



# Strategic Environmental Assessment Screening Report

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

*Determination of the need for a Strategic Environmental  
Assessment for Leitrim 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.<sup>1</sup>

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 Directive<sup>2</sup> 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.

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<sup>1</sup> *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>

<sup>2</sup> 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 Department of Environment, Heritage and Local Government guidance document entitled *Implementation of SEA Directive 2001/42/EC Assessment of the Effects of Certain Plans and Programmes on the Environment November 2004*, specifically Chapter 3 (SEA: Screening and Scoping) and furthermore uses the criteria for SEA screening criteria set out in the SEA Directive.

An Appropriate Assessment Screening Report has 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 4<sup>th</sup> November 2016) and it is aimed at:

- Limiting global warming to less than 2<sup>0</sup>C above pre-industrial level and pursuing efforts to limit the temperature increase to 1.5<sup>0</sup>C.
- 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 Leitrim County Council has been consistent with these guidelines.

### 3 LEITRIM'S CLIMATE CHANGE ADAPTATION OBJECTIVES

The purpose of the Leitrim 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, Leitrim County Council have set out a number of key objectives in their strategy, under seven thematic principles. Table 1 below outlines Leitrim 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 LEITRIM'S CLIMATE CHANGE ADAPTATION STRATEGY OBJECTIVES**

<b>Theme 1 (G1): Local Adaptation Governance and Business Operations</b>
To ensure that climate adaptation is mainstreamed into all activities and operations of the Local Authority.
<b>Theme 2 (G2): Infrastructure and Built Environment</b>
To ensure and increase the resilience of infrastructural assets and inform investment decisions
To work towards the objective for a low carbon society
<b>Theme 3 (G3): Landuse and Development</b>
To Integrate climate action considerations into land-use planning policy and influence positive behaviour
<b>Theme 4 (G4): Drainage and Flood Management</b>
To manage the risk of flooding through a variety of responses
To support flood risk mitigation measures
<b>Theme 5 (G5): Natural Resources and Cultural Infrastructure</b>
To provide for enhancement of natural environment to work positively towards climate action
To promote effective bio-diversity management and enhance protection of natural habitats and landscapes
To protect Heritage and Cultural Infrastructure
<b>Theme 6 (G6): Community Health and Wellbeing</b>
To build capacity and resilience within communities
<b>Theme 7 (G7): Economic Development</b>
To identify and support opportunities that may arise from pursuing adaptation efforts through the functions of Leitrim County Council

## 3.1 Consultation

### 3.1.1.1 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 (Leitrim 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.*

Leitrim County Council on the 24<sup>th</sup> May 2019 sent the Draft Climate Change Adaptation Strategy and the SEA Screening Report to the following Environmental Authorities:

- Environmental Protection Agency (EPA).
- Dept of Arts, Heritage, Regional, Rural & Gaeltacht Affairs;
- Department of Agriculture, Food & the Marine; and
- Department of Communications, Climate Action and Environment.

### 3.1.1.2 Public Consultation

Post Environmental Authority consultation, Leitrim County Council conducted a four-week period from 19<sup>th</sup> June 2019 to 22<sup>nd</sup> July 2019, where the 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:

- Newspaper Notice in a local paper;
- Display stand and information points at Leitrim County Council Head Offices and Manorhamilton Area Office;
- Social Media and Website post on Leitrim County Council sites;
- Government Public Consultations Portal;
- Leitrim Elected Members presentation;
- Sent to interdepartmental representatives;
- Leitrim Local Community Development Committee (LCDC)
- Community and Voluntary Groups (Public Participation Network)
- Sent to Tidy Towns and Heritage Groups within the County;
- Engagement with adjoining Local Authorities
- The CARO engaged with the Departments responsible for the development of sectoral adaptation plans inviting them to review the local authority adaptation strategies and to make submissions; and
- The CARO identified key high-level stakeholders according to their importance and relevance to the subject matter of local authority adaptation strategies and invited them to make observations/submissions on the local authority adaptation strategies.

A number of submissions came in during the consultation periods, and 13 submissions were received in total from the following individuals and organisations:

- Office of Public Works (OPW);
- Irish Water;
- An Taisce;
- Kevin Keely;
- Department of Culture, Heritage and the Gaeltacht;
- Environmental Protection Agency (EPA);
- Department of Communications, Climate Action and Environment (Geological Survey Ireland);
- Good Energies Alliance Ireland;
- Neil Foulkes;
- Lyn Brookes;
- Health & Safety Department, Leitrim County Council;
- Department of Agriculture, Food and the Marine; and
- Eastern and Midlands Climate Action Regional Office (CARO).

### 3.1.1.3 Summary of Consultation Submissions

Table 3 details the summary of responses from each of the organisations and individuals that made a submission to the consultation periods and summaries the response from Leitrim County Council to each of the submissions.

**TABLE 2 CONSULTATION SUBMISSIONS AND REPSONSES**

Organisation / individual	Summary submission	Leitrim Co. Co. response
Office of Public Works	In considering current and potential future climate impacts, some description should be provided concerning the existing level of flooding and flood risk and also predictive assessments of flood hazard such as Catchment Flood Risk Assessment & Management (CFRAM) Programme and Irish Coastal Protection Strategy Study (ICPSS).	Leitrim CCAS is based around seven thematic areas, one of which is 'Drainage and Flood Management' (Actions 19-22);  Support for the OPW's CFRAMS Plans is a high level Action set out in Action No. 19.
	Promotion and support of Leitrim and Mohill (Tranche 1 Schemes), Carrick on Shannon and Dromod (Tranche 2 Schemes) under the National CFRAM Programme.	Leitrim County Council is actively engaged in the promotion and implementation of CFRAM projects in Carrick on Shannon, Leitrim Village, Mohill and Dromod. This support will continue and other projects will be developed with the OPW.
	Promotion of Sustainable Urban Drainage Systems (SUDS) with due consideration for the potential increases in intense rainfall event.	Action No's 21 and 22 of the Leitrim CCAS includes for SuDS design and implementation where appropriate. This approach is guided and implemented by the Planning Department and is already an important consideration in the granting of planning permission. This SuDS requirement is also incorporated into new road



		design and construction by TII and capital infrastructure projects.
	Promotion and support of flood relief schemes and FRMPs schemes.	Leitrim County Council is actively engaged in the promotion and implementation of CFRAM projects. This support will continue and other projects will be developed with OPW. Actions 19-22 of the CCAS refer.
	Take into account climate change when developing Minor Works Schemes as per the 2015 Adaptation Plan for Flood Risk Management	<p>This is covered under Theme 2 “Infrastructure and Built Environment”- Actions 12 and 13 of the Strategy. Climate Change Risk Assessments will be undertaken and used to inform design of all minor (and major) works schemes particularly in the area of roads and drainage.</p> <p>Action 12 updated to the following:</p> <p><i>“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.</i></p> <p><i>For projects subject to funding and investment of public money, include climate change considerations as criteria for assessment ultimately ensuring that community projects are designed and developed to be climate resilient and/or are proactive in promoting and working positively towards climate action”.</i></p>
	Obligation of local authorities under the SI transposing the ‘Floods’ Directive.	Leitrim County Council will address obligations arising under the Floods Directive as part of future Annual Work Programmes.
	Potential impacts of climate change should be taken into account as part of the planning process.	This is covered under Theme 3 – Land use and Development where the stated objective is “To

		<p><i>Integrate climate action considerations into land use planning policy” and associated actions 11, 12, 13 and 14.</i></p>
	<p>Consider increase flood extents and depths in the planning and implementation of new infrastructure</p>	<p>Action 12 updated to the following:</p> <p><i>“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.</i></p> <p><i>For projects subject to funding and investment of public money, include climate change considerations as criteria for assessment ultimately ensuring that community projects are designed and developed to be climate resilient and/or are proactive in promoting and working positively towards climate action”.</i></p>
	<p>Consideration of more frequent and/or resource-intensive emergency responses from first responders</p>	<p>Action 3 updated to the following:</p> <p><i>“Undertake a Business Continuity Plan to identify and address specifically, the impacts associated with extreme weather events on all functions/services of local authority including:</i></p> <ul style="list-style-type: none"> <li><i>• Prepare, adopt and update a “Major emergency Plan”</i></li> <li><i>• Prepare and adopt a Policy and Procedure for the Management of the Local Authority Response to Storms SMS PP S12</i></li> <li><i>• Prepare a Winter Maintenance Plan</i></li> <li><i>• Provide necessary resources to implement these plans</i></li> <li><i>• Preparing for critical services disruptions</i></li> <li><i>• Mitigating/Minimising the impact of service disruption and,</i></li> </ul>

		<i>Improving the capacity/ability to recover.”</i>
	Fluvial and coastal flood risk was assessed under the CFRAM Study but this did not include flood risk from groundwater or surface water	This is included in Theme 4 “Drainage and Flood Management”- Action No. 19
Irish Water	Irish Water looks forward to collaborating with Leitrim County Council in implementing the measures set out in the Government Climate Action Plan and the Draft Climate Change Sectoral Adaptation Plan: Water Quality and Water Services Infrastructure	Leitrim Co. Co. note the submissions and that the Government Climate Action Plan will be referenced in the Final Strategy.
An Taisce	An Taisce suggests that the strategy lacks the detail regarding what it is the plan aims to achieve.	The Climate Action and Low Carbon Development Act 2015 directs the scope of the National Adaptation Framework for sectors and local authorities under section 5(2) in order to (i) reduce the vulnerability of the State to the negative effects of climate change, and (ii) avail of positive effects of climate change that may occur.
	Thematic areas and associated goals are over-generalised, hindering the effectiveness of the goals	
	Definition of ‘ <i>Climate Adaptation</i> ’ – may serve to undermine the entirety of the adaptation strategy	Action is as follows:  “ <i>In addition, the benefits and opportunities that may arise as a result of climate change must be capitalised upon.</i> ” - An Taisce submit that this statement has no place in a Climate Adaptation Strategy.
	Wording: “ <i>In addition, the benefits and opportunities that may arise as a result of climate change must be capitalised upon.</i> ” - An Taisce submit that this statement has no place in a Climate Adaptation Strategy.	
	Chapter 6 – lacking in necessary detail with vague timeframe given and no deadlines provided; no key performance indicators or targets; funding details not provided and it is not clear as to whether funds for the actions are available and ring fenced.	
	Suggests that the Adaptation Strategy should contain more specific and timetabled targets, which are measurable, and for which responsibility can be assigned to a lead agency	The Climate Action and Low Carbon Development Act 2015 directs the scope of the National Adaptation Framework for sectors and local authorities under section 5(2) in order to (i) reduce the vulnerability of the State to the negative effects of climate change, and (ii) avail of positive effects of climate change that may occur.
	Suggest a financial plan should accompany the strategy	
<ul style="list-style-type: none"> <li>• Suggests to facilitate immediate and decisive action – clear and immediate timelines should be devised with explicit deadlines in place, with a clear and achievable plan for rigorous stakeholder engagement; Consider timeframe definition of short/medium/long-term.</li> </ul>	Timeframes and Stakeholders (Lead & Partner(s) have been specified as per Section 6.2 Climate Adaptation Plan – Goals, Objectives & Actions	

	<ul style="list-style-type: none"> <li>• Specific actions for stakeholders should be ‘clearly spelled out’ – people and organizations responsible need to be identified <i>and made aware of their responsibility</i></li> </ul>	
	<p>Consider re-wording of ‘<i>Budgeted</i>’ in Chapter 7</p>	<p>Heading ‘<i>Budget Approved</i>’ represents the capacity from within existing resources.</p>
	<ul style="list-style-type: none"> <li>• Underestimation of the importance of biodiversity for climate mitigation and adaptation; Carbon capture should be carried out with biodiversity and social concerns in mind, and the sequestration potential of native broadleaves over non-native conifers should be recognized</li> <li>• Recommended that Biodiversity concerns should form a comprehensive part of this plan, as biodiversity loss and climate change are inextricably linked.</li> </ul>	<p>This is a core mitigation measure which is beyond the scope of the Climate Change Adaptation Strategy and will be incorporated into future planning for Climate Change Mitigation.</p>
	<ul style="list-style-type: none"> <li>• Responsibility for implementation of Action No. 13 ‘Identify and integrate climate change as a critical consideration and guiding principle informing core strategy of the future County Development Plan’ – With the responsibility for implementing this action left to ‘Planning’, An Taisce would highlight that this should be one of the priority actions in the plan and cannot be left to a single department within the Council.</li> <li>• Planning system lacks mechanisms which allow climate change considerations to be integrated</li> </ul>	<ul style="list-style-type: none"> <li>• The Planning function deals primarily with land-use and development.</li> <li>• Action No. 2 of the CCAS includes the mainstreaming of climate action policy as an integral consideration in the Corporate Plan objectives, providing for all local authority activities and the delivery of functions and services across the administrative area.</li> </ul>
	<p>Details surrounding Action 15 are notably lacking- including what mechanisms will be used, whether these measures will be obligatory and what national/international best practice designs these will be modelled on.</p>	<p>The upcoming formation of a new County Development Plan will endeavor to address the issues in relation to integrated planning, design and delivery of green infrastructure.</p>
	<ul style="list-style-type: none"> <li>• Comments that Action No. 10 ‘<i>Make provision to incorporate green infrastructure as a mechanism for carbon offset</i>’ - The offset of any such piecemeal green infrastructure will be miniscule compared with the system overhaul which is required</li> <li>• Comments Action No. 10 ‘<i>Integrate climate considerations into the design, planning and construction of all roads, footpaths, bridges, public realm and other construction projects</i>’ – unclear, how exactly climate considerations will be integrated into these</li> </ul>	<p>These are core mitigation measures which are beyond the scope of the Climate Change Adaptation Strategy and will be incorporated into future planning for Climate Change Mitigation.</p>

	Suggested that the actions outlined in this plan are not sufficient to implement the steps necessary to achieve the necessary transport policy objectives (Action 96 – Climate Action Plan 2019)	This is a core mitigation measure which is beyond the scope of the Climate Change Adaptation Strategy and will be incorporated into future planning for Climate Change Mitigation.
	Highlighted that the actions outlined in Objective 1 should be outlined in detail in the Climate Adaptation Strategy – not left to the Steering Group to devise, without the scrutiny of public consultation, as required under the Aarhus Convention.	The Climate Action and Low Carbon Development Act 2015 directs the scope of the National Adaptation Framework for sectors and local authorities under section 5(2) in order to (i) reduce the vulnerability of the State to the negative effects of climate change, and (ii) avail of positive effects of climate change that may occur.
	An Taisce note that there is no public stakeholder representation on the Adaptation Steering Group, nor environmental NGOs – An Taisce submit that an emergency Climate Action Group should be established Review/Consider establishment of Climate Action Task Force with full representation across all state and semi-state bodies, the public and relevant stakeholder groups business interests	
	Little mention within the plan of any co-ordination between stakeholders within the community	This aspect is addressed in Action no. 29
	Recommends prioritised action should be that a stakeholder group such as an ‘Emergency Climate Action Task Force’ should examine the integration of this plan with other plans, programmes and policies.	This action will be considered at a later date with the Climate Action Regional Office
Kevin Keely	Plantation still going ahead without the proper setback and without even a nod in the directions of species diversification and felling continues without impact studies	Afforestation is primarily a matter for Department of Agriculture.
Department of Culture, Heritage and the Gaeltacht	<ul style="list-style-type: none"> <li>• Recommends the identifications of the architectural heritage in local authority areas including, but not necessarily restricted to, the protected structures and architectural conservation areas designated in the local authority Development Plan</li> <li>• Suggests including objectives to carry out climate risk assessments for the historic structure and sites</li> <li>• Suggests including objectives to develop disaster risk reduction policies</li> <li>• Recommends including objectives to develop resilience and adaptation strategies for the architectural heritage in the area</li> </ul>	<p>These issues are considered mitigation measures which are beyond the scope of the Climate Change Adaptation Strategy and will be incorporated into future planning for Climate Change Mitigation.</p> <p>However, architectural heritage of the county will be considered as part of the new County Development Plan in the context of the new Climate Change Adaptation Strategy.</p>

	<ul style="list-style-type: none"> <li>• Suggest developing the skills capacity within the LA to address adaptation/mitigation/emergency management issues affecting historic structures and sites</li> </ul>	
	The Department recommends that, where such officers are employed, the architectural conservation officer and/or heritage officer should be included on the local authority's Adaptation Steering Group	The inclusion of the Heritage Officer in the Climate Change Adaptation Steering Group will be considered.
	Action No. 17 – " <i>Identify and rectify where possible recurring flooding issues on local roads</i> " – This action could be interpreted as operating at a directly actionable level and as such caution should be taken when screening this action out for SEA and or AA.	Action No. 17 is addressed in the Annual Roadworks Programme for road improvements and drainage works, prioritised to deal with flood issues;
	No 'Screening overview for AA' has been supplied	The Appropriate Assessment Screening Report and Draft Strategic Environmental Assessment Screening Report accompanied the documentation during the public consultation period
Environmental Protection Agency	Section 1.4 - the footnote should be amended to reflect the publication year of EPA Research Report 223 (2017)	Amended
	<ul style="list-style-type: none"> <li>• Recommends that Under Theme 3: Land use and development, consider amending the text as follows "Sustainable policies and measures are devised and implemented to influence positive behavioral changes, support climate adaptation actions."</li> <li>• Consider also including an additional high-level goal reflecting the need for more effective implementation of relevant related regulations, policies, plans and strategies with a role in climate adaptation and environmental protection</li> </ul>	Thematic Areas – High Level Goals, as described in Chapter 6, are deemed appropriate and relevant for this Adaptation Strategy
	Under Theme 5: Natural Resources and Cultural Infrastructure, consider amending the text as follows " <i>Fostering and implementing meaningful approaches to protecting natural and key cultural assets.</i> "	Thematic Areas – High Level Goals, as described in Chapter 6, are deemed appropriate and relevant for this Adaptation Strategy
	Recommend also referring to the wider environmental benefits of green infrastructure, such as microclimate benefits including providing shade to alleviate heat stress,	This recommendation is beyond the scope of this Climate Change Adaptation Strategy

	supporting urban biodiversity, water retention, and flood alleviation	
	Consider acknowledging that adaptation actions may involve a mixture of grey, green and soft measures.	The Climate Change Adaptation Strategy sets out a range of objectives and actions to deliver on the thematic areas – high level goals.
	Recommended Action 21 text could be amended to “ <i>an active native Tree Planting Programme...</i> ”	Action updated to the following:  <i>“Develop a strategy to undertake and implement an active native 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 as aesthetic value.”</i>
	Suggests Action 22 relating to natural borders/buffers/blueways/greenways, we recommend that you consult with NPWS to ensure appropriate buffer zones are provided, maintained and protected	This matter will be taken into consideration for the planning stages of any associated projects
	Recommend that a commitment is included to develop and implement an Implementation Plan to deliver the actions set out in the Strategy.	Chapter 7 – Implementation Monitoring and Evaluation – included in the CCAS
Department of Communications, Climate Action and Environment – Geological Survey of Ireland	There is a need to identify areas for integrated constructed wetlands	<ul style="list-style-type: none"> <li>• Integrated Constructed Wetlands are primarily for use in Wastewater Treatment solutions;</li> <li>• Action No. 26 refers to the identification of wetlands for flood mitigation purposes which will be identified in the new County Development Plan</li> </ul>
Good Energies Alliance Ireland	Suggests no emphasis on ensuring that the public get full information on the impact of major weather events	This matter is addressed by Met Éireann and the National Emergency Co-ordination Group
	Suggest not enough emphasis on integrating climate change in all plans, strategies and policies prepared by the Council.	Action No. 2 of the Strategy includes the mainstreaming of climate action policy as an integral consideration in the Corporate Plan objectives, providing for all local authority activities and the delivery of functions and services across the administrative area

	<p>Recommends more work needs to be done on the role of biodiversity areas in climate resilience and raising awareness of these</p>	<p>This is a matter of mitigation for future consideration</p>
	<p>Suggests section (G4, pg. 34) must be expanded and approached with far more ambition than the draft strategy proposes – Recommend to: Recommend:  <ul style="list-style-type: none"> <li>• Working with the Department of Culture, Heritage and Gaeltachts to increase resilience of freshwater sources, bogs and pollution.</li> <li>• Undertake audit of natural and cultural heritage assets, mapping areas beneficial for use as local carbon offset</li> <li>• Develop a Peatland Management Strategy and rewetting programme</li> <li>• Promote green infrastructure and sustainable design in the built environment</li> </ul> </p>	<p>These issues are considered mitigation measures which are beyond the scope of the Climate Change Adaptation Strategy and have be incorporated into future planning for Climate Change Mitigation and additional actions added / edited as part of the finalizing of the Strategy.</p>
Neil Foulkes	<ul style="list-style-type: none"> <li>• Recommends the need to carry out a County Hedgerow Survey at regular intervals (recommended every 10 years) should form part of Leitrim County Council's Climate Change Adaptation Strategy</li> <li>• Suggest the strategy should also require a full assessment of the climate change implications of the potential loss of a large proportion of the counties ash trees to ash dieback disease.</li> </ul>	<p>These matters will be included for consideration in the development of the Heritage Plan.</p>
Lyn Brookes	<ul style="list-style-type: none"> <li>• Address the food crisis that we will inevitably be facing and be prepared – setting up food production around our towns and villages in an effort to become more self sufficient</li> <li>• Suggests the council should identify plots of land for community allotments for people who wish to grow their own food</li> </ul>	<p>Action No. 30 includes support for communities to increase their awareness and resilience to Climate Change; The concept of allotments will be considered as part of this action.</p>
Health & Safety Department, Leitrim County Council	<p>Suggests that Policy and Procedure should be put in place for the Management of the Local Authority Response to Storms</p>	<p>Incorporated under Action No. 4</p>
Department of Agriculture, Food and the Marine	<p>Highlights that there must be a sense of ownership/inclusion from the agricultural sector in this plan which is not evident at present.</p>	<p>The Climate Action and Low Carbon Development Act 2015 directs the scope of the National Adaptation Framework for sectors and local authorities under section 5(2) in order to (i) reduce the vulnerability of the State to the negative effects of climate change, and</p>



		(ii) avail of positive effects of climate change that may occur.
	Highlights that in the strategy the role of land use in the water system, for example well planned and managed forest can help to improve water quality and to buffer and slow flows	These matters are considered mitigation measures for future consideration in Climate Change mitigation planning.
	General observations on issues that overlap with identified agricultural issues; Wildfires, Slurry Storage and Land Spreading Issues; Soil Quality; Non-native Invasive Species	
	Comments that on Page 4: <i>“Ensure a proper comprehension of the key risks and vulnerabilities of climate change.”</i> – Is improving comprehension targeted at internal staff members, the wider public, or both?	Primarily related to Local Authority staff, and stakeholders listed
	Page 5: <i>“Emissions from changes in land use such as urbanisation, deforestation, reforestation and desertification.”</i> – While deforestation is a significant source of emissions of greenhouse gases, reforestation is an important measure for increasing removals of GHGs.	
	Suggests that some consultation process with farmers in the county be worked into the Plan to recognise the contribution that their land use actions have on mitigating flooding risks and consequences?	The Climate Action and Low Carbon Development Act 2015 directs the scope of the National Adaptation Framework for sectors and local authorities under section 5(2) in order to (i) reduce the vulnerability of the State to the negative effects of climate change, and (ii) avail of positive effects of climate change that may occur.
	Recommends in relations to Action No. 21 – Farmers and other landowners could have a significant contribution in this area if there was a pathway established for their involvement through this plan.	These issues are considered mitigation measures which are beyond the scope of the Climate Change Adaptation Strategy and will be incorporated into future planning for Climate Change Mitigation.
Eastern and Midlands Climate Action Regional Office (CARO)	It is important that Leitrim County Council’s Climate Change Adaptation Strategy recognises the purpose of the National Climate Action Plan and the role intended for Local Authorities to meet targets and contribute to the national climate ambition. It is recommended to include an action to reflect same in the Adaptation Strategy.	Reference to the National Climate Action Plan to be incorporated into the Strategy.  Action 8 updated to the following:  <i>“Liaise, collaborate and work in partnership with the sectors identified in the NAF, subject to fund-</i>

		<p><i>ing, 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.</i></p> <p><i>Building on adaptation planning actions set out in this strategy, support and compliment the practical implementation of actions arising from the National Climate Action Plan – to Tackle Climate Breakdown (as revised and updated annually), across the broad range of functions of the local authority to achieve the national climate ambition i.e. decarbonisation targets to 2030 and objectives to 2050.</i></p> <p><i>Develop procedures and templates to ensure that the financial aspects of extreme weather are collated, recorded and reported to operational and senior management team”</i></p>
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### 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 Leitrim 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 Leitrim’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.”<sup>3</sup>*

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**

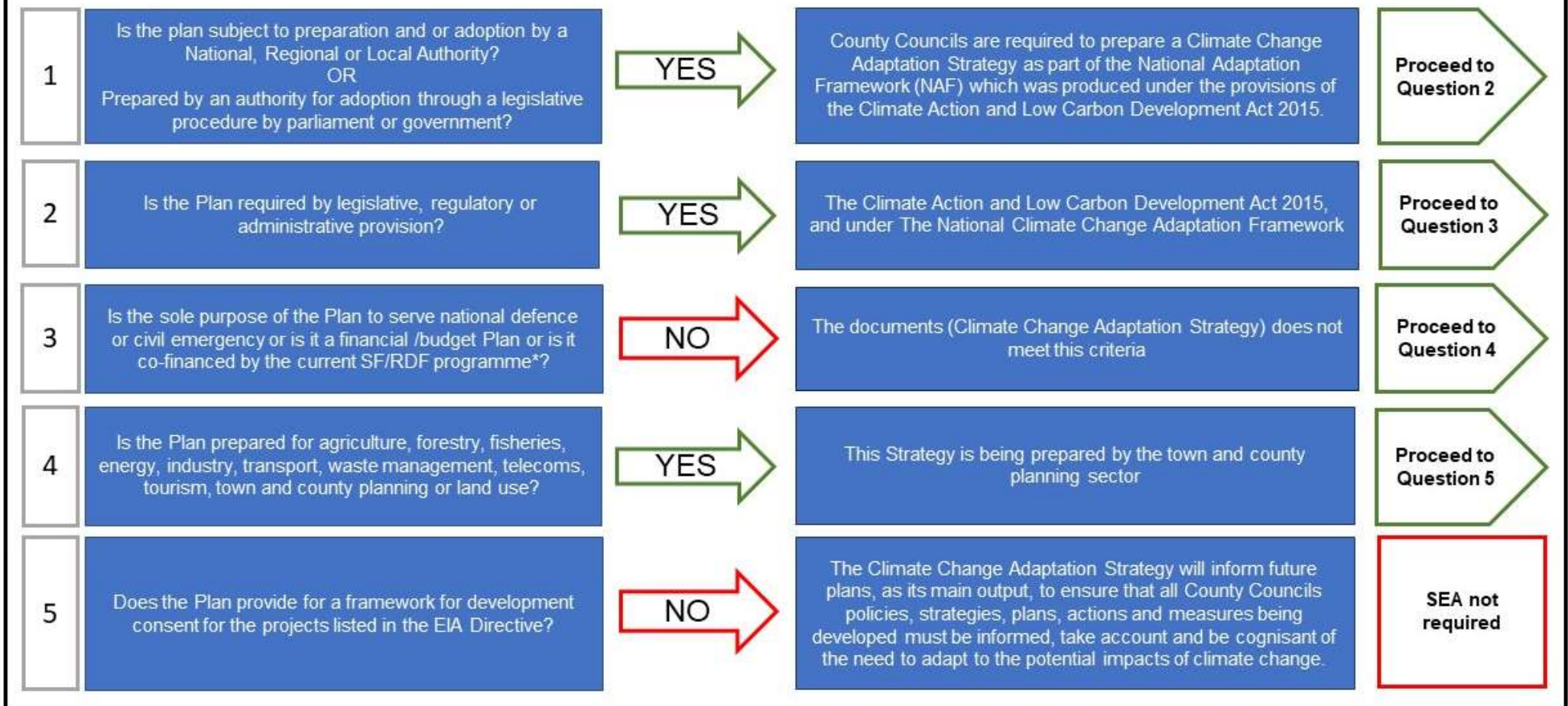
In order to determine if this Strategy is considered a plan/programme under Article 3 of the SEA Directive, a pre-screening check is necessary. Figure 1 below provides details of the pre-screening checklist; this checklist is based on the decision tree published by the EPA in the *Development of SEA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

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<sup>3</sup> 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

<sup>4</sup> 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

### Pre-Screening Decision Process



\*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 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 3 SCREENING DETERMINATION FOR ANNEX II (1.), CRITERIA FOR DETERMINING THE LIKELY SIGNIFICANCE OF EFFECTS**

<b>The Characteristics of the Plan and Programmes having regard, in particular, to, the following criteria</b>	
<b>Criteria</b>	<b>Screening Determination</b>
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 Leitrim County associated with climate change, and to set strategic goals, objectives and actions to adapt to these changes.</p> <p>Leitrim 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>Leitrim 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 Leitrim 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 Leitrim 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</p>

	<p>plans for Leitrim 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>
Environmental problems relevant to the plan or programme;	<p>The Climate Change Adaptation Strategy looks to integrate climate change adaptation into Leitrim 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 Leitrim 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>
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>As the Climate Change Adaptation Strategy is aimed at integrating climate change adaptation into identified Leitrim 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 Leitrim 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 Leitrim County Council must be informed of the need to adapt to the potential impacts of climate change.</p>

**TABLE 4 SCREENING DETERMINATION FOR ANNEX II (2.), CRITERIA FOR DETERMINING THE LIKELY SIGNIFICANCE OF EFFECTS**

<b>Characteristics of the Effects and of the Area Likely to be Affected, taking account of the following criteria</b>	
<b>Criteria</b>	<b>Screening Determination</b>
The probability, duration, frequency and reversibility of the effects	Leitrim 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.
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 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 Leitrim County Council must be informed of the need to adapt to the potential impacts of climate change.
<p>The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)</p> <ul style="list-style-type: none"> <li>- <i>special natural characteristics or cultural heritage;</i></li> <li>- <i>exceeded environmental quality standards or limit values; and</i></li> <li>- <i>intensive land-use.</i></li> </ul>	<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 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 Leitrim 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 programmes.

## **APPENDIX 1 CLIMATE CHANGE ADAPTATION STRATEGY – ACTIONS**



Theme 1 (G1) Local Adaptation Governance and Business Operations	Actions
1	Establish an adaptation Steering Group with representatives from across key functions of the local authority to ensure the successful implementation of the actions of this Climate Change Adaptation Plan and to report on progress.
2	Mainstream Climate Action policy as an integral consideration in the Corporate Plan objectives, providing for all local authority activities and the delivery of functions and services across the administrative area.
3	<p>Undertake a Business Continuity Plan to identify and address specifically, the impacts associated with extreme weather events on all functions/services of local authority including:</p> <ul style="list-style-type: none"> <li>• Prepare, adopt and update a “Major emergency Plan”</li> <li>• Prepare and adopt a Policy and Procedure for the Management of the Local Authority Response to Storms SMS PP S12</li> <li>• Prepare a Winter Maintenance Plan</li> <li>• Provide necessary resources to implement these plans</li> <li>• Preparing for critical services disruptions</li> <li>• Mitigating/Minimising the impact of service disruption and,</li> <li>• Improving the capacity/ability to recover.</li> </ul>
4	Updating Health and Safety Policies to reflect the learning from extreme weather events/changing climate
5	Promoting Green Procurement
6	Reflect the learning from climate change in budget preparation
7	Climate Change training, awareness and capacity building for staff, elected members and local communities
8	Liaise, collaborate and work in partnership with the sectors identified in the NAF, 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 Building on adaptation planning actions set out in this strategy, support and compliment the practical implementation of actions arising from the National Climate Action Plan – to Tackle Climate Breakdown (as revised and updated annually), across the broad range of functions of the local authority to achieve the national climate ambition i.e. decarbonisation targets to 2030 and objectives to 2050.
9	Develop procedures and templates to ensure that the financial aspects of extreme weather are collated, recorded and reported to operational and senior management team

<b>Theme 2 (G2) Infrastructure and Built Environment</b>	<b>Actions</b>
<b>10</b>	Apply a robust risk assessment and management framework to Local Authority owned buildings and properties to identify and protect against the key vulnerabilities to the impacts of climate change and mitigate against service disruption. This is subject to the availability of funding.
<b>11</b>	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.
<b>12</b>	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. For projects subject to funding and investment of public money, include climate change considerations as criteria for assessment ultimately ensuring that community projects are designed and developed to be climate resilient and/or are proactive in promoting and working positively towards climate action
<b>13</b>	For projects subject to funding and investment of public money, include climate change considerations as criteria for assessment ultimately ensuring that community projects are designed and developed to be climate resilient and/or are proactive in promoting and working positively towards climate action
<b>14</b>	Incorporate landscaping and planting into the planning and design of all major infrastructure developments in the county.

Theme 3 (G3) Landuse and Development	Actions
15	Identify and integrate climate change as a critical consideration and guiding principle informing core strategy of the County Development Plan.
16	Integrate and promote climate-smart building and urban design performance outcomes in development standards through the development management process.
17	Promote the integrated planning, design and delivery of green infrastructure (including urban greening) through appropriate provisions in planning policies, County Development Plan, Town Plans, development standards, infrastructural, public realm and community projects.
18	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;

Theme 4 (G4) Drainage and Flood Management	Actions
19	<p>Support OPWs CFRAMS Plans for the 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.</p> <p>Identify and rectify where possible recurring flooding issues on local roads.</p>
20	<p>Stipulate the requirement for the design and specification of urban storm-water drainage systems. Sustainable Urban Drainage Systems (SuDS) for new development to take account of the potential future impact of climate change.</p>
21	<p>Incorporate the requirement for Sustainable Urban Drainage Systems (SuDS) where appropriate in local authority projects.</p>
22	<p>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 &amp; OPW, 2009).</p>

Theme 5 (G5) Natural Resources and Cultural Infrastructure	Actions
23	Develop a strategy to undertake and implement an active native 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 as aesthetic value.
24	Integrate natural borders/buffers/native species, to be included as an integral component of the design of greenways/blueways, tracks and trails and amenity areas to promote natural enhancement.
25	Review Bio-diversity Plans / habitat conservation strategies, plans and projects to ensure that: -all risks from adverse climate change have been identified; -future changes are assessed and measures employed to address issues identified -carbon capture within habitats is considered.
26	Develop an inventory of wetlands within the local authority area to identify sites which aid flood mitigation
27	Support the work of other agencies in the 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.
28	Consider all risks from adverse climate change, when carrying out works on historic buildings and other heritage and cultural assets within the remit of the Local Authority

<b>Theme 6 (G6) Community Health and Wellbeing</b>	<b>Actions</b>
<b>29</b>	Through public participation network, raise awareness of the impacts of climate change and ways for communities to increase their response and resilience to these impacts.
<b>30</b>	Support communities across the county in addressing their vulnerability to the impacts of climate change.
<b>31</b>	Integrate climate change into the strategy of future LECs and ensure that actions contained within the LECs are integrated with climate action initiatives as part of their delivery, implementation and review.
<b>32</b>	Ensure that grants to communities fund climate resilient projects

Theme 7 (G7) Economic Development	Actions
33	Identify, source and leverage funding streams for the active implementation of adaptation actions and measures across County Leitrim with an emphasis on capitalising on opportunities that will contribute both environmentally and economically to the area
34	Through the work of the Leitrim Local Enterprise Office, support, encourage and nurture new ideas seeking to capture opportunities associated with environmental and technological advances that support local carbon transition
34	In line with the strategic objective of the Local Enterprise Development Plan Leitrim 2017-2020, actively contribute towards development of renewable energies and energy efficiency.
36	Develop a Climate Change Awareness Plan/Campaign for business and start-up firms to inform of climate action measures that can be integrated into business activities.
37	Explore innovative ways of stimulating interest and creating awareness about climate change in the business community.
38	Work with the County Leitrim LEADER Partnership to support and develop adaptation actions in communities to benefit local economies and promote innovation at local level through climate change
39	In line with the strategic objectives of the Leitrim Local Economic & Community Plan, to promote and enhance the potential for economic development in the energy and green economy sector. Encourage and promote projects that will contribute positively and grow the Circular and Bio-economy to promote sustainable rural and urban economic development as part of the overall aim of transiting to a low carbon economy
40	Encourage and promote projects that will contribute positively and grow the Circular and Bio-economy to promote sustainable rural and urban economic development as part of the overall aim of transiting to a low carbon economy