

Strategic Environmental Assessment Screening Report

For
**Climate Change Adaptation Strategy for Louth County
Council**

*Determination of the need for a Strategic Environmental
Assessment for Louth County Council Climate Change
Adaptation Strategy prepared under the National Climate
Change Adaptation Framework*

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ON BEHALF OF
Climate Action Regional Office (CARO)

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1 INTRODUCTION

1.1 Background

The Earth's Climate is changing. While natural fluctuations in climate are considered normal, emerging research and observational records from across the world show rates of change that are far greater than those experienced in recent history. Global temperatures have risen and are projected to rise further bringing changes in weather patterns, rising sea levels and increased frequency and intensity of extreme weather. Ireland's climate is changing in line with global patterns and these changes are bringing significant and wide ranging economic, environmental and social impacts.

Climate change is now recognised as a global challenge with policy responses required in terms of both mitigating the causes of climate change and in adapting to the now inevitable consequences of our changing climate. Action at local level is vitally important to help reduce the risks and impacts of climate change across communities.

This local authority Climate Change Adaptation Strategy forms part of Ireland's national strategy for climate adaptation as set out in the National Adaptation Framework (NAF) which was produced under the provisions of the Climate Action and Low Carbon Development Act 2015.¹

It is tasked with mainstreaming climate change adaptation over time into all functions, operations and services of the local authority. It seeks to inform or 'climate proof' existing plans and policies produced and implemented by the local authority. This ensures a considered, consistent and coherent approach, facing head-on the challenges of a changing climate. Crucially, it also helps in building resilience within the local authority organisation itself as well as across all communities.

2 LEGISLATIVE CONTEXT

2.1 Strategic Environmental Assessment

A Strategic Environmental Assessment (SEA) is the formal, systematic evaluation of the likely significant environmental effects of implementing a plan or program, or variation to a plan or program, before a decision is made to adopt it. The SEA Directive² requires, inter alia, that SEA is undertaken for certain plans, programs or variations to these.

The SEA Directive has been transposed into Irish law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. 435 of 2004) and The Planning and Development Strategic Environmental Assessment (SEA) Regulations 2004 (S.I. 436 of 2004). These Regulations have since been amended by the European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011 (SI No. 200 of 2011) and the Planning and Development (SEA) (Amendment) Regulations 2011 (SI No. 201 of 2011). The criteria as set out in Annex II of The SEA Directive (Directive 2001/42/EC) on the assessment of the effects of certain plans and programmes on the environment and as also set out in Schedule 2A of the Planning and Development (SEA) Regulations 2004 (S.I. No. 436 of 2004) need to be considered while drafting of the Climate Change Adaptation Strategies.

¹ *Climate Action and Low Carbon Development Act 2015* (S.I. No. 25/2016). Available at <http://www.irishstatutebook.ie/eli/2015/act/46/enacted/en/htm>

² Directive 2001/42/EC of the European Parliament and of the Council of Ministers, of 27th June 2001, on the Assessment of the Effects of Certain Plans and Programmes on the Environment

This SEA screening report is consistent with the process as recommended by the Environmental Protection Agency (EPA) publication entitled *Development of Strategic Environment Assessment (SEA) Methodologies for Plans and Programmes in Ireland – Synthesis Report 2003*, specifically Stage 1 (Screen of Plans and Programmes) and furthermore uses the criteria for SEA screening criteria set out in the SEA Directive.

An Appropriate Assessment Screening Report is also being prepared for this Climate Change Adaptation Strategy in line with Article 6(3) of the EU Habitats Directive (92/43/EEC).

2.2 Climate Change Adaptation

2.2.1 International Context

The **United Nations Framework Convention on Climate Change (UNFCCC)** is an international environmental treaty adopted in May 1992. The framework's objective is "*to stabilize greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system*". The framework did not set binding limits on greenhouse gas emissions and contained no enforcement mechanisms. However, the framework outlined how specific international treaties may negotiate further action towards its key objective. **The Paris Agreement 2015** is a protocol set within the context of the UNFCCC (ratified by Ireland on 4th November 2016) and it is aimed at:

- Limiting global warming to less than 2⁰C above pre-industrial level and pursuing efforts to limit the temperature increase to 1.5⁰C.
- Building resilience and increasing the ability to mitigate the impacts of climate change.

The agreement states the need for Parties to formulate and implement National Adaptation Plans.

2.2.2 EU Context

The 2013 EU Strategy on Adaptation to Climate Change encouraged all Member states to adopt comprehensive adaptation strategies. It sought better informed decision making through the identification and addressing of gaps in knowledge about adaptation. The European Climate Adaptation Platform Climate-ADAPT, was developed as a resource mechanism to help users access and share information on adaptation.

The Global Covenant of Mayors for Climate and Energy is a voluntary, bottom up, approach for cities and local governments to combat Climate Change and move towards a low emission, resilient society. The Global Covenant of Mayors for Climate and Energy brought the Compact of Mayors and the EU Covenant of Mayors under one international body in January 2017 incorporating over 9,000 cities and local governments.

2.2.3 National Context

The 2012 National Climate Change Adaptation Framework (NCCAF) was Ireland's first step in developing a national policy on adaptation actions to combat the impacts of climate change.

The National Policy Position on Climate Action and Low Carbon Development 2014 restated the policy position of the NCCAF, 2012. Greenhouse gas mitigation and adaptation to the impacts of climate change were to be addressed in parallel national plans under an evolving climate policy to 2050.

The Climate Action and Low Carbon Development Act 2015 was a landmark national milestone in the evolution of climate change policy in Ireland. It provides the statutory basis for the national transition objective laid out in the National Policy Position (as per above). Further to this, it made provision for and gives statutory authority to both the National Mitigation Plan (NMP), published in 2017 and the

National Adaptation Framework (NAF) published in 2018. This Local Adaptation Strategy forms part of the National Adaptation Framework.

The Local Authority Adaptation Strategy Development Guidelines 2018 provides guidance to Local Authorities to develop their own Climate Action Adaptation Strategy. In developing this adaptation strategy Louth County Council has been consistent with these guidelines.

3 LOUTH'S CLIMATE CHANGE ADAPTATION OBJECTIVES

The purpose of Louth County Council's Climate Change Adaptation Strategy is to achieve the national objective of becoming a more climate resilient society and economy by 2050. In order to help tackle current and future challenges that climate change can present, Louth County Council have set out a number of key objectives in their strategy, under six thematic principles. Table 1 below outlines Louth County Councils Climate Change Adaptation Strategy objectives per theme.

Under each theme in the Climate Change Adaptation Strategy there are a number of actions that have been detailed to achieve each Objective. All the actions per theme can be found in Appendix 1.

TABLE 1 LOUTH CLIMATE CHANGE ADAPTATION STRATEGY OBJECTIVES

Theme 1: Local Adaptation Governance and Business Operations	
1	To ensure that climate adaptation is mainstreamed into all activities and operations of the Local Authority.
2	To implement an appropriate response in addressing diversity of climate change impacts
Theme 2: Infrastructure and Built Environment	
1	To ensure and increase the resilience of infrastructural assets and inform investment decisions
2	To work towards the objective for a low carbon society
Theme 3: Land-use and Development	
1	To integrate climate action considerations into land-use planning policy and influence positive behaviour
Theme 4: Drainage and Flood Management	
1	To manage the risk of flooding through a variety of responses
Theme 5: Natural Resources and Cultural Infrastructure	
1	To provide for enhancement of natural environment to work positively towards climate action.
2	To promote effective bio-diversity management and enhance protection of natural habitats and landscapes
3	To protect heritage and cultural infrastructure
Theme 6: Community Health and Wellbeing	
1	To build capacity and resilience within communities
2	To promote health and well-being within communities

3.1 Consultation

3.1.1 Environmental authorities

Article 5 (4) of the SEA Directive specifies that each Member State should designate the relevant Environmental Authorities which, by reason of their specific environmental responsibility, are likely to be concerned with the potential environmental effect of any plan or programme. Article 9(5) and 9(6) of the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (as amended) details the need for the competent authority (Louth County Council) to consult the relevant environmental authorities regarding the development of certain plans and programmes. On an

Irish context, as a minimum the following environmental authorities should be contacted when developing county plans and programmes:

- Environmental Protection Agency (EPA);
- The Minister for the Environment (Minister Communications, Climate Action and Environment) – *where the planning authority considers that a plan might have significant effects in relation to the architectural or archaeological heritage or to nature conservation;* and
- The Minister for Communications, Marine and Natural Resources (Minister for Agriculture, Food and the Marine) - *where the planning authority considers that a plan might have significant effects on fisheries or the marine environment.*

Louth County Council on the 18th April 2019, sent the Draft Climate Change Adaptation Strategy and the SEA Screening Report to the following Environmental Authorities:

- Environmental Protection Agency (EPA);
- The Department of Agriculture, Food and the Marine;
- The Department of Communications Climate Action and Environment; and
- The Department of Culture Heritage and the Gaeltacht.

Table 2 below summaries the submissions from each Environmental Authority and how Louth County Council incorporated the comments into the Climate Change Adaptation Strategy.

TABLE 2 ENVIRONMENTAL AUTHORITIES SUMMARY OF SUBMISSIONS AND RESPONSES

Environmental Authority	Summary submission	Louth Co. Co. response
EPA	<ul style="list-style-type: none"> • Ireland’s Environment; An Assessment 2016 (EPA, 2016) report identifies climate change as one of three key systemic issues that need to be tackled in Ireland. This report highlights the need for us to accelerate mitigation actions to reduce greenhouse gas emissions and to implement adaptation measures to increase our resilience to the adverse impacts of climate change; • Climate change poses significant challenges for Ireland and a comprehensive national response is required if the national transition objective of a low carbon, climate resilient economy and society is to be achieved. We acknowledge that the Strategy forms a key part of this response at local authority level. We acknowledge that the Strategy has been prepared in line with the Local Authority Adaptation Strategy Development Guidelines (DCCAE, 2018). • The Strategy could include a schematic, clarifying the relationship between the Strategy and the Climate Act, National Adaptation Framework, adaptation guidelines etc. • The Strategy should include a commitment to align with and incorporate any relevant recommendations that may arise within regional climate adaptation plans/programmes/strategies prepared over the lifetime of the Strategy. 	<p>Louth County Council took on board the EPA comments and incorporated them through-out the strategy. The update reference to policies and practice that should be adhered to are taken on board, for example see section 1 of the Strategy.</p> <p>This SEA Screening Report has been produced in line with both the Habitats Directive and SEA Regulations (S.I. No. 435 of 2004).</p>

	<ul style="list-style-type: none">• In preparing and in implementing the Strategy, we recommend that opportunities should be sought to align with and collaborate with adjacent local authorities.• In preparing and implementing the Strategy, you should ensure that any potential negative environmental impacts are minimised. You should also seek to maximise the many potential co-benefits of climate adaptation measures for human health, biodiversity, water quality, flood risk management, land use planning (including land use zoning), and other interrelated areas. In considering and assessing the range of adaptation options available, we recommend that those measures with the potential to yield multiple environmental and societal benefits are prioritised.• We recommend that the Strategy includes a commitment that potential adverse cumulative / in-combination environmental effects are accounted for when considering, selecting and implementing specific adaptation measures. This is important to ensure that environmental sensitivities under the Habitats Directive and Water Framework Directive are protected. Furthermore, in preparing and assessing the Strategy, it will be important to ensure that ways to recognise maladaptation early are identified, and strategies to counter this are put in place.• The Plan should refer to the relevant OPW flood risk management plans. The second cycle of OPW flood risk management plans is currently underway and will cover areas outside the scope of the first cycle, including more rural areas. These should help inform the Strategy and future reviews.• Given the need to adapt to climate change across our society and economy, and become more energy and resource efficient, to support this transition to a low carbon society, a clear link could be made with the relevant UN Sustainable Development Goals (SDGs) should be included in the Strategy. This would help to show how Ireland is progressing these at all levels in the governance hierarchy, and, how progress in achieving the environmental related SDGs is being progressed at a local authority level.• Where changes to the Strategy are made prior to finalisation, or where modifications to the Plan are proposed following its adoption, these should be screened for potential for likely significant effects in accordance with the criteria set out in Schedule 1 of the SEA Regulations (S.I. No. 435 of 2004).• You should ensure that the Strategy complies with the requirements of the Habitats Directive	
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	<p>where relevant. Where Appropriate Assessment is required, the key findings and recommendations should be incorporated into the SEA and the Strategy.</p> <ul style="list-style-type: none"> • Noted the intention in section 6.1 to develop an Implementation Plan to deliver the actions set out in the Strategy. This implementation plan should consider the requirements of the SEA Directive and Habitats Directive, as relevant and appropriate. 	
The Department of Agriculture, Food and Marine	Responded to Public Consultation, see detail below	
The Department of Communications Climate Action and Environment	No response	
The Department of Culture, Heritage and the Gaeltacht	No response	

3.1.2 Public Consultation

Post Environmental Authority consultation, Louth County Council conducted a four-week period from 29th May 2019 to 28th June 2019, where the Draft Climate Change Adaptation Strategy, with the accompanying SEA Screening Report and Appropriate Assessment Screening Report were presented for public consultation. The follow outreach methods were used:

- Advertisement in Argus and Drogheda Independent on 29/05/2019
- Documents placed on Public Display in County Libraries on 29/05/2019
- Documents placed on public Display in all 4 Council offices on 29/05/2019
- Notification placed on Council website on 29/05/2019
- Notifications sent out via Council Twitter account on the 29/05/2019, during week commencing 10/06/2019 and re-tweeted 6 times until consultation ended on 29th June 2019
- Notification uploaded on the www.gov.ie public consultation portal on 28/05/2019
- Notification sent via Public Participation Network (PPN) weekly newsletter and on PPN website page on the 31/05/2019

Local Authority Members:

- Presentation at Strategic Policy Committee meeting on 25/03/2019
- Included in weekly newsletter on 31/05/2019
- Included in the CE monthly report on 31/05/2019

Adjoining Authorities

- Notification sent to Monaghan County Council on 29/05/2019
- Notification sent to Meath County Council on 29/05/2019
- Notification sent to Cavan County Council on 29/05/2019
- Notification sent to Newry Mourne District Council on 28/05/2019
- Notification sent to Climate Northern Ireland on 29/05/2019

- Notification sent to DKIT on 29/05/2019

Local Authority Staff

- Environmental services staff gave presentation to Management Team on 29/05/2019
- Email sent to all staff 29/05/2019
- Copy of Draft report given to Management Team and Adaptation team 29/05/2019
- Email with link to strategy sent to staff 29/05/2019
- Documents uploaded onto intranet on 29/05/2019

A number of submissions were received during the consultation period, and 11 submissions were received, from the following individuals and organisations :

- Office of Public Works x 2 submissions;
- Irish Water;
- Geraldine Martin;
- Newry Mourne District Council;
- Gas Networks Ireland;
- Dundalk Cycling Alliance;
- Department of Agriculture, Food and the Marine;
- Deborah Conlon, Chairperson, Louth Environmental Network;
- Ollan Herr; and
- Cllr. Marianne Butler.

3.1.3 Summary of Consultation submissions

Table 2 details the summary of responses from each of the organisations and individuals that made a submission to the public consultation period and summaries the response from Louth County Council to each of the submissions is detailed.

TABLE 3 SUMMARY OF PUBLIC CONSULTATION SUBMISSIONS AND RESPONSES

Organization / individual	Summary submission	Louth Co. Co. response
OPW	<ul style="list-style-type: none"> • Suggest that there is an addition of section on fluvial flooding in subsection of biodiversity and Coastal Management of the draft strategy. 	<ul style="list-style-type: none"> • Fluvial flooding is included in severe weather events, heavy rainfall references within the baseline assessment. All practical issues raised in the submission will be included in the final strategy where they are relevant and appropriate to Louth.

	<ul style="list-style-type: none"> • Typographical error CFRAM is catchment and not coastal Flood risk Management in Goal 4 action 6. 	<ul style="list-style-type: none"> • Action 6 updated to the following: <i>“Ensure that potential future flood information is obtained /generated by way of a Catchment Flood Risk Assessment Management (CFRAM) and used to inform suitable adaptation requirements within the Development Management process in line with the Guidelines for Planning Authorities on Flood Risk Management (DoECLG & OPW, 2009).”</i>
<p>Irish Water</p>	<ul style="list-style-type: none"> • Irish water is looking forward to collaborating with Louth County Council in implementing measures published in Government Climate Action Plan, Draft Climate Sectoral Adaptation plan: Water quality and Water Services Infrastructure. 	<p>Noted</p>
<p>Geraldine Martin</p>	<ul style="list-style-type: none"> • Suggests that LCC not to cut the grass in public areas except where it affects visibility on the roads or where children actually play; • Suggests that LCC sow some meadow seeds to make it look colourful and attract diverse insect life; • Encourage new businesses especially large business to have a sustainability plan and to use renewable energy sources; • Suggests that LCC should require all new companies in the county to plant a tree or many trees depending on the scale of their investment. If they do not have the space to plant the council could offer some land; • Suggests that LCC plant many more trees everywhere; • Suggests that LCC set up or encourage allotments in all the major housing estates; • Suggests that LCC set up a series of beehives at Alphonsus Road and for the beehives to be looked after by volunteers from the community; • Suggests that LCC provides a greenway to Blackrock from Dundalk; and • Suggests that LCC uses a Swedish model in how to become a capital of recycling looks at the following link for reference https://www.theguardian.com/environment/2019/jun/18/eskilstuna-how-a-swedish-town-became-the-world-capital-of-recycling 	<p>Part of the management plan includes grassland meadow areas are maintained and sown. The programme takes into account the National Pollinator Plan and there are areas set aside for pollinators in County Louth.</p> <p>Tree planting is actively encouraged and undertaken by LCC, action 1, Theme 5 and action 6, Theme 6, will encourage additional tree planting within the county.</p> <p>Landscaping schemes are actively promoted through the development management system on private development sites.</p> <p>Action 5, theme 6 of the Climate Action Adaptation Strategy commits to supporting the implementation of Healthy Ireland for Louth plan 2018-2022. Goal 2, action 44 of this plan is to <i>“Develop and promote walking and cycling strategies for the county”</i> and this is further echoed in Goal 4 Action 231 of the Louth Economic & Community Plan (LECP) 2016-2021.</p>

		<p>Additional action under theme 1 added as follows:</p> <p><i>“Through the work of the LEO, support businesses in integrating climate change considerations into existing business operations and in developing new ideas seeking to capture opportunity’s associated with environmental and technological advances that support transition to low carbon/circular economy.”</i></p>
Newry Mourne District Council	<ul style="list-style-type: none"> • Welcomes continued consultation with LCC for the development of the Climate Change Adaptation Strategy; and • Suggests that LCC give a presentation on the draft strategy at the next joint meeting of Louth County Council and Newry Mourne District Council 	Noted
Gas Networks Ireland	<ul style="list-style-type: none"> • Suggested additional action for Goal 2 - “Encourage policy to support and develop Compresses Natural Gas (CNG) infrastructure”; • Suggests that LCC to consider how renewable gas and CNG in transport can contribute to reducing carbon emissions in the region and provide economic benefits to the local community; • Suggests that LCC to support Anaerobic digestion plants; and • Suggests that LCC to support CNG refuelling stations and renewable injection points 	<p>The issues raised around the provision of alternative energy sources and their supporting infrastructure are best addressed in the upcoming review of the Louth County Development Plan.</p> <p>Theme 3 Actions 2 and 3 of the Climate Change Adaptation Strategy address the concerns in terms of climate adaptation.</p>
Dundalk Cycling Alliance	<ul style="list-style-type: none"> • Queries that there are no apparent actions to reduce individual carbon foot print in respect of modal shift from reliance on cars to walking and cycling in the Draft strategy; and • Suggest that a target of 10% spend of the roads budget on cycling and walking infrastructure both urban and rural in goals 3.2 and 3.3. 	<p>Theme 6, Action 5 of the Climate Action Adaptation Strategy commits to supporting the implementation of Healthy Ireland for Louth plan 2018-2022.</p> <p>The development of Dundalk Blackrock Greenway is an objective of the County Development Plan and LCC are working in conjunction with the OPW to co-ordinate delivery of this facility alongside the proposed CFRAMS flood defense infrastructures.</p>
Department of Agriculture, Food and the Marine	<ul style="list-style-type: none"> • Queries that the lack of inclusion/reference of the role of Agricultural/forestry sector in climate change adaption; • Provides general observation on the impact of Wildfires, slurry storage and 	The Louth Climate Change Adaptation Strategy has been developed specially to focus on the remit and operational control of Council functions and activities. Insofar as the request by the DAFM to examine

	<p>spreading issues, Soil Quality, Non-invasive Species; and</p> <ul style="list-style-type: none"> • Removal of reference to reforestation 	<p>complex issues facing agricultural/forestry activities these are best explored and dealt with in the Sectoral Adaptation Plan for Agriculture, Forestry and Seafood. The Council will support the DAFM in its efforts to deliver actions of the Agriculture, Forestry and Seafood Adaptation Plan where in particular the council is identified as having a particular role and where it forms an integral aspect of the functions of the council also.</p>
<p>Louth Environmental Network</p>	<ul style="list-style-type: none"> • Queries the development of the strategy 'in-house' by Louth County Council; • Believes that the scale of the climate change challenge is not fully acknowledged by Senior Management in LCC; • Suggests an external stakeholder should have assessed the climate impacts of all Development Plans in Co Louth since the publication of The UNFCCC in 1992. Strategy represents a "deeply under powered response to climate adaptation"; • Mitigation chapter is silent on future efforts and suggests its removal and replacement with external expertise. Suggests a range of mitigations measures to be include; • Urges LCC to seek support from Government and agencies/sectoral in the delivery of a climate change adaptation strategy; • Otherwise the strategy will be isolated from other larger scale responses as well as sectoral responses in transport, energy, land use and climate justice and will be inward focussed on the organisation rather than on the people of the County and the build and natural capital of the County; • Proposes that in context of 'Climate Justice' the Plan acknowledge the impact on poorer and more isolated people in urban and rural settings ensuring the most vulnerable are protected. Suggests undertaking a social inclusion analysis; • Suggests LCC establish renewable energy supply to supply LCC tenants and HAP recipients; • Advises promoting sustainable transport, public and integrated transport and active and public transport; 	<p>While mitigation measures are not prescribed for Adaptation Strategies, in Ireland, the public sector already has mandatory energy efficiency targets. These are set in the context of Ireland's EU and national commitments and wider climate change goals, whereby a target of 33% energy efficiency improvement is to be achieved by all Irish public bodies (as defined in Statutory Instrument 426 of 2014) by 2020.</p> <p>Public bodies are required to report annual energy efficiency data to the Sustainable Energy Authority of Ireland (SEAI) which manages the reporting process on behalf of the Department of Communications, Climate Action and Environment (DCCAE). Louth County Council continues to work towards meeting the targets set. In addition the new Climate Action Plan – <i>To tackle Climate Breakdown</i> published recently in 2019, sets out new and revised targets and calls on the local government sector to meet the required level of emissions i.e. 30% reduction in carbon emissions by 2030 and a 50% improvement in energy efficiency within the same timeframe. Louth County Council will continue to work with key stakeholders and communities across the county to achieve the new targets as set out in the National Plan and meet our statutory obligations in this regard through a range of</p>

	<ul style="list-style-type: none"> • Suggests mitigation chapter needs to address car based emissions to meet 2030 & 2050 targets and lack of hard targets is a shortcoming; • Suggests that 5 goals should have Carbon and other GHG reduction targets; • Suggests that the Governance Goal does not match governance structure for emergencies including finances; • Suggests that Goal 3 is lacking in delivering on sectoral action in areas of farming, forestry, & foreshore; • Suggests the strategy is focused essentially on the Council and its organisation and not on how communities house, heat and transport or manage natural capital; and • Recommends the strategy is proofed against Climate Action Plan. 	<p>mitigation measures that will run simultaneously and cohesively to the adaptation process.</p> <p>The Adaptation Strategy will work constructively alongside mitigation measures prescribed by the Climate Action Plan to contribute, as part of the local authority sector, to a robust response to Climate Action.</p>
<p>Ollan Herr</p>	<ul style="list-style-type: none"> • Highlights that LCC have limited responsibility/opportunities to take actions under green house gases emissions; • Queries how low income families will travel in the next decade; • Believes that LCC has not to put Climate Change or Healthy Active Lifestyles to the fore in the recent past; • Believes that LCC can do more in relation to the reduction of greenhouse emissions by providing safe traffic free cycle ways in Dundalk and should be making EU funding applications for same; • Believes that LCC have missed opportunities by their failure to make funding applications for EU funding for reduction of greenhouse emissions in 2016; • Suggests that LCC prepare “spade ready” plans to be better prepared to avail of cycle ways funding opportunities in the future; • Suggests that there is an opportunity for LCC and An Board Pleanála to co-operate together to ensure that unbroken traffic separated cycle ways are in place from Strategic Housing Developments to local schools and shopping destinations; • Urges LCC to be more effective and active in providing a low carbon and sustainable transport; and • Urges LCC to have a complete protected cycleway network in Dundalk as otherwise 	<p>This adaptation strategy will work collectively with mitigation measures to reduce greenhouse gas emissions undertaken by LCC prescribed in the National Climate Action Plan.</p> <p>LCC is encouraging of embracing the alternative modes of transport in particular walking and cycling.</p>

	<p>the incomplete cycleway network will only promote further frustration and cynicism.</p>	
<p>Cllr. Marianne Butler</p>	<ul style="list-style-type: none"> • Urges the Council, rather than simply parsing these submissions and tweaking the existing draft, to step back and ask themselves whether the proposed strategy is sufficient?; • Urges LCC to be more ambitious in the County Development plan and look at the total carbon footprint of where people live, work, and go to school; • Louth has already taken important steps to reduce car dependency with the introduction of the Smarter Travel scheme in Dundalk; • Suggests that the strategy should expressly disavow any continuation of previous planning philosophy that has seen both Dundalk and Drogheda reduced to hollowed-out donuts of big-box retailing and sprawling housing developments over the last 30 years; • Urges that it should be clear in the future we will prioritise the regeneration of town-centres as thriving commercial and residential communities that are designed around the needs of cyclists and pedestrians, and are well served by public transport; • Urges LCC to front-load the implementation of the Government’s Climate Change Action Plan, and immediately discourage major planning applications that envisage the use of gas or oil boilers; • Suggest that LCC ensure that there are new jobs available before we start shutting down the old ones from old industries; • Urges LCC to provide funding for encouraging Green businesses to County Louth and as failure to provide same will undermine LCC ability to deliver a “just transition” to a carbon neutral economy in Louth; and • Encourages LCC to establish a multi-agency task-force with Coillte, Teagasc, An Bord Bia, other locally based state agencies to develop a coordinated approach to promoting the sustainable use of our land in County Louth. 	<p>Adaptation measures will be undertaken alongside the National Climate Action Plan and sectoral plans, all culminating in a robust response to climate action (both adaptation and mitigation).</p> <p>It is recognised that the spatial planning process is a significant instrument to which climate action measures can be implemented. Goal 3 of this Climate Action Adaptation Strategy signposts the importance of land-use planning and it’s development. This will need to be taken up by the forthcoming County Development Plan process. This process in its own right will be influenced strongly by the National planning framework and the Eastern and Midlands Region RSES which both have climate change at its core.</p> <p>This Climate Change Adaptation Strategy will ensure that climate change measures will be mainstreamed into all functions and services of the local authority to ensure maximum climate action measures with its Communities to the fore.</p>

The Chief Executive Report attached with Louth's Climate Change Adaptation Strategy provides a detailed response to each of the submissions.

3.2 Appropriate Assessment

An Appropriate Assessment Screening Report has also been prepared for this Climate Change Adaptation Strategy in line with Article 6(3) of the EU Habitats Directive (92/43/EEC). The Report concludes:

In conclusion, further to a screening of Louth County Council's Climate Change Adaptation Strategy for possible significant effects on Natura 2000 sites no significant effects were identified.

The screening outlined in this report included an assessment of possible in-combination effects. Based on the objective information contained in this report and applying the precautionary principle, it is concluded that the Climate Change Adaptation Strategy will not have a significant effect on Natura 2000 sites.

The AA Screening Report accompanies Louth's Climate Change Adaptation Strategy.

4 DETERMINING WHETHER AN SEA IS REQUIRED

The objective of the SEA Directive for the assessment of the effects of certain plans and programmes on the Environment is to

*"provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment."*³

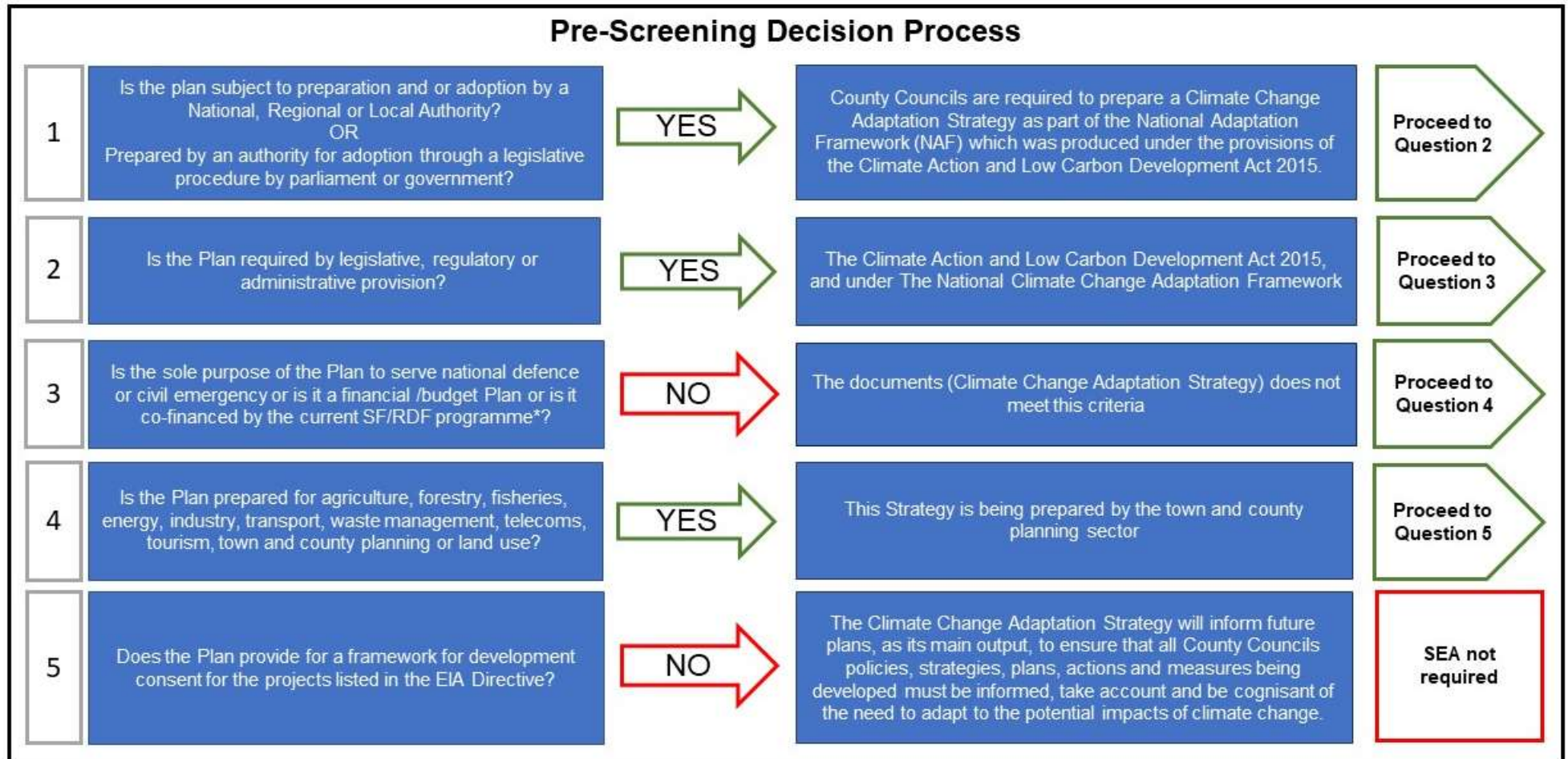
Post the Environmental Authority and Public Consultation, the updated Climate Change Adaptation Strategy was screened for SEA requirements. The below details the SEA screening process carried out.

4.1 Requirement to carry out SEA – Pre-Screening Checklist

In order to determine if this Strategy is considered a plan/programme under Article 3 of the SEA Directive, a pre-screening check is necessary. Figure 1 below provides details of the pre-screening checklist; this checklist is based on the decision tree published by the EPA in the *Development of SEA methodologies for plans and programmes in Ireland*.⁴

³ Directive 2001/42/EC of the European Parliament and of the Council of Ministers, of 27th June 2001, on the Assessment of the Effects of Certain Plans and Programmes on the Environment

⁴ P. Scott & P. Marsden., 2001-EEP/DS-2/5 *Development of Strategic Environmental Assessment (SEA) Methodologies for Plans and Programmes in Ireland* Synthesis Report © Environmental Protection Agency 2003



*SF/RDF: Structural Funds and Regional Development Funds under Council Regulation (EC) Nos. 1260/99 and 1257/99 which operate programming periods of 2000–2006 and 2000–2007, respectively.

FIGURE 1 PRE-SCREENING DECISION PROCESS

5 SEA SCREENING DETERMINATION

The Climate Change Adaptation Strategy was also screened using the criteria contained in Annex II of the SEA Directive. Table 2 and Table 3 below, details the screening assessment using the *criteria for determining the likely significance of effects* as set out in the SEA Directive, Annex II.

TABLE 4 SCREENING DETERMINATION FOR ANNEX II (1.), CRITERIA FOR DETERMINING THE LIKELY SIGNIFICANCE OF EFFECTS

The Characteristics of the Plan and Programmes having regard, in particular, to, the following criteria	
Criteria	Screening Determination
The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	<p>The purpose of this Climate Adaptation Strategy is to identify the risks to Louth County associated with climate change, and to set strategic goals, objectives and actions to adapt to these changes.</p> <p>Louth County Council's Climate Change Adaptation Strategy forms part of Ireland's national strategy for climate adaptation as set out in the National Adaptation Framework (NAF) which was produced under the provisions of the Climate Action and Low Carbon Development Act 2015.</p> <p>Louth County Council's Climate Change Adaptation Strategy, if adopted, will not set a framework for future development consent of projects, i.e. projects listed in both Annex I and Annex II of the Environmental Impact Assessment Directive.</p>
The degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	<p>This Climate Change Adaptation Strategy will inform other future plans, as its main output, to ensure that Louth County Councils policies, strategies, plans, actions and measures being developed must be informed, take account and be aware of the need to adapt to the impacts of climate change.</p> <p>Future individual county development policies, strategies, plans and projects must be considered under the SEA, EIA and/or AA processes.</p>
The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	<p>As the Climate Change Adaptation Strategy is aimed at integrating climate change adaptation into Louth County Councils plans, strategies and management team's agendas, the climate change adaptation measures will be implemented via future plans.</p> <p>This Climate Change Adaptation Strategy's main output is to ensure that all policies, strategies and plans for Louth County Council must be informed</p>

	<p>of the need to adapt to the potential impacts of climate change.</p> <p>Individual county development policies, strategies, plans and projects must be considered individually under the SEA, EIA and/or AA process.</p>
<p>Environmental problems relevant to the plan or programme;</p>	<p>The Climate Change Adaptation Strategy looks to integrate climate change adaptation into Louth County Council as a management function and/or an important criterion to be considering in developing Local Authority Plans or Actions. The climate change adaptation actions taken will be implemented via future plans as its main output is to ensure that all policies, strategies, plans and measures for Louth County Council must be informed of the need to adapt to the potential impacts of climate change.</p> <p>Individual county development policies, strategies, plans and projects must be considered individually under the SEA, EIA and/or AA process.</p>
<p>The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).</p>	<p>As the Climate Change Adaptation Strategy is aimed at integrating climate change adaptation into identified Louth County Councils Plans and Strategies and future Plans and Strategies, with some specific actions to help raise awareness of climate change both within management team and the wider public in Louth County, these actions can support plans and programmes that are related to waste generation, management, flood resilience and protection.</p> <p>However, these climate change adaptation actions will be implemented via future plans as its main output is to ensure that all policies, strategies, plans and measures for Louth County Council must be informed of the need to adapt to the potential impacts of climate change.</p>

TABLE 5 SCREENING DETERMINATION FOR ANNEX II (2.), CRITERIA FOR DETERMINING THE LIKELY SIGNIFICANCE OF EFFECTS

Characteristics of the Effects and of the Area Likely to be Affected, taking account of the following criteria	
Criteria	Screening Determination
The probability, duration, frequency and reversibility of the effects	<p>Louth County Council Climate Change Adaptation Strategy is aimed at integrating climate change adaptation into the Local Authorities plans, strategies and management agendas, this in itself will help develop climate resilience.</p> <p>The climate change adaptation actions will be implemented via future plans as its main output is to ensure that all policies, strategies, plans and measures developed by Louth County Council must be informed of the need to adapt to the potential impacts of climate change.</p> <p>Individual policies, strategies, plans and measures must be considered individually under the SEA, EIA and/or AA process.</p> <p>Any and all effects uncovered as part of this process will be considered in relation to the characteristics of the effects and of the area likely to be affected and the process will have regard, in particular, to the criteria as listed, according to the legislation.</p>
The cumulative nature of the effects	
The transboundary nature of the effects	
The risks to human health or the environment (e.g. due to accidents)	
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	
<ul style="list-style-type: none"> - <i>special natural characteristics or cultural heritage;</i> - <i>exceeded environmental quality standards or limit values; and</i> - <i>intensive land-use.</i> 	
The effects on areas or landscapes which have a recognised national, community or international protection status.	

6 CONCLUSION

This SEA Screening Report was carried out in order to determine the need for a Strategic Environmental Assessment for Louth County Council Climate Change Adaptation Strategy prepared under the National Climate Change Adaptation Framework. It has been concluded, based on the pre-screening check, and review against the environmental significance criteria as set out in Annex II of the SEA Directive, that a Strategic Environmental Assessment is not required. This is due to the fact that this Strategy does not provide a framework for development consent for projects listed in the EIA Directive. Furthermore, the purpose of this Climate Change Adaptation Strategy is to inform Local Authority policies, procedures and further plans on the need to incorporate climate change adaptation measures and it does not set out projects, plans or specific measures.

APPENDIX 1 – CLIMATE CHANGE ADAPTATION STRATEGY - ACTIONS

Theme 1: Local Adaptation Governance and Business Operations	Actions
1	Establish a Climate Action Steering Group with representatives from across key functions of local authority to ensure the successful implementation of the actions of this Climate Change Adaptation Strategy and to report on progress.
2	Mainstream Climate Action policy as integral consideration in the Corporate Plan objectives providing for the all local authority activities and the delivery of functions and services across the administrative area.
3	Review and implement a Business Continuity Plan to identify and address specifically, the impacts associated with extreme weather events on all functions/services of the local authority including: <ul style="list-style-type: none"> • Preparing for critical services disruptions, • Mitigating/Minimising the impact of service disruption and, • Improving the capacity/ability to recover.
4	Develop a Climate Action Policy for the organisation.
5	Establish a climate change champion within each section of the organisation
6	Ensure Green Procurement policies are implemented and all projects are designed to be climate resilient
7	Liaise, collaborate and work in partnership with the sectors identified in the National Adaptation Framework, subject to funding, in the delivery of the government approved sectoral adaptation actions, where they relate and are relevant to the functions and activities of the council at local level/in local communities.
8	Through the work of the LEO, support businesses in integrating climate change considerations into existing business operations and in developing new ideas seeking to capture opportunity's associated with environmental and technological advances that support transition to low carbon/circular economy

Theme 2: Infrastructure and Built Environment	Actions
1	Apply a robust risk assessment and management framework to Local Authority owned buildings and properties including Housing Stock to identify and protect against the key vulnerabilities to the impacts of climate change and mitigate against service disruption.
2	Integrate climate considerations into the design, planning and construction of all roads, footpaths, bridges, public realm and other construction projects. Make provision to incorporate green infrastructure as a mechanism for carbon offset.
3	Undertake a Risk Assessment of road infrastructure in the area to identify the severity of climate change risks on their function and condition. The risk assessment should provide for an understanding and quantification of risks posed. The findings should be integrated into decision making processes, road infrastructure programmes and investment strategies. `
4	Implement and integrate the Green Infrastructure Strategy and policies into the activities of the organisation
5	Continue to link with the third level sector to encourage their involvement in the development of novel sustainable energy community initiatives with a goal of making all communities low carbon.
6	Actively support the implementation of ISO50001 and explore the feasibility to expand to all Louth County Council Public Buildings
7	Integrate climate proofing of the Organisation's Energy Action plan

Theme 3: Landuse and Development	Actions
1	Identify and integrate climate change as a critical consideration and guiding principle informing core strategy, strategic objectives, policies and development control standards of the County Development Plan and Local Area Plans.
2	Promote the integrated planning, design and delivery of green infrastructure (including urban greening) through appropriate provisions in planning policies, development standards, and infrastructural, public realm and community projects.
3	Research and incorporate, in the content of the County Development Plan, measures in accordance with section 10 (n) of the Planning and Development Acts 2000 (as amended) for: (n) the promotion of sustainable settlement and transportation strategies in urban and rural areas including the promotion of measures to— (i) reduce energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in non-renewable resources, (ii) reduce anthropogenic greenhouse gas emissions, and (iii) address the necessity of adaptation to climate change; in particular, having regard to location, layout and design of new development;
4	Encourage Green Businesses to be based in County Louth and promote circular economy business
5	Ensure that policies of the development plan are designed to have a high level of climate resilience for settlement, economic development, natural environment, built environment, cultural and natural heritage

Theme 4: Drainage and Flood Management	Actions
1	Undertake a surface water management plan for the assessment and management of flood risks with the aim of reducing the adverse consequences of flooding, to prioritise projects to reduce surface water flood risk and provide for detailed mapping of areas prone to surface water and groundwater flood risk.
2	Stipulate the requirement for the design and specification of urban stormwater drainage systems for new development to take account of the potential future impact of climate change.
3	Develop a Sustainable Urban Drainage Systems Strategy and incorporate the requirement for Sustainable Urban Drainage Systems where appropriate in local authority projects and private development sites
4	Ensure that potential future flood information is obtained / generated by way of a Flood Risk Assessment (FRA) and used to inform suitable adaptation requirements within the Development Management process in line with the Guidelines for Planning Authorities on Flood Risk Management (DoECLG & OPW, 2009).
5	Ensure that all future proposed Infrastructural works are climate resilient and are designed in accordance with best practice guidelines
6	Ensure that potential future flood information is obtained /generated by way of a Catchment Flood Risk Assessment Management (CFRAM) and used to inform suitable adaptation requirements within the Development Management process in line with the Guidelines for Planning Authorities on Flood Risk Management (DoECLG & OPW, 2009).
7	Liaise and collaborate with the OPW in the implementation the Programme of Works for Flood relief in County Louth

Theme 5: Natural Resources and Cultural Infrastructure	Actions
1	Develop a strategy to undertake and implement an active Tree Planting programme in the context of climate adaptation in conjunction with an awareness campaign that informs of the benefits to communities in improving air quality, offsetting carbon emissions, promoting biodiversity, limiting flood risk, reducing urban heat, as well aesthetic value.
2	Review Bio-diversity Plans / habitat conservation strategies, plans and projects to ensure that: <ul style="list-style-type: none"> • all risks from adverse climate change have been identified; • future changes are assessed and identify measures to address issues • carbon capture within habitats is considered.
3	Research and map areas considered beneficial for use as local carbon offset through carbon sequestration and include in Green Infrastructure strategy.
4	Explore the feasibility of research projects on climate action with third level education centres such as DKIT
5	Promote protection of natural habitats and biodiversity with the organisation and within communities
6	Undertake a risk assessment of the Heritage and Cultural Assets in the county to assess the vulnerability and the risk to the historical environment from the impacts of climate change and to help build resilience to these important assets.
7	Review the LECF 2016-2021 plan to ensure that climate change actions are integrated into the goals and objectives of the plan.

Theme 6: Community Health and Wellbeing	Actions
1	Through public participation network raise awareness of the impacts of climate change and ways for communities to increase response and resilience to these impacts.
2	Assess communities across the county in the context of their vulnerability to the impacts of climate change. Identify vulnerable communities and the risks to the community.
3	For identified vulnerable communities, develop and implement a programme to enhance their capacity to respond to and recover from extreme weather events with specific aims to: <ul style="list-style-type: none"> • help the vulnerable community to develop a stronger facilitating role for mitigating risks • provide advice on the risk of extreme events affecting their locality • Devise mitigating actions to enhance preparedness • provide support to develop appropriate resilience arrangements to enable response and recovery
4	Support the Implementation of the Healthy Ireland for Louth Plan 2018-2022 particularly where actions relate to reducing the impact of climate change.
5	Promote clean local environments by continuing to invest in Tidy Towns, tree planting and other environmental initiatives throughout the county.