

# Strategic Environmental Assessment Screening Report

For

**Climate Change Adaptation Strategy for Kilkenny  
County Council**

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

September 2019

**ON BEHALF OF**

**Climate Action Regional Office (CARO)**

Prepared by

**Enviroguide Consulting**

 *Dublin*

3D Core C, Block 71, The Plaza,  
Park West, Dublin 12

 *Kerry*

19 Henry Street  
Kenmare, Co. Kerry

 [www.enviroguide.ie](http://www.enviroguide.ie)

 [info@enviroguide.ie](mailto:info@enviroguide.ie)

 +353 1 565 4730



## DOCUMENT CONTROL SHEET

Revision	Status	Author(s)	Reviewed	Approved	Issue Date
1.0	Draft	Mairead Foran <i>Environmental Consultant</i>	Jim Dowdall <i>Director</i>	Jim Dowdall <i>Director</i>	18/04/2019
2.0	Draft for Consultation	Mairead Foran <i>Environmental Consultant</i>	Muriel Ennis <i>Principal Consultant</i>	Muriel Ennis <i>Principal Consultant</i>	29/05/2019
3.0	Final	Mairead Foran <i>Environmental Consultant</i>	Muriel Ennis <i>Principal Consultant</i>	Muriel Ennis <i>Principal Consultant</i>	13/09/2019

## TABLE OF CONTENTS

<b>1</b>	<b>INTRODUCTION .....</b>	<b>1</b>
1.1	BACKGROUND .....	1
<b>2</b>	<b>LEGISLATIVE CONTEXT .....</b>	<b>1</b>
2.1	STRATEGIC ENVIRONMENTAL ASSESSMENT .....	1
2.2	CLIMATE CHANGE ADAPTATION .....	2
2.2.1	<i>International Context</i> .....	2
2.2.2	<i>EU Context</i> .....	2
2.2.3	<i>National Context</i> .....	2
2.3	KILKENNY'S CLIMATE CHANGE ADAPTATION OBJECTIVES .....	3
2.4	CONSULTATION .....	4
2.4.1	<i>Environmental Authorities</i> .....	4
2.4.2	<i>Public Consultation</i> .....	4
2.4.3	<i>Summary of Consultation submissions</i> .....	5
2.5	APPROPRIATE ASSESSMENT .....	10
<b>3</b>	<b>DETERMINING WHETHER AN SEA IS REQUIRED .....</b>	<b>10</b>
3.1	THE REQUIREMENT TO CARRY OUT SEA – PRE-SCREENING CHECKLIST .....	10
<b>4</b>	<b>SEA SCREENING DETERMINATION .....</b>	<b>12</b>
<b>5</b>	<b>CONCLUSION .....</b>	<b>14</b>
	<b>APPENDIX 1 CLIMATE CHANGE ADAPTATION STRATEGY - ACTIONS .....</b>	<b>15</b>

## LIST OF TABLES

Table 1 Kilkenny's Climate Change Adaptation Strategy Objectives .....	3
Table 2 Summary of Consultation Submissions and Responses .....	5
Table 3 Screening determination for Annex II (1.), Criteria for determining the likely significance of effects .....	12
Table 4 Screening determination for Annex II (2.), Criteria for determining the likely significance of effects .....	14

## LIST OF FIGURES

Figure 1 Pre-Screening Decision Process .....	11
---	----

# 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 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 has been produced under the provisions of the Climate Action and Low Carbon Development Act 2015.<sup>1</sup>

An aim of the Climate Change Adaptation Strategies is to mainstream 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 is to ensure 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, among other things, 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

---

<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

Planning and Development (SEA) Regulations 2004 (S.I. No. 436 of 2004) needs to be considered while drafting of the Climate Change Adaptation Strategies.

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 also been 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°C above the pre-industrial level and pursuing efforts to limit the temperature increase to 1.5°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 for 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, an 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 Kilkenny County Council has been consistent with these guidelines.

## 2.3 Kilkenny's Climate Change Adaptation Objectives

The purpose of the Kilkenny 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, Kilkenny County Council has set out a number of key objectives in their strategy, under five thematic principles. Table 1 below outlines Kilkenny County Council's Climate Change Adaptation Strategy objectives per theme.

**TABLE 1 KILKENNY'S CLIMATE CHANGE ADAPTATION STRATEGY OBJECTIVES**

<b>Energy and Buildings</b>
To reduce energy related CO <sub>2</sub> emissions of Kilkenny County Council.
To explore improvements in energy efficiency and help identify value for money in energy spending across the council.
To support the increase of renewable energy produced in council operations.
To support the reduction of energy imported by the County.
To progress Kilkenny County Council's own energy efficiency and renewable energy projects/ programmes and continue to communicate these experiences to inform best practice across all sectors.
To support the improvement of quality of life and thermal comfort for residents in social houses to help reduce the risk of fuel poverty.
To increase the awareness and understanding amongst stakeholders and the general public of the objectives of Kilkenny County Council's Adaptation Plan.
<b>Flood Resilience</b>
To mitigate the risk and impact of flooding.
To provide and plan for effective drainage systems.
To liaise and work with other bodies, agencies responsible for the management of water courses.
<b>Resource Management</b>
To liaise and work with other bodies and agencies responsible for resource management.
To promote and maximise resource management initiatives.
To integrate climate action considerations into waste management policies.
To identify and support opportunities that may arise from pursuing adaptation efforts through the functions of Kilkenny County Council.
<b>Transport</b>
To increase the resilience of roads and transport infrastructure.
To ensure that climate adaptation is mainstreamed into all transport activities and operations within Kilkenny County Council and the wider community.
To build resilience within Kilkenny County Council to support a modal shift among council staff.
To identify and support opportunities that may arise from pursuing modal shift efforts through the functions of Kilkenny County Council.

To collaborate with other agencies and groups working with communities to enhance the awareness and effectiveness of community programmes related to modal shift.
<b>Nature-Based Solutions &amp; Communities</b>
To build capacity and resilience within communities.
To collaborate with other agencies and groups working with communities to enhance the effectiveness of community programmes related to climate change.
To protect and encourage climate resilient community Infrastructure.

## 2.4 Consultation

### 2.4.1 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 (Kilkenny 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*.

Kilkenny County Council on the 8<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);
- Department Agriculture, Food and Marine;
- Department Communications, Climate Action and Environment; and
- Department of Culture, Heritage and the Gaeltacht.

### 2.4.2 Public Consultation

Post Environmental Authority consultation, Kilkenny County Council conducted a five-week period from 7<sup>th</sup> June 2019 to 12<sup>th</sup> July 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:

- Newspaper Notice in the Kilkenny People and Munster Express;
- Notification placed on <https://consult.kilkenny.ie>;
- Documents placed on Public Display at the following:
  - Reception, Kilkenny County Council, County Hall, John St., Kilkenny;
  - The Tholsel, Kilkenny City Area Office, High St, Kilkenny;
  - Callan Area Office, Clonmel Road, Callan, Kilkenny;
  - Castecomer Area Office, Kilkenny St., Castlecomer, Kilkenny;

- Ferrybank Area Office, Ferrybank Shopping Centre, Ferrybank, Co.Kilkenny;
- Thomastown Area Office, Ladyswell, Thomastown, Kilkenny
- Engagement with adjoining Local Authorities:
  - Tipperary County Council;
  - Waterford County Council;
  - Wexford County Council;
  - Carlow County Council; and
  - Laois County Council.
- 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 review the local authority adaptation strategies and to make submissions.

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

- The Office of Public Works (OPW);
- Irish Water;
- Department of Agriculture, Food and the Marine;
- An Taisce;
- Kilkenny LEADER Partnership;
- Gas Networks Ireland;
- Environmental Protection Agency (EPA);
- Francis Micklem;
- Green Energy Solutions;
- Ronan Beasley;
- Lucy Glendinning;
- Sadhbh O'Neill; and
- Kilkenny for Climate Action.

### 2.4.3 Summary of Consultation submissions

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

**TABLE 2 SUMMARY OF CONSULTATION SUBMISSIONS AND RESPONSES**

Organization / individual	Summary submission	Kilkenny Co. Co. response
OPW	<ul style="list-style-type: none"> <li>• Acknowledges risk of groundwater flooding in inland areas.</li> <li>• Recommends including references to the Mid-Range and High-End Future Scenarios assessed under the CFRAM study.</li> <li>• Suggests change reference for flood maps in Section 4.1.3</li> <li>• OPW unaware of future plans to collaborate with KCC on Flood Awareness Campaigns.</li> </ul>	<ul style="list-style-type: none"> <li>• Alter wording in Table 3.3 to include inland vulnerability to groundwater flooding.</li> <li>• Include narrative in Section 4.1.4: "The National CFRAM Programme and parallel projects include the assessment of risk for two potential future scenarios; the Mid-Range Future Scenario (MRFS) and the High-End Future Scenario (HEFS). These detail parameters such as extreme rainfall depths, peak</li> </ul>



	<ul style="list-style-type: none"> <li>• Recommends alter wording to Flood Defence and Relevant Legislation in Section 5.2.</li> <li>• Recommends alter list of Relevant Resource Management Legislation to remove unrelated acts.</li> </ul>	<p>flood flows and mean sea level rise for river basins throughout Ireland.”</p> <ul style="list-style-type: none"> <li>• Change reference in Section 4.1.3 to floodinfo.ie</li> <li>• Amend wording in Section 5.2.3 to acknowledge areas of the county that are not suitable to soft engineering solutions.</li> <li>• Change title of Relevant Legislation in Section 5.2.3 to 'Relevant Plans/Legislation'. Remove unrelated acts under Section 5.3.3 'Relevant Legislation', as appropriate.</li> </ul>
Irish Water	<ul style="list-style-type: none"> <li>• Looks forward to implementing measures in the Government Climate Action Plan and Draft Climate Change Sectoral Adaptation Plan: Water Quality and Water Services Infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>• Submission from Irish Water is noted and no further action is required.</li> </ul>
Department of Agriculture, Food and the Marine	<ul style="list-style-type: none"> <li>• Highlights increased inclusion of agricultural sector in CCAS.</li> <li>• Recommends removing reforestation from CO2 emission list in Section 1.2.3.</li> <li>• Highlights risk of increased number of wildfires due to climate change.</li> <li>• Highlights increased risk of slurry runoff and soil sediment into water-courses.</li> <li>• Raised concerns regarding escalation of spread of non-native and invasive species.</li> <li>• Recommends inclusion of agricultural sector as a stakeholder in energy section.</li> <li>• Suggests the acknowledgement of the agricultural sectors role to play in Nature-Based Solutions.</li> </ul>	<ul style="list-style-type: none"> <li>• Include narrative under Section 2.1.4 to include the agricultural sector in the CCAS. Alter wording in Section 1.2.3 to remove reforestation from greenhouse gas sources.</li> <li>• Include farming community under Section 5.1 'Stakeholders to work with and influence'.</li> <li>• Updated Action 4 in Section 5.5.7 to: <i>Support the greening of businesses, festivals and agricultural practices through workshops and campaigns.</i></li> </ul>
An Taisce	<ul style="list-style-type: none"> <li>• Encourages use of natural materials.</li> <li>• Suggests consideration of additional recycling facilities.</li> <li>• Encourages use of public transport.</li> <li>• Highlights commitment to get to near zero carbon emission by 2050.</li> <li>• Encourages biodiversity in the agricultural industry.</li> </ul>	<ul style="list-style-type: none"> <li>• Submission from An Taisce is noted and no further action is required.</li> </ul>
Kilkenny LEADER Partnership	<ul style="list-style-type: none"> <li>• Suggests the inclusion of an action to develop community engagement with CCAS.</li> </ul>	<ul style="list-style-type: none"> <li>• Change wording on Section 5 introductory graphics pages from 'Stakeholders</li> </ul>

	<ul style="list-style-type: none"> <li>• Support the sustainable development of infrastructures.</li> <li>• Commends CCAS on easy-to-understand language.</li> <li>• Recommends rewording of section titles on introductory graphics pages in Section 5.</li> <li>• Suggests incorporation for 4 specific actions into CCAS.</li> </ul>	<p>to work with and influence' to 'Stakeholders to work with in partnership and co-create solutions'.</p> <ul style="list-style-type: none"> <li>• Include an action in Section 5.5.7 as follows: <i>Explore the opportunities within County Kilkenny to create, improve and enhance ecosystems through nature-based solutions.</i></li> </ul>
Gas Networks Ireland	<ul style="list-style-type: none"> <li>• Promotion of anaerobic digestion plants and renewable gas infrastructure in Kilkenny.</li> <li>• Suggests KCC should consider renewable gas as a viable option to improve energy efficiency across the council.</li> <li>• Recommends consideration of Compressed Natural Gas (CNG) fueled buses and support the development of CNG infrastructure in Kilkenny.</li> <li>• Suggests considering the role that renewable gas and CNG can play in reducing CO2 emissions.</li> </ul>	<ul style="list-style-type: none"> <li>• Alter wording in Action 2 of Section 5.4.7 to include more options than just electric vehicles. Action updated to the following: <i>Explore the potential for expanding the KCC fleet with energy efficient amenity vehicles.</i></li> <li>• Include action in Section 5.1.2 as follows: <i>Investigate the feasibility of developing anaerobic digestion and renewable gas infrastructure in County Kilkenny.</i></li> </ul>
EPA	<ul style="list-style-type: none"> <li>• Recommends considering an additional adaptation goal to recommend behavioral changes through sustainable policy's and measures;</li> <li>• Highlights that opportunities should be sought to align with and collaborate with adjacent local authorities;</li> <li>• Suggests considering an additional goal reflecting the need for effective implementation of relevant related regulations policies, plans and strategies;</li> <li>• Suggests amending text to native tree planting in Section 5.5.7 Tree Management Action 8;</li> <li>• Recommends additional action to protect natural and cultural assets.</li> </ul>	<ul style="list-style-type: none"> <li>• Include action in Section 5.2.3 as follows: <i>Monitoring of flood &amp; storm damage to historic structures in collaboration with National Monuments Services and other national &amp; local agencies.</i></li> <li>• Include the following text in Section 1.2.6: "This adaptation strategy commits to aligning with national commitments on climate change adaptation. It must be noted that the process of making 12 sectoral adaptation strategies (identified in the NAF) is running concurrently with the making of local authority strategies. Once published, however, any relevant recommendations or actions will be incorporated into this strategy. For both the preparation of this strategy and the implementation of actions, opportunities will be advanced to align with and collaborate with adjoining local authorities including Laois, Tipperary, Waterford, Wexford &amp; Carlow".</li> </ul>
Francis Micklem;	<ul style="list-style-type: none"> <li>• Suggests the strategy has side-stepped mitigation.</li> </ul>	<ul style="list-style-type: none"> <li>• The rest of the submissions are noted, no action is required for strategy.</li> </ul>

<p>Green Energy Solutions;</p> <p>Ronan Beasley;</p> <p>Lucy Glendinning;</p> <p>Sadhbh O'Neill;</p> <p>Kilkenny for Climate Action</p>	<ul style="list-style-type: none"> <li>• Feels CCAS is lacking a strategic, cohesive plan with ambitious actions.</li> <li>• Questions how the CCAS will be implemented?</li> <li>• Advises that the proposed strategy does not go far enough regarding mitigation actions.</li> <li>• Suggests there is an emphasis on adaptation over mitigation.</li> <li>• Suggests encouragement for innovative projects to recycle plastics.</li> <li>• Suggests outlaw use of single-use plastic.</li> <li>• Advises the banning of single-use plastics in KCC and ensure zero-waste policy at public events.</li> <li>• Highlights that reduction rather than recycling needs to be the new emphasis.</li> <li>• Emphasizes litter awareness strategy to be revised</li> <li>• Recommends supporting renewable energy and low impact projects.</li> <li>• Suggests creating commercial opportunities within Kilkenny.</li> <li>• Suggests appointing Director of Climate Change and Adaptation within KCC.</li> <li>• Encourages sustainable, environmentally friendly practices in County Kilkenny.</li> <li>• Suggests outright cessation of spraying and use of chemicals in County Kilkenny.</li> <li>• Emphasizes tree management strategy crucial to encouraging biodiversity and native tree planting in Co. Kilkenny.</li> <li>• Encourages the use of nature-based solutions to flooding and recognise the importance of biodiversity.</li> <li>• Suggests ceasing use of glyphosate by KCC.</li> <li>• Suggests reduce mowing in public spacing.</li> <li>• Encourages the development of a bus scheme in Kilkenny.</li> </ul>	<ul style="list-style-type: none"> <li>• Include an action in Section 5.3.3 as follows: <i>KCC carries out an environmental advertisement campaign to promote awareness among all age groups of ongoing and future waste reduction and recycling projects on an annual basis.</i></li> <li>• Change the timeline for action 9 in section 5.5.7 from medium to short, and change the lead department from the Parks Department to Multi-departmental.</li> <li>• Change timeframe of action 8 in Section 5.4.7 from medium to short.</li> <li>• Amend wording of Action 17 in Section 5.4.7 to the following: <i>Promote pedestrian priority within the city centre.</i></li> <li>• Include action in Section 5.3.3 as follows: <i>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></li> <li>• Include narrative in Section 5.2.2: “The impacts of flooding can be devastating to properties, business, infrastructure, cultural heritage and the natural environment. It is likely that climate change will have a considerable impact on flood risk in the future for Kilkenny, with projections indicating that the number of heavy rainfall days per year may increase, which could lead to an increase in flood risk across the city and county. While there is considerable uncertainty associated with most aspects of the potential impacts of climate change on water quality and flood risk, it will be prudent from this point on for the Council to take the potential for change into further account in dealing with water quality, the design and development of local drainage systems and flood risk management measures.”</li> </ul>
---	--	---

	<ul style="list-style-type: none"> <li>• Encourages reduced use of car travel and promotion of walking, cycling and public transport infrastructure.</li> <li>• Suggests improving public transport connectivity between urban and rural areas.</li> <li>• Recommends renewed focus on the pedestrianisation within Kilkenny city centre.</li> <li>• Recommends that the Climate Change Adaptation Plan should be amended accordingly so the policies and initiatives mirror those of the National Climate Change Plan.</li> <li>• Suggests the removal of destructive industries from County Kilkenny.</li> <li>• Suggests providing funding and support for organic, low-impact projects.</li> <li>• Recommends using national money to help biodiversity and society recover.</li> <li>• Encourages reuse of greywater in private and commercial developments.</li> <li>• Raised concerns regarding future development causing flooding.</li> <li>• Recommends assigning contracts on an environmental, not financial, merit.</li> <li>• Raised concerns regarding urgency of implementation of actions.</li> <li>• Disappointed to note large number of actions with budget to be confirmed.</li> <li>• Recommends liaising with schools in relation to climate change and biodiversity.</li> <li>• Highlights the education of public to recycling, climate change, waste reduction and tree management.</li> <li>• Suggests supporting businesses with developing their Green Economy initiatives</li> <li>• Recommends improving energy efficiency within KCC.</li> <li>• Council energy efficiency and greenhouse gas database to be confirmed.</li> <li>• Concerned Home Energy Saving Kits are of little benefit.</li> <li>• Suggests reducing the national herd.</li> <li>• Requested confirmation why full SEA has not been required.</li> </ul>	<ul style="list-style-type: none"> <li>• Insert new action in Section 5.3.3 as follows: <i>Provide information to the private sector on low carbon/green priorities for prospective tenderers to the council and evaluate tenders against green credentials and environmental record.</i></li> <li>• Change timeframe for action 3 of Section 5.5.7 from medium to short.</li> <li>• Include action in Section 5.5.7 as follows: <i>Through the Environment Section of Kilkenny County Council, KCC will build expertise, capacity and increase knowledge base through relevant training programmes on Climate Change and its implications on the operations/functions of Kilkenny County Council.</i> <i>Training courses/modules/programmes may include:</i> <ul style="list-style-type: none"> <li>▪ <i>Climate Change awareness training to staff, elected members and communities</i></li> <li>▪ <i>Invasive species awareness and management training</i></li> <li>▪ <i>Relevant safety training</i></li> <li>▪ <i>Staff training for outdoor staff in service delivery in flood situations.</i></li> </ul> </li> <li>• Alter wording in action 4 of Section 5.5.7 to include engagement with the farming community.</li> </ul>
--	--	---

	<ul style="list-style-type: none"><li>• Recommends engaging with farming community to reduce carbon footprint and encouraging biodiversity.</li></ul>	
--	---	--

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

## 2.5 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 Kilkenny 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 Kilkenny's Climate Change Adaptation Strategy.

## 3 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.

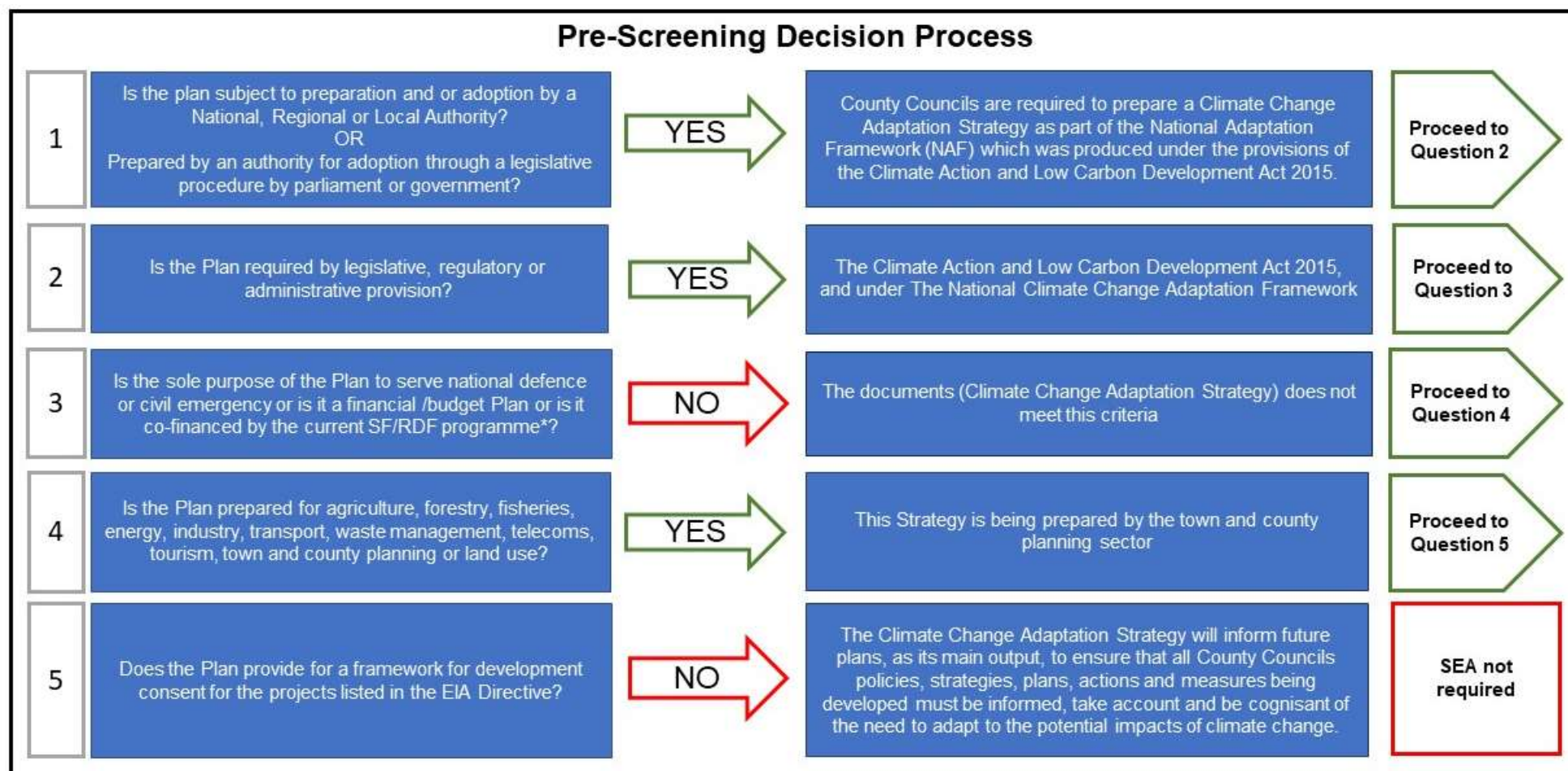
### 3.1 The requirement to carry out SEA – Pre-Screening Checklist

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>

<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





\*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

## 4 SEA SCREENING DETERMINATION

The Climate Change Adaptation Strategy was screened using the criteria contained in Annex II of the SEA Directive. Table 3 and Table 4 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 Kilkenny County associated with climate change and to set strategic goals, objectives and actions to adapt to these changes.</p> <p>Kilkenny County Councils 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>Kilkenny County Councils 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 Kilkenny 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 Kilkenny 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 Kilkenny 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 Kilkenny 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 Kilkenny 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 Kilkenny 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 Kilkenny 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 Kilkenny 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	Kilkenny 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 Kilkenny County Council must be informed of the need to adapt to the potential impacts of climate change.
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"> <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>	Individual policies, strategies, plans and measures must be considered individually under the SEA, EIA and/or AA process.
The effects on areas or landscapes which have a recognised national, community or international protection status.	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.

## 5 CONCLUSION

This SEA Screening Report was carried out in order to determine the need for a Strategic Environmental Assessment for Kilkenny 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: Energy and Buildings	Actions
1	Create climate adaptation and energy master plan for Kilkenny
2	Integrate climate adaptation and energy actions in the new <i>Kilkenny County Development Plan 2020-2026</i>
3	Continued support and lead applicant for the SEAI Better Energy Communities
4	Communicate and adhere to statutory requirements relating to the architectural interests of historic buildings and impacts of service upgrades, when assessing for suitable solutions to increasing energy performance of a building
5	Undertake Energy Audit of Historic structures in the ownership of the Local Authority, providing a common template for audit or assessment of works
6	Develop policy in the City & County Development Plan to promote local materials and use of sustainable, low carbon footprint materials instead of those that require intense high temperature and carbon emissions
7	Develop policy in the City & County Development Plan to promote and advise for the use of environmentally friendly material and appropriately designed new buildings, which utilise orientation, shelter, sun, light, etc. in design details
8	Encourage further research and pilot schemes for the deep retrofit of historic properties while assessing whole life durability of products and embodied energy of historic buildings
9	Undertake feasibility study and gap analysis of development of ISO 50001 compliant energy management system
10	Annual Monitoring & Reporting to SEAI on energy and carbon use.
11	Publish Climate Action and Energy Review annually.
12	Reduce the need for "Grey adaptation" measures, for example, identifying sites for trialling renewable energy projects.
13	Produce a Climate Adaptation and Energy efficiency plan for all council owned and operated buildings (e.g. Fire, Library, Sports, Roads and Transport and Corporate Buildings).
14	Develop a Public Lighting Upgrade Plan.
15	Complete feasibility study on district heating systems for Urban Regeneration projects.
16	Investigate rolling out the installation of PV panels on all Kilkenny County Council buildings.
17	Investigate potential for BioEnergy projects in Dunmore Civic Amenity Site.
18	Establish a carbon saving register.
19	Investigate the feasibility of developing anaerobic digestion and renewable gas infrastructure in County Kilkenny.
20	Work with CARO on research and project proposals for grant funding.
21	Work with third level institutes on climate adaptation research projects.
22	Develop research and funding opportunities for climate adaptation, renewable and energy efficiency projects.
23	Engage with students on climate change through CPD programme/ Engineers Week/Science Week.
24	Provide citizens with energy awareness material in public buildings. Also providing the Home Energy Saving Kits in KCC's public libraries to help members improve energy efficiency in their homes.
25	Provide County Council tenants with climate adaptation awareness materials at home, particularly at time of taking up new tenancy.
26	Provide sufficient guidance to the Kilkenny City & County Development Plan (2020-2026) to ensure renewable energy projects, including projects for wind-, solar- and bio-energy can be progressed throughout the County without significant impacts on the landscape, amenity, heritage and the environment.
27	Organise Deep Retro fit training for staff in various sections of KCC.
28	Noted objective under Climate Action Plan 2019 to establish a number of pilot 'climate action community engagement' offices in a number of Local Authorities

Theme: Flood Resilience	Actions
1	Continually update the Emergency Response Plan.
2	Explore the potential of working in partnership with OPW, with regard to Flood Awareness Campaigns.
3	Monitoring of flood forecasting and warning system.
4	Implement Sustainable Urban Drainage Guidelines in council buildings where feasible.
5	Liaise, collaborate and work in partnership with OPW, with regard to flood protection schemes.
6	Assess the potential of soft engineering methods in future flood defence schemes.
7	Carry out yearly risk workshops to assess impacts on council services.
8	Investigate the feasibility of developing integrated constructed wetlands within Kilkenny.
9	Monitoring of flood, storm and climate change damage to historic structures in collaboration with National Monuments Services and other national & local agencies.

Theme: Resource Management	Actions
1	Encourage staff to reduce paper usage through an awareness campaign.
2	Run an ongoing recycling awareness campaign for council staff.
3	Promote recycling to householders through a range of workshops, talks and programmes.
4	Develop a climate change awareness procedure code for all new staff.
5	Investigate waste prevention measures to decrease waste generation within the LA offices.
6	Promote recycling & waste prevention to householders through a range of workshops, talks and programmes.
7	Reduce litter pollution in watercourses throughout Kilkenny in association with the Local Authorities Water Programmes.
8	Assess the practicality of introducing environmentally friendly waste containers in Kilkenny City.
9	Develop pilot recycling projects.
10	Develop guidelines for “sustainable, low carbon events” to inform and guide event organisers.
11	Phase out single use food and beverage containers in KCC buildings and at KCC events.
12	Examine methods of conserving water in KCC buildings.
13	Ensure newly implemented waste collection systems are utilised in high population areas around Kilkenny.
14	Liaise with LAWPRO to evaluate water quality issues around Kilkenny.
15	Expand the use of Green Public Procurement and aim to seek to procure goods, services and works with a reduced environmental impact throughout their life cycle.
16	Develop an environmental advertisement campaign to promote awareness among all age groups of ongoing and future waste reduction and recycling projects
17	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
18	Continue to identify suitable locations to extend the existing bring centre recycling facilities

Theme: Transport	Actions
1	Develop strategy to convert fleet to low emission vehicles.
2	Explore the potential for expanding the KCC fleet with energy efficient amenity vehicles.
3	Investigate ways to carry out a modal shift of staff within Kilkenny County Council from private car to more sustainable modes of transport to reduce emissions from private car.
4	Investigate the feasibility of a hot desk policy in Council Offices to reduce travel to work by commuting staff.
5	Promote carbon friendly modes of transport to work.
6	Provide welfare facilities at KCC offices to encourage alternate modes of transport to work.
7	Identify gaps in the cycle route provision for the full extent of the cycle network up to the city centre gateways to make it safer and easier to cycle within the city.
8	Continue the upkeep of cycle/walkways around County Kilkenny.
9	Promote World Car Free Day and European Mobility Week to increase awareness of climate friendly modes of transport.
10	Accommodate where possible the provision of additional EV charging points.
11	Re-establish Smarter Travel Committee to ensure continued development of transport facilities in Kilkenny.
12	Prepare mobility management plans for the district towns to encourage more climate friendly sustainable modes of transport.
13	Develop mobility management plans with the schools in the City and Environs.
14	Investigate the feasibility to increase the number of public bike parking facilities in County Kilkenny.
15	Liaise, collaborate and work in partnership with NTA in the implementation of Kilkenny public transport schemes where feasible.
16	Implement policy to increase modal shift to public transport.
17	Promote pedestrian priority at events within the city centre.
18	Investigate the feasibility of evolving public bus facilities in rural areas.

Theme Nature-Based Solutions & Communities	Actions
1	Continued commitment to Community Environment Action Fund through supporting the work of Tidy Towns and Amenity Grants. (Priority given to biodiversity and climate change initiatives)
2	Support of litter awareness and litter cleanup through supporting the National Spring Clean with An Taisce.
3	Support climate change adaption in schools with the Green Schools Flags, biodiversity and heritage initiatives, and pollinator friendly plans.
4	Support the greening of businesses, festivals and agricultural practices through workshops and campaigns.
5	Develop and support programmes which encourage active participation in identifying, recording, protecting, communicating and enjoying Kilkenny's heritage.
6	Continue to develop public-use amenity trails throughout Kilkenny county.
7	Investigate the potential of implementing public open space projects and policy.
8	Investigate the feasibility of using a green roof concept for a Council building where appropriate.
9	Development and implement a tree management plan for Kilkenny City.
10	Assess and encourage, where possible, pollinator friendly and native tree planting throughout Kilkenny.
11	Encourage educational institutions to adopt policies in accordance with National Tree Week and National Tree Day.
12	Investigate the use of the DAFM NeighbourWood Planting scheme for use in suitable urban areas.
13	Explore the potential of tree planting in areas of hard landscaping.
14	Develop a cross section Kilkenny County Council Invasive Alien Species Action Plan
15	Investigate the feasibility of composting on a large scale at Dunmore Recycling and Waste Disposal Centre.
16	Explore the possibility of increasing the number of air monitors in the county.
17	Incorporate climate adaption policies into the Kilkenny City & County Development Plan 2020-2026.
18	Explore the opportunities within County Kilkenny to create, improve and enhance ecosystems through nature based solutions.
19	Build expertise, capacity and increase the knowledge base through relevant training programmes on Climate Change and its implications on the operations/functions of Kilkenny County Council. Training courses/ modules/programmes may include: -Climate Change awareness training to staff, elected members and communities -Invasive species awareness and management training -Relevant safety training -Service delivery training for outdoor staff in flood situations.
20	Collaborate with the National Biodiversity Data Centre in collating biodiversity and invasive species data in Kilkenny to inform future policy decisions.
21	Review tree and hedgerow protection policies in the review of the City & County Development Plan to ensure they support the CCAS and are adequately implemented and enforced.
22	Review relevant wetland policies in the review of the City & County Development Plan to ensure they support the CCAS and are adequately implemented and enforced.
23	In accordance with the objective in the Climate Action Plan 2019, to establish a number of pilot 'climate action community engagement' offices in a number of Local Authorities, Kilkenny County Council will proactively seek to become one of these pilot office to further develop our community engagement role.