening but this is solely for the purposes of this assessment.

2.3 Timeframe

The timeframe of the Plan covers the period from 2024 to 2030 to facilitate the delivery of the necessary infrastructure to support the uptake of EVs in Ireland. The Plan provides three alternative scenarios to guide development of the EV charging network in Ireland to 2025 and 2030 to comply with Ireland's transportation decarbonisation targets.

2.4 Future En-route Charging Network

As noted in Section 2.1, there are specific requirements for the EV charging network that must be in place before 2035 including:

- Having charging pools of 600kW for LDVs at 60km intervals in both directions by 2035 and
- Dedicated charging pools for HDVs of 3600kW at 60km intervals in both directions on the core network and 1500kW at 60km in both directions on the comprehensive network by 2030.

The proposals listed in Section 5 are intended to facilitate the development of the EV network to satisfy these objectives within the timeline of the Plan.

3. Appropriate Assessment Process

3.1 AA Process

The AA process involves a number of steps and tests that need to be applied in sequential order. Screening for AA is the first step in this process.

An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required. The four stages are shown in Figure 3. Stages 1 and 2 deal with the main requirements for assessment under Article 6(3) of the Habitats Directive. Stage 3 may be part of Article 6(3) or may be a necessary precursor to Stage 4. Stage 4 is the main derogation step of Article 6(4).

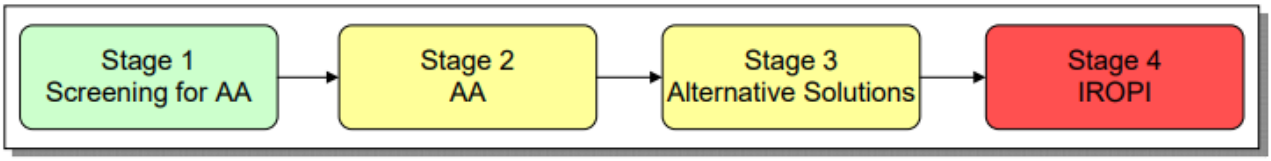

Figure 3 Stages in the AA Process.[17]

3.2 Definitions

European sites (sometimes referred to as Natura 2000 sites) are part of the Natura 2000 network and include those designated as Special Areas of Conservation (SACs), Candidate SACs, Special Protection Areas (SPAs) or Candidate SPAs.

SACs are selected for the conservation of Annex I habitats (including priority types which are in danger of disappearance) and Annex II species (other than birds). SPAs are selected for the conservation of Annex I birds and all migratory birds and their habitats.

The Annex habitats and species, for which each site is selected, are the *qualifying interests* (QI) for SACs and *special conservation interests* (SCI) for SPAs of each site. *Conservation objectives* for the site are defined for these QI.

3.3 Relevant Guidance

This document has been prepared with regard to the following guidance documents:

- Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPWS 1/10 and PSSP 2/10.

European Commission Environment Directorate-General [hereafter referred to as MN 2000], Managing Natura 2000 sites: The Provision of Article 6 of the Habitats Directive 92/43/EEC (2000).

- European Commission Environment Directorate-General. Assessment of Plans and Projects Significantly Affecting Natura 2000 sites: Methodical Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (2021).

European Commission Guidance Document on Article 6(4) of the Habitats Directive 92/43/EEC (2007).

- European Commission. Communication from the Commission on the precautionary principle (2000).

Guidelines for Good Practice Appropriate Assessment of Plans under Article 6(3) Habitats Directive (International Workshop on Assessment of Plans under the Habitats Directive, 2011).

Office of the Planning Regulator Practice Note PN01 – Appropriate Assessment Screening for Development Management (2021).

- Department of Environment, Heritage and Local Government. Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2010 revision).

3.4 Data Sources

The ecological data reviewed to inform this document comprises:

- National Parks and Wildlife Service (NPWS) Designations web viewer[18]

[17] Department of Environment, Heritage and Local Government (2009) Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities (2010 Revision).

[18] https://dahg.maps.arcgis.com/apps/webappviewer/index.html?id=8f7060450de3485fa1c1085536d477ba accessed June 2023

4. European Sites Under Consideration

4.1 SPA and SAC Distribution

The proposals which provide a route to achieving the Plan have a national scale of application and are targeted at facilitating a shift to low-carbon transportation alternatives across Ireland. This requires the expansion of the existing charging infrastructure network through the deployment of en-route charging infrastructure to accommodate the projected uptake of EVs in Ireland.

No new developments would take place as a direct result of the Plan's proposals, however, the location, design, scale and form of development throughout Ireland may be influenced by proposals presented in the Plan.

In total, there are 165 SPAs and 441 SACs in Ireland. Figure 4 shows the location of all SACs and SPAs across Ireland.

Guidance documents provide proposed criteria to determine if a proposal is likely to have significant effects on designated sites. These criteria are particularly suited to screening individual projects, as detail on the receiving environment is available for analysis when project locations are known.

4.2 European Sites Under Consideration

A comparison between Figure 1 and Figure 4 shows an overlap with Ireland's road network and the network of Natura 2000 sites in Ireland. Therefore, the proposed EV charging network is located within proximity to European sites. It is not possible to determine LSE of the Plan at the granular level as the Plan proposals are set at a national scale.

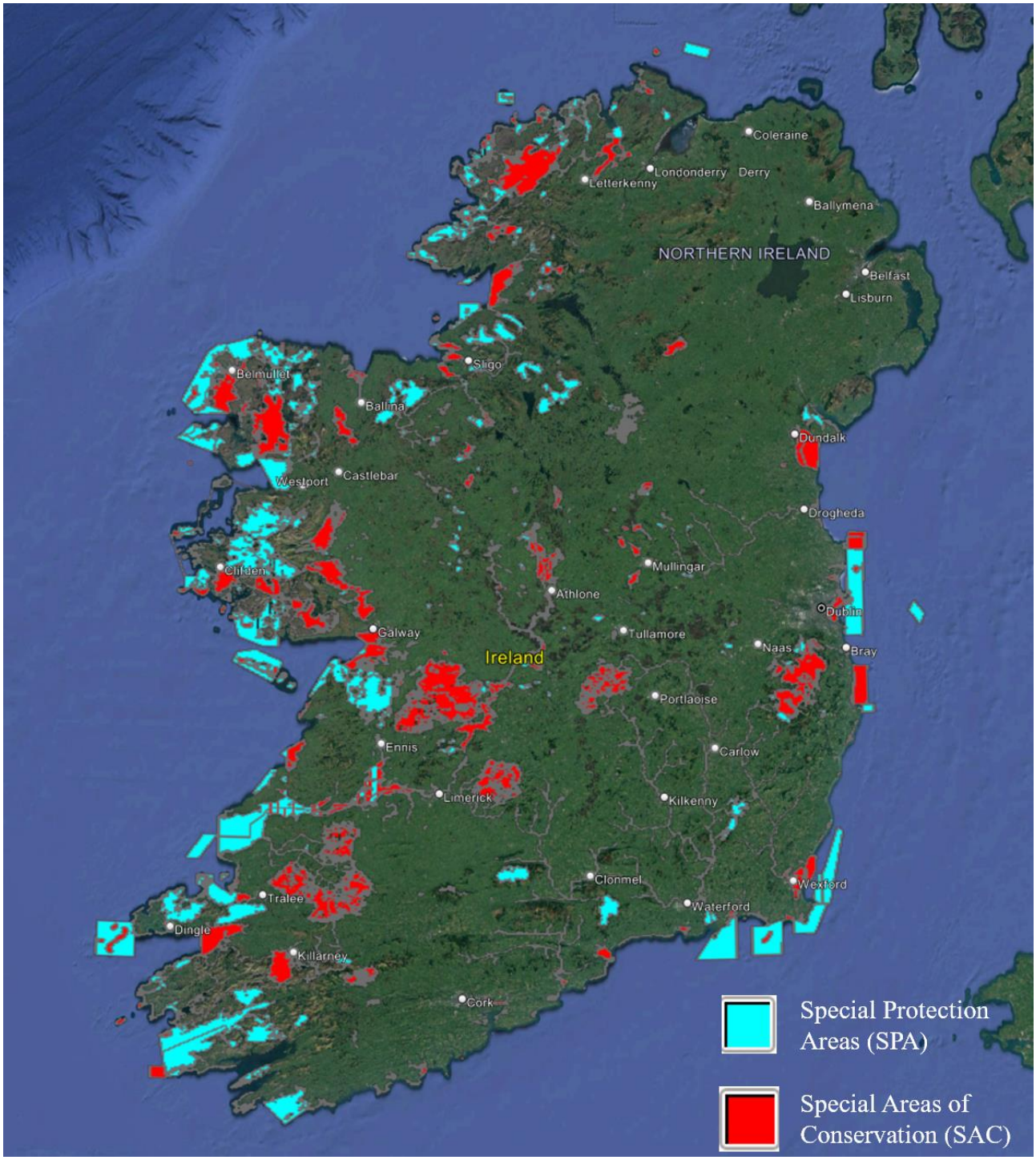

Figure 4 Natura 2000 Network in Ireland

5. Consideration of any Likely Significant Effects (LSE) on European Sites

The process of screening for AA focuses on any interaction between SPA/SAC conservation objectives and the effects of implementing the Plan proposals.

Since the proposed proposals are national in their application and are limited in scale and detail, the discussion of the likelihood of any significant effects is high-level.

The potential ZoI of the consequences of implementing the proposals would be expected to be limited to areas shown in Figure 1. This will also include a surrounding buffer, (and potential hydrological connections), dependent on the context of the proposal. It is possible that these areas may overlap or be within proximity to European Sites, through direct/indirect connectivity and possibly functionally linked.

Table C.1 provides a high-level summary of the Plan proposals, and screening of each proposal for AA. The proposals were categorised with reference to the pre-screening categories within DTA Publication Ltd. (2023)[19].

Pathways for effect may include the following:

- Construction of new transport infrastructure directly within or in proximity to European sites
- Functionally linked habitat
- Hydrological changes
- Air quality
- Noise
- Lighting
- Additional recreational pressure

[19] DTA Publications: The Habitats Regulations Assessment Handbook. Available by subscription at: www.dtapublications.co.uk (Accessed June 2023).

Table C.1 Summary of Screening for AA, of the Plan Proposals

1	The current status of network capacity shows a direct need for reinforcement at 38 kV and MV level, to be able to accommodate the intended development and deployment of public EV recharging infrastructure. (pg. 43)	No	*Policies or proposals that cannot lead to development or other change.* The proposal does not itself lead to development. Whilst it focuses on the need for grid reinforcement, the proposal is topic specific to analysing the current status of the network capacity. Proposals 10, 12, 13, 14 and 26-35 have been scoped in to Stage 2 AA and provide greater detail about the Plan's geographic distribution.
2	Prioritise and enhance private sector participation: The important role of the existing private sector companies who are providing fuelling, charging and ancillary services is recognised. In this regard, interventions will be designed to ensure the continued vitality of the private sector and promote a self-sustainable high power enroute EV charging market. (pg. 46)	No	*Policies or proposals that cannot lead to development or other change.* The proposal does not itself lead to development. Whilst it relates directly to the promotion of the EV charging market, the proposal is topic specific to stakeholder involvement and supply chain management.
3	Sustainability first: Upgrade of existing facilities and infrastructure will be prioritised to minimise the carbon emissions associated with new construction in line with sustainable development principles. Interventions which are aligned with Climate Action policies and avoid increasing vehicle kilometres will be viewed more favourably. (pg. 46)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal seeks to upgrade existing facilities and infrastructure to reduce the embodied carbon of the required infrastructure upgrades. However, whilst the proposal focuses on built-up aspects of the environment, there remains a potential for effect on European sites that exist within the potential ZoI of the Ireland TEN-T road network. These works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage, a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites.
4	Alignment with wider policy and other network goals: The interventions will support: the State's overall decarbonisation goals; the National Planning Framework (and associated National Strategic Outcomes including sustainable mobility, enhanced regional accessibility, transition to a low carbon and climate resilient society); and consider alignment with ESBN and EirGrid's electricity network strategies. Interventions will seek to avoid encouraging over concentration of providers of enroute charging facilities on the national road network. (pg. 46)	No	*Policies or proposals that cannot lead to development or other change.* The proposal does not itself lead to development. Whilst it focuses on dispersing EV charging technology away from an over-concentrated approach, the proposal is topic specific to supporting the State's decarbonisation goals. Proposals 10, 12, 13, 14 and 26-35 have been scoped in to Stage 2 AA and provide greater detail about the Plan's geographic distribution.
5	Customer experience and equity: Interventions will seek to provide a best-in-class customer experience to all users to ensure a positive perception of EV charging infrastructure provision and further facilitate the EV transition. This includes coverage across Ireland to ensure equitable distribution ensuring connectivity across urban, rural and end of routes. (pg. 46)	No	*Policies or proposals that cannot lead to development or other change.* The proposal does not itself lead to development. Whilst it focuses on equitable EV charging coverage across Ireland, the proposal is topic specific to supporting customer experience and equity. Proposals 10, 12, 13, 14 and 26-35 have been scoped in to Stage 2 AA and provide greater detail about the Plan's geographic distribution.

6	Enhance and facilitate innovation: New and innovative technologies that further accelerate the roll-out of appropriate EV charging infrastructure will be encouraged coupled with the use of data to inform decision making. (pg. 46)	No	*Policies or proposals that could not have any conceivable adverse effect on a site.* The implementation of this proposal does not have any causal connection or link with qualifying features of European sites. Whilst it relates directly to the prioritising new and innovative EV charging infrastructure, the proposal is topic specific to ancillary technology and utilises data to inform decision making.
7	Resource efficiency: Interventions will seek to facilitate efficient use of private and public resources. (pg. 46)	No	*Policies or proposals that could not have any conceivable adverse effect on a site.* The implementation of this proposal does not have any causal connection or link with qualifying features of European sites. The proposal does not influence the scope of development required to implement the Plan.
8	Unblock potential barriers by facilitating and progressing grid upgrade enabling works to streamline the process for the private sector companies to access the required grid power/ connections required for high powered charging sites. This is consistent with 'Resource Efficiency' where 'build once for 2040' approach will avoid piecemeal grid upgrades which are resource inefficient. These enabling works should significantly reduce the overall project delivery time for enroute high power EV charging installation. (pg. 47)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal seeks to identify and facilitate grid upgrade enabling works to streamline access to the required power connections to implement the Plan. European sites exist within the potential ZoI of the Irish road network. These enabling works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites.
9	In such cases that it becomes clear (via evidence) that a market gap (i.e. insufficient enroute high power charging infrastructure to meet AFIR and/ or forecast market demand) cannot or will not be addressed by the above mentioned options, more direct public intervention measures may be considered to facilitate delivery. This may include: insufficient private sector appetite for the provision of specific charging infrastructure for certain vehicle types or at certain locations/ sections of the national road network; demand/ supply analysis; market consultations; other evidence. Such interventions may take the form of direct government investments, public private partnerships, or other appropriate means. (pg. 47)	No	*Policies or proposals that cannot lead to development or other change.* The proposal does not itself lead to development. Whilst it relates directly to potential market gaps arising, the proposal is topic specific to financial investments that may be required to overcome these gaps.
10	Locations are to be considered according to the following order of priority for each option: TEN-T core network Arterial; TEN-T comprehensive (Motorway/Dual Carriageway); TEN-T comprehensive single-carriageway primary road network; and Non TEN-T national primary and secondary road network. (pg. 48)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal seeks to identify locations along the Irish road network that are to be prioritised to implement the Plan. European sites exist within the potential ZoI of the Irish road network. These works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites.

11	Further, while designing the geographical reach of possible options, compliance with national and international policies and regulations will be taken into account. (pg. 48)	No	*Policies or proposals that cannot lead to development or other change.* The proposal states that it will comply with national and international policies and regulations. Therefore, it is not a proposal that has the potential to influence development in such a way as to generate a likely significant effect on European sites.
12	Further, while designing the geographical reach of possible options, coverage of urban nodes and other key network nodes to ensure infrastructure availability in high traffic routes and for cross over traffic are likely to be taken into account. (pg. 48)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal seeks to ensure infrastructure availability in urban nodes and other key network nodes in areas of high traffic. European sites exist within the potential ZoI of the Irish road network. These works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites.
13	Further, while designing the geographical reach of possible options, maximum coverage of national road network including regional and rural areas, ensuring connectivity and end of routes are well served is likely to be taken into account. (pg. 48)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal seeks to ensure the network of regional, rural and end of routes are well served by EV charging infrastructure. European sites exist within the potential ZoI of the Irish road network. These works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites.
14	Further, while designing the geographical reach of possible options, coverage of tourist / seasonal spots adjacent to the national primary and secondary road network is likely to be taken into account. (pg. 48)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal seeks to ensure that tourist and seasonal spots adjacent to the national primary and secondary road network are served by EV charging infrastructure. European sites exist within the potential ZoI of the Irish road network and particularly around tourist and seasonal spots. These works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites.
15	Further, while designing the geographical reach of possible options, facilitating and supporting key economic sectors including: fleet; trade; business; commuter; and leisure is likely to be taken into account. (pg. 48)	No	*Policies or proposals that cannot lead to development or other change.* The proposal does not itself lead to development. Whilst it focuses on the facilitation of key economic sectors within the Plan, it is topic specific towards the potential users of the network. The proposal notes the support of the leisure sector in the Plan. Proposal No. 20 has been scoped in to Stage 2 AA and provides greater detail about the geographic reach required to facilitate the tourism and leisure sector.

16	Any scheme ZEVI will implement must be in compliance with EU state aid rules. (pg. 49)	No	*Policies or proposals that cannot lead to development or other change.* The proposal does not itself lead to development. Whilst it focuses on the schemes ZEVI will implement, it is topic specific in ensuring that these schemes will be compliant with EU state aid rules which will ensure compliance with the Habitats Regulations.
17	All expenditure will be in compliance with the Public Spending Code. (pg. 48)	No	*Policies or proposals that cannot lead to development or other change.* The proposal does not itself lead to development. Whilst it focuses on the expenditure required to implement the Plan, it is topic specific in ensuring that it all will be in compliance with the Public Spending Code.
18	As indicated in the 2022-2025 EV Charging Infrastructure Strategy, ZEVI has been working on developing a set of Universal Design Guidelines for charging infrastructure. The aim of these guidelines is to make electric vehicle charging stations accessible to all users. The guidelines summarise key considerations when installing electric vehicle charging stations, including the design of the charging station, accessibility of the site, and information and communications to inform users before, during, and after a charging session. This document has been published for public consultation in July 2023 . (pg. 51)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal seeks to ensure that all charging infrastructure remains accessible to all users. The Universal Design Guidelines for charging infrastructure will influence the design and implementation of charging sites throughout Ireland. European sites exist within the potential ZoI of the Irish road network. These works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites.
19	Currently ZEVI (in consultation with stakeholders) is working on a Data Strategy with the aim of publishing it by January 2024. This Data Strategy has been prepared to represent Ireland's response to the impending AFIR directive on the management and distribution of current and projected data demands within the EV ecosystem. The aim of the strategy is to help ensure that people, businesses, and organisations trust the data ecosystem being developed and that can get access to data when they need it. The strategy outlines the need to establish an EV Data Hub System to ensure a trusted and consistent single source of truth for all actors in the EV ecosystem. (pg. 51)	No	*Policies or proposals that cannot lead to development or other change.* The proposal does not itself lead to development. Whilst it focuses on the creation of a Data Strategy, it is topic specific in providing a data system for users to access information relating to the EV network.
20	While the market may dictate additional connectors, charging points for light-duty vehicles will be equipped (at least) with Type 2 connectors for AC connections and Combo 2 connectors for DC connections. Future innovations, such as wireless charging, will also be required to comply with minimum technical specifications. (pg. 51)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal seeks to outline the types of charging connections required at each location which in turn will influence the design of the required grid connection developments to support the Plan. European sites exist within the potential ZoI of the Irish road network. These works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites

21	All new public charge points installed after the Alternative Fuels Infrastructure Regulation comes into force (expected to be in 2023), will be required to accept card payments by means of a contactless facility for charge points with capacity over 50kW and for charge-points with capacity below this to, at minimum, enable a QR code payment system. (pg. 52)	No	*Policies or proposals that cannot lead to development or other change.* The proposal does not itself lead to development. Whilst it focuses on ensuring that all charge points will accept card payments, it is topic specific on payment technology.
22	From 1 January 2027 onwards, charge point operators shall ensure that all publicly accessible charging points operated by them (and that have a power output equal to or more than 50 kW) can accept card payments. (pg. 52)	No	*Policies or proposals that cannot lead to development or other change.* The proposal does not itself lead to development. Whilst it focuses on ensuring that all charge points will accept card payments, it is topic specific on card payment technology.
23	Charge point operators will clearly display their prices, as well as comparison costs for other fuels. As a result, this information is known to end users before they initiate a charging session. Pricing will be non-discriminatory. (pg. 52)	No	*Policies or proposals that could not have any conceivable adverse effect on a site.* The proposal has no causal connection or link between implementation and the qualifying features of European sites . The proposal focuses on how the information is displayed on charge point operators.
24	From one year after AFIR comes into force, all new public charge points (installed from that point onwards) will be required to be enabled for smart charging. This will enable future Vehicle-to-Grid operations and other system services and efficiencies such as electricity-demand regulation. (pg. 52)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal seeks to enable future Vehicle-to-Grid operations which will influence the types of grid infrastructure development required for the implementation of the Plan. European sites exist within the potential ZoI of the Irish road network. These works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites
25	Other standards related to design of infrastructure elements related to EV charging infrastructure along national roads may need to be updated to reflect new requirements. Some examples may include TII's DN-GEO-03028 "The Location and Layout of On-line Service Areas" or the Traffic Signs Manual. (pg. 52)	No	*Policies or proposals that cannot lead to development or other change.* The proposal notes that existing standards relating to EV charging infrastructure may need to updated to reflect new requirements. The updating of any standards relating to design of EV charging infrastructure in itself is unlikely to lead to any likely significant effects on European sites.

26	For passenger/LDV charging, three alternatives for the delivery of en-route infrastructure for passenger/LDV for 2025 and 2030 are outlined (See Table 11 and Table 12 of the Plan). At minimum, Alternative 1 must be delivered in order to meet ARIR's specific TEN-T road network requirements. However, results of analysis show that more than this is needed, in order to deliver AFIR's fleet-based targets and also to be ahead of the needs of EV drivers. Therefore, the target will be to deliver Alternative 2 and if possible Alternative 3 specifically in those areas of higher demand. (pg. 54)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal establishes three alternative pathways towards implementing the EV charging network by 2025 and 2030. From an environmental perspective, Alternative 3 represents the worst case scenario due to a higher requirement of supporting EV charging infrastructure in both stages and will therefore be assessed. European sites exist within the potential ZoI of the Irish road network. These works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites
27	By 2025, for 15% of the TEN-T Core & Comprehensive (Figure 1) 1400kW every 120km in each direction will be provided with at least one charge point with 350kW. (pg. 56)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal seeks to deliver specific electrical grid upgrades throughout the Irish road network to supplement the delivery of the Plan. European sites exist within the potential ZoI of the Irish road network. These works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites
28	By 2025, at Urban Nodes (Dublin, Cork, Foynes and Galway), 900kW will be provided by stations with an individual power output of 150kW. (pg. 56)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal seeks to deliver electrical upgrades to the existing grid infrastructure within urban nodes to support the delivery of the EV charging network. European sites exist within the potential ZoI of the Irish road network. These works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites
29	By 2027, 50% of the TEN-T Core will have 2800kW every 120km in each direction with at least two charge points with 350kW. (pg. 56)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal seeks to deliver specific electrical grid upgrades throughout the Irish road network to supplement the delivery of the Plan. European sites exist within the potential ZoI of the Irish road network. These works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites

30	By 2027, 50% of the TEN-T Comprehensive will have 1,400kW in each direction, with at least one charge point with 350kW. (pg. 56)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal seeks to deliver specific electrical grid upgrades throughout the Irish road network to supplement the delivery of the Plan. European sites exist within the potential ZoI of the Irish road network. These works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites
31	By 2027, at each HDV parking and rest areas dedicated to overnight parking, 2 recharging stations dedicated to heavy-duty vehicles with a minimum 100kW each will be provided. (Note: Ireland do not have any such sites at present). (pg. 56)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal seeks to deliver electrical upgrades to overnight parking areas to support the delivery of the plan. European sites exist within the potential ZoI of the Irish road network. These works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites
32	By 2030, the TEN-T Core will have 3600kW in each direction with at least two stations with 350kW each. (pg. 56)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal seeks to deliver specific electrical grid upgrades throughout the Irish road network to supplement the delivery of the Plan. European sites exist within the potential ZoI of the Irish road network. These works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites
33	By 2030, the TEN-T Comprehensive will have 1500kW every 100km in each direction with at least one station at 350kW. (pg. 56)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal seeks to deliver specific electrical grid upgrades throughout the Irish road network to supplement the delivery of the Plan. European sites exist within the potential ZoI of the Irish road network. These works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites

34	By 2030, at each safe and secure parking area, 4 recharging stations will be provided which are dedicated for heavy-duty vehicles (minimum 100kW each) (Note: Ireland do not have any such sites at present). (pg. 56)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal seeks to deliver electrical upgrades to overnight parking areas to support the delivery of the plan. European sites exist within the potential ZoI of the Irish road network. These works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites
35	By 2030, 1800kW will be provided by stations with an individual power output of 150kW in Urban Nodes. (pg. 56)	Yes	*Policy or proposal which may have a likely significant effect on a site alone.* The proposal seeks to deliver electrical upgrades to the existing grid infrastructure within urban nodes to support the delivery of the EV charging network. European sites exist within the potential ZoI of the Irish road network. These works may impact on European sites indirectly, depending on potential pathways for effect relating to construction. At this stage a precautionary approach is taken, and it is not possible to rule out this proposal from resulting in a likely significant effect on European sites

6. Consideration of In Combination Effects

The assessment in Section 5 determines if the Plan proposals, in the absence of mitigation, will have any LSE on the European sites 'alone.'

Where screening concludes that significant effects are likely (alone or in combination), or that sufficient uncertainty remains, then that potential effect will be taken forward to AA.

When considering in combination effects, the following should be taken account of:

- Projects completed
- Projects approved but not started or uncompleted
- Projects proposed, i.e. For which an application for approval or consent has been made, including refusals subject to appeal and not yet determined
- Proposals in adopted plans and
- Proposal in finalised plans formally published or submitted for consultation or adoption.

The Plan proposals are set at a national level and are limited in scale and detail; therefore no information is provided of any infrastructure development proposals including their design, specific location or timescales for construction. In some cases, an indication of specific towns and road networks is provided, however in the absence of further granular information this is insufficient to provide an assessment of impacts.

For European sites where no LSE as a result of the proposal are concluded, the potential exists for in-combination effects with other plans or projects. However, without detailed information relating to individual project proposals and timescales, it is not possible to predict which other plans and projects will be relevant to such a future project assessment. Furthermore, where LSE have been ruled out from proposals, they have been ruled out alone with no residual effect or credible pathway for effect, i.e., they could not have any conceivable adverse effect on a site.

Subsequently, the in-combination assessment is taken forward to AA where potential for in combination effects may be considered alongside mitigation measures which may be required.

7. Conclusion

The purpose of this AA Screening report is to provide the relevant information to the public authority (the Department of Transport) to inform of the potential for Likely Significant Effects and therefore the potential need for Stage 2 AA, pursuant to the Habitats Regulations as defined in Section 1.2. Whilst the plan does not have a set list of proposals there are paragraphs within the document which could be considered as such and therefore are considered as proposals for the purposes of this AA Screening document.

The key results of the AA Screening undertaken are summarised below:

- Following an analysis of the Plan and its resulting proposals, LSE can be ruled out with no residual effects for 16 proposals.
- LSE alone cannot be ruled out for 19 proposals. This is a result of the nature of developments that may occur, the potential relationship with European sites that may result, considering other plans and projects, and applying the precautionary principle.

Consequently, **these Plan proposals have the potential to result in LSE on European sites**. It should be noted that this view is based on a worst-case scenario whereby the Plan proposals may inform certain layouts of infrastructure development, or increase the likelihood that development that may be close to or within European sites.

- Whilst it is likely that implementation of the proposals will include measures to mitigate LSE on European sites, and may promote development layout and design that may actually protect European sites, such measures cannot be taken into account at the screening stage as they could be interpreted as being mitigation measures relevant to the European site.