

2019

Minogue and Associates

**SEA SCREENING REPORT ON
CHIEF EXECUTIVES
RECOMMENDATIONS SOUTH
DUBLIN CLIMATE CHANGE
ACTION PLAN 2019-2023**

Prepared under S.I 435 of 2011.

Contents

1.1 Introduction	2
1.2 Public Consultation	2
1.3 Chief Executive’s Report	3
1.4 Purpose of this SEA Screening Report	3
2 Assessment of CE Recommendations for Actions in the South Dublin CCAP	5
2.1 Introduction	5
3 Assessment of Chief Executive Recommendations relating to Actions in the South Dublin CCAP. 7	
3 Schedule 1 Assessment	25
3.1 Introduction	25
3.2 Strategic Environmental Assessment Determination	27

1.1 Introduction

For the first time, Dublin's four local authorities have joined together to develop Climate Change Action Plans as a collaborative response to the impact that climate change is having, and will continue to have, on the Dublin Region and its citizens. While each plan is unique to its functional area, they are unified in their approach to climate change adaptation and mitigation, and their commitment to lead by example in tackling this global issue.

These CCAPs follow on from the publication of A Strategy for Climate Change Action Plans for the Dublin Local Authorities (DLAs), which was published in January 2017. The strategy used a structured approach that focused on seven key areas (Citizen Engagement, Planning, Energy, Transport, Water, Waste, and Ecosystems & Biodiversity), and set out how the DLAs would develop the four climate change action plans. The action plans will be unique to each local authority area but synchronised in their methodology.

The actions in the CCAP are presented around a number of themes as follows:

- Energy and Buildings
- Transport
- Flood Resilience
- Nature Based Solutions
- Resource Management.

Collectively, these collectively address the four targets of this plan, which are:

- A 33% improvement in the Council's energy efficiency by 2020
- A 40% reduction in the Council's greenhouse gas emissions by 2030
- To make Dublin a climate resilient region, by reducing the impacts of future climate change - related events
- To actively engage and inform citizens on climate change.

As such, the CCAP encompasses the functional and administrative area of South Dublin.

1.2 Public Consultation

Public consultation on the Draft Climate Change Action Plan took place over a six-week period from Monday 11th February to Monday 25th March 2019, with 234 valid submissions received in total.

In addition, and in accordance with the Planning and Development (Strategic Environmental Assessment) Regulations 2004 to 2011, as amended, and Habitats Directive 92/43/EEC, a Strategic Environmental Assessment (SEA) Environmental Report and an Appropriate Assessment Natura Impact Statement, were also on public display.

0.1 Details of the Public Consultation Process

The objectives of the Draft Climate Change Action Plan public consultation process were as follows:

- Increase awareness of the Draft Climate Change Action Plan for the general public, various stakeholders, prescribed bodies, and Council staff;
- Provide opportunities for more creative and dynamic engagement with a variety of interested parties, including younger citizens, older citizens and locally based community and resident's groups;
- Increase the number, variety and quality of submissions received, appropriate to the Draft Climate Change Action Plan;
- Encourage longer term engagement strategies beyond the Draft Climate Change Action Plan stage and scope follow up activities; and
- To align with the Council's internal and external communication objectives.

The Council has used a variety of online and supporting ‘face to face’ methods, to consult and engage with the citizens of South Dublin Council area and a range of other stakeholders and interested parties.

- Codema developed a generic information leaflet (2,000 copies printed) and event programmes (500 copies printed each) for the #Councils4ClimateAction events. This material helped to provide information on the Plans and to promote what was taking place at each of the events. These leaflets were widely available online to help spread the word and cut down on the need for printed copies.
- The *#Councils4ClimateAction* social media campaign was particularly effective throughout the public consultation process and for promoting the Councils’ events.
- Codema acted as the central liaison point between all four Councils’ Communications Teams and together a central message was formed around the plans and the ‘make a submission’ call to action.
- Press releases were issued by the four DLAs and Codema in the run up to the public consultation period opening and the public events, resulting in widespread national and local media coverage such as the Irish Times, RTE Television Six-One and Nine O’Clock News Bulletins, Virgin Media One News Bulletins, RTE Radio 1 and Newstalk 106-108fm.

1.3 Chief Executive’s Report

A Chief Executive’s (CE) Report has been prepared which summarises, details the outcome of the public consultation programme on the Draft Climate Change Action Plan, and contains the following:

All submissions were read, analysed and summarised. A list of the persons, organisations and bodies that made submissions is provided in Appendix A of the CE Report. The categorisations and summary of issues raised, together with the Chief Executive’s response and recommendations is contained in Section 0.5 onwards. **NB:** The headings relating to the categorisation and summary of issues raised, together with the Chief Executive’s response and recommendations, follows that of the headings of the Draft Climate Change Action Plan document i.e. Section 0.5.1 Executive Summary, Section 0.5.2 Introduction, and so forth.

1.4 Purpose of this SEA Screening Report

The purpose of this SEA Screening report and accompanying Determination is to evaluate the requirement for SEA to be undertaken on the Recommendations by the Chief Executive. This Determination should be read in conjunction with the Chief Executive report and all other associated documents including the:

- CE report;
- SEA Environmental Report for the draft South Dublin CCAP;
- Appropriate Assessment (AA) Screening Report and Natura Impact Statement for the draft South Dublin CCAP.
- AA Screening Report for the Chief Executive’s Recommendations.

In deciding whether CE recommendations are likely to have significant environmental effects, regard must be had to the criteria set out in Annex II of the SEA Directive. The approach to this screening assessment is to assess each material alteration for potential environmental effects.

As the draft CCAP was subject to full SEA and is accompanied by an Environmental Report, the assessment will be undertaken within the context of the ER and in particular against the Strategic Environmental Objectives of the SEA ER.

Section Two of this report assesses the CE recommendations for identified Actions of the CCAP against the criteria contained in Schedule 1 of the Planning and Development (Strategic Environmental Assessment) Regulations SI 435 of 2004.

2 Assessment of CE Recommendations for Actions in the South Dublin CCAP

2.1 Introduction

The section examines whether each CE recommendation relating to an action would be likely to have significant environmental effects and would thereby trigger the need for SEA on same. In undertaking this SEA Screening, the relevant criteria set out in Schedule 2a of the SEA Regulations forms the basis of this assessment.

The focus of this SEA Screening is only on the CE Actions as other changes to the CCAP arising from the consultation period relate to additional text, context, consistency with other adaptation plans and do not significantly change the nature and character of the CCAP.

This section therefore assesses each of the CE Recommendations on Actions on an individual basis and then provides for an assessment of in-combination effects.







Submissions received by statutory bodies on the SEA ER are presented in Annex 1 and will be used to update the SEA ER.

Where additional text is proposed as part of the CE recommendation it is shown in **green** font. Where text is deleted this is shown in strikethrough.

Table 1 below shows the Strategic Environmental Objectives used in the South Dublin SEA Environmental Report. These are used in Section Three Assessment of CE Recommended Actions.

TABLE 1 STRATEGIC ENVIRONMENTAL OBJECTIVES

SEA Topic	Strategic Environmental Objectives
Biodiversity Flora and Fauna	To avoid loss of habitats, geological features, species or their sustaining resources in designated ecological sites
	To avoid significant adverse impacts, including direct, cumulative and indirect impacts, to habitats, geological features, species or their sustaining resources in designated ecological sites by development within or adjacent to these sites
	To sustain, enhance or - where relevant - prevent the loss of ecological networks or parts thereof which provide significant connectivity between areas of local biodiversity
Population and human health	To protect human health from hazards or nuisances arising from traffic and incompatible landuses.
	
Water	To maintain and improve, where possible, the quality of rivers, lakes and surface water.
	To prevent pollution and contamination of ground water
	To prevent development on lands which pose - or are likely to pose in the

	future – a significant flood risk
Air Quality and Climate	To minimise increases in travel related greenhouse emissions to air
	To reduce car dependency within the County by way of, inter alia, encouraging modal change from car to more sustainable forms of public transport and encouraging development which will not be dependent on private transport
Soil and Geology	To maximise the sustainable re-use of brownfield lands and the existing built environment, rather than developing greenfield lands
	To minimise waste production and reduce the volume of waste to landfill and to operate sustainable waste management practices
Material Assets	To maintain and improve the quality of drinking water supplies
	To serve new development under the CDP with appropriate waste water treatment
	To minimise waste production and reduce the volume of waste to landfill and to operate sustainable waste management practices.
Cultural Heritage	To protect the archaeological heritage of South Dublin with regard to entries to the Record of Monuments and Places - including Zones of Archaeological Potential - and the context of the above within the surrounding landscape where relevant
	To preserve and protect the special interest and character of South Dublin's architectural heritage with regard to entries to the Record of Protected Structures, Architectural Conservation Areas, and their context within the surrounding landscape where relevant
Landscape	To protect and avoid significant adverse impacts on the landscape, landscape features and designated scenic routes; especially with regard to areas of high amenity, the Dublin Mountain Area, and the Liffey and Dodder Valleys.
	
	Interrelationships <i>Maintain and improve the health of people, ecosystems and natural processes</i> <i>Actively seek to integrate opportunities for environmental enhancement during adaptation to climate change</i>

3 Assessment of Chief Executive Recommendations relating to Actions in the South Dublin CCAP.

This section assesses the Actions recommended in the CE report for the South Dublin CCAP. In line with the approach to the SEA the actions are assessed across the parameters listed in Section 2. The matrix and symbols used are provided below in Tables 1 and 2 respectively.

TABLE 2 MATRIX OF ASSESSMENT

No likely interaction with /insignificant impact with SEOs	0	Potential conflict with SEOs – likely to be mitigated	↕
Likely to improve status of SEOs	↑	Probable conflict with SEOs – unlikely to be mitigated	↓

TABLE 3 SYMBOLS USED IN THIS SEA














































SEA Topic										
Biodiversity Flora and Fauna	Population and human health Noise	Water Resources including flood	Soil and Geology	Material Assets	Air Quality and Climatic Factors	Cultural Heritage	Landscape	Interrelation ship		
										

TABLE 4 ASSESSMENT OF CE RECOMMENDED ACTIONS

No.										
	<p>The City Council Energy Review (mid 2019) and going forward, will include a glide path illustrating the energy efficiency and GHG emission targets for the City Council up to and including 2030.</p> <p>Appendix II: Total Emissions in South Dublin of the CCAP, will also be updated every two years in accordance with EU Covenant of Mayors for Climate & Energy protocol.</p>	0	0	0	0	0	0	0	0	0
<p>SEA Comment</p> <p>SEA comment:</p>										










No.										
<p>These two actions as recommend will provide information on the energy efficiency and targets through diagrams (glide path) as well as biannual updates of total emissions. These in and of themselves do not give rise to landuse effects. No interaction with Strategic Environmental Objectives and no significant environmental effects are identified for this CE recommendation.</p>										
	<p>The Architects Department of South Dublin County Council is committed to participating with the RIAI in particular the Sustainability Task Force in seeking new and innovative approaches to Climate action in the built environment</p> <p>Identify site for trialling renewable energy projects, including solar PV and Geothermal.</p> <p>The Council will investigate the</p>	0	↑	0	0	↑	↑	↑	↑	↑










No.							 <small>Climate change</small>			
	<p>Lifecycle Assessment of Traditional and New Construction Methods for Residential Projects in Dublin.</p> <p>In all building projects, new build or retrofit, Swift Bricks or other nesting sites for swifts will be provided where practicable. The presence of swift breeding sites will be identified to ensure that known breeding sites are not lost as a result of construction work.</p> <p>Develop maintenance and condition survey programmes for</p>									










No.							 <small>Climate change</small>			
	<p>Council owned historic and ancient monuments that are informed by climate change impacts.</p> <p>Conduct research and seek to develop Council based case studies on appropriate and sensitive retro-fitting/energy upgrading of traditional buildings to inform works both to Council owned properties and to guide private owners.</p>									










Strategic Environmental Assessment of Chief Executive's Recommendation










Actions relating to long term building renovation and new and innovative climate action in the built environment are consistent with a number of SEOs in particular, material assets, climate change and air quality, population and human health as well as indirect positive effects in relation to cultural heritage and landscape. The above actions focus on cultural heritage in particular. By promoting consideration of these resources and adapting and considering climate change effects stronger protection of these resources are integrated to the South Dublin CCAP. These are identified as generating positive direct interactions with a number of SEOs including Cultural Heritage, Landscape and Climate Change as well as indirect positive effects on population and human health and material assets SEOs. No adverse environmental effects










No.										
<p>are identified for these CE recommended actions.</p> <p>The identification of new sites for trailing renewable energy project such as geothermal should utilise the GIS data in particular. Existing measures in the South Dublin CDP, the CCAP, SEA ER and NIS will also apply. Subject to full implementation as appropriate, no adverse environmental effects are identified.</p> <p>The action relating to Swift Boxes is included on foot of a submission by Birdwatch Ireland. Positive effects in particular in relation to Biodiversity SEOS and no significant environmental effects are identified for this CE recommendation.</p>										
	Expand availability of EV charging points and other facilities for non fossil fuelled powered vehicles in the County	O	↑	O	O	↑	↑	O	O	↑
<p>SEA Comment</p> <p>This action relates to minor landuse effect. No significant environmental effects are identified for this CE recommendation and expansion of non fossil fuel vehicles availability is consistent with SEOs around material assets, climate change and human health.</p>										
	Strengthen traditional villages by improving the public realm through enhancement of	↕		↕	↕	↑	↑			↑










No.										
	green infrastructure measures and sustainable transport linkages									
This action was assessed during draft plan and was recommended for mitigation to enhance environmental performance.										
	SDCC participates in the national Cycle Right programme bringing cycle training to pupils in primary and secondary schools throughout the city area. SDCC works closely with An Taisce Green Schools on the Green Travel theme and encourages increased cycling through support for cycle training, on site cycle parking and improvements to the	O	↑	O	O	↑	↑	O	O	↑

No.							 <small>Climate change</small>			
	<p>physical environment identified by pupils.</p> <p>Cycle Training Programme for 6th Class students / Pedal Power Labs</p> <p>SDCC will continue to seek new and expand on existing partnerships to encourage sustainable travel and safer travel behaviours.</p> <p>SDCC will establish a portal dedicated to communication and promotion of active travel within existing platforms</p>									
SEA Comment										

No.										
<p>These new actions provides for positive interactions with a range of SEOS namely climate change, air quality, material assets, population and human health. Subject to the implementation of relevant measures in the South Dublin CDP, CCAP, SEA ER and NIS no adverse environmental effects are identified.</p>										
<p>SEA Comment</p> <p>Actions relating to air quality monitoring are positive particularly as they can be used to provide a baseline and monitoring regime for air quality trends. This is consistent with a number of SEOS including population and human health, climate change and material assets. Indirect longer positive effect should the monitoring result in actions that improve air quality with accompanying benefits for biodiversity, human health, water and climatic factors.</p>										
	<p>SDCC will engage with local communities to develop a vision for the future of their neighbourhoods with a strong focus on local living, sustainable mobility and quality of life</p>	↑	↑	↑	↑	↑	↑	↑	↑	↑
<p>The above action supports engagement communication and collaboration and this is consistent with a number of SEOS including population and human health, climate change and material assets.</p>										

No.										
	The Council will undertake an assessment of the number of existing and potential future Electric Vehicle Charge points in its jurisdiction.									
<p>Comment:</p> <p>This action will relate to an assessment only and does not at this juncture give rise to landuse effects. No interaction with Strategic Environmental Objectives currently and no significant environmental effects are identified for this CE recommendation.</p>										
	<p>Develop template to capture impacts, response and costs (including ecosystem services/natural capital costs) for all major climate events</p> <p>Update DLA urban drainage and flooding policies for current knowledge of flood risk</p>									

No.							 <small>Climate change</small>			
	<p>and the latest best practice in drainage design promoting natural flood measures as a priority</p> <p>Minor flood schemes and general maintenance that are designed and implemented to promote nature based solutions where practical</p> <p>Communication and awareness campaigns on flood risk management and natural flood management measures</p> <p>Include native species into local authority plans where appropriate as a key nature based</p>									

No.							 <small>Climate change</small>			
	measure where appropriate									
SEA Comment: The above actions were assessed during draft plan preparation and were recommended for mitigation to enhance environmental performance										
	<p>Promote programmes to advise businesses on reducing waste e.g. Eco-Merit</p> <p>Promote recycling and the circular economy to householders through a range of workshops, talks and programmes</p> <p>Explore collaboration with stakeholders such as Refill.ie to reduce single use items.</p>	O	↑	O	O	↑	↑	O	O	↑
SEA Comment: Promotion of circular economy is consistent with SEOS particularly around material assets and climate change. Actions that address illegal dumping and										










No.									
promote behavioral change in relation to litter generate positive effects as a reduction in illegal dumping creates long term positive effects on soil and geology, water and biodiversity, as well as Landscape and Population									
The Local Authority will work with the Local Authority Waters Programme in its support of communities and stakeholders in the delivery of local water quality projects and initiatives	↑	↑	↑	↑	↑	↑	↑	↑	↑
SEA comment: positive interactions with all SEOs									

TABLE 5 IN COMBINATION EFFECTS

Plan	Comment	Cumulative effects
Climate Change Action Plans 2019-2024 for other Dublin Local Authorities	During the formulation of the CCAPs for the Dublin Region, a suite of common thematic actions have been prepared for each of the local authority areas The individual action plan for each Local Authority has undergone Habitats Directive Assessment and Strategic Environmental Assessment. It has been	Adverse cumulative effects not identified

	found that by implementing the mitigation policies and objectives of the relevant CDP as identified in the NIR and SEA ER, effects to the environment and European Sites are not likely to occur	
National Planning Framework	The purpose of the NPF is to provide a focal point for spatial plans throughout the planning hierarchy. It will provide a framework for the new Regional Spatial and Economic Strategies (RSESs) by the three Regional Assemblies and the associated enhancement of the economic development focus of local authorities as per the Local Government Reform Act 2014. The NPF will co-ordinate the strategic planning of urban and rural areas in a regional development context to secure overall proper planning and development as well as co-ordination of the RSES's and city/ county development plans in addition to local economic and community plans and local area plans and other local development.	The SEA And NIR of the NPF and Draft RSES are now available.
Regional Spatial & Economic Strategy (Draft)	<p>The RSES is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level it provides a framework for investment to better manage spatial planning and economic development throughout the Region. The Eastern and Midland Regional Assembly have proposed material amendments to the draft Regional Spatial and Economic Strategy for the period 2019-2031, as required under section 24 (8) of the Planning and Development Acts 2000-2018.</p> <p>The Environmental Report has been updated in accordance with the SEA Directive and the Planning and Development (Strategic Environmental Assessment) Regulations S.I. No. 436/2004 (as amended), accompanied by a Regional Flood Risk Appraisal Report. A Natura Impact Report (to inform the Appropriate Assessment) has also been updated in accordance with Article 6 of the Habitats Directive, the Planning and Development Act 2000-2018, and the European Communities (Birds and Natural Habitats) Regulations S.I. No. 477/2001 (as amended).</p> <p>These documents were on display until 12th April 2019 and the report on</p>	The SEA ER and NIS of the draft RSES and material amendments SEA were reviewed. At this juncture, no adverse in combination effects are identified

	consultations and Material amendments will be considered when available.	
Water Services Strategic Plan	Ireland's first integrated national plan for the delivery of water services, the Water Services Strategic Plan (WSSP) addresses six key themes and was adopted in 2015. It was subject to full SEA and AA and concluded that Overall, the assessment has identified that the implementation of the draft WSSP is likely to have positive effects on the majority of the SEOs that have been used in the assessment to help characterise the environmental effects of the WSSP and no significant negative effects were identified.	No in-combination impacts were predicted as a result of implementation of the Plans
Neighbouring County Development Plans	These plans were subject to full SEA and AA and concluded that subject to full adherence and implementation of measures likely significant effects were not identified.	No in-combination impacts were predicted as a result of implementation of the Plans
River Basin District Management Plans.	The National River Basin District Management Plan is now published (2018). The second cycle River Basin Management Plan aims to build on the progress made during the first cycle with a greater emphasis on ensuring the evidence base is available and the administration supports are fully in place to support key measures. The approach to the plan development involves characterisation of Ireland's water bodies in order to develop a tailored programme of measures to allow for the protection of good status or the restoration of good status for all water bodies. The outcomes are then monitored in order to feed into further characterisation and measures setting as the cycle moves forward. The plan was subject to SEA and Appropriate Assessment.	No in-combination impacts are predicted as a result of implementation of the Plans
CFRAMS Study	The Eastern CFRAM study has been commissioned in order to meet the requirements of the Floods Directive, as well as to deliver on core components of the 2004 National Flood Policy, in the Eastern district.	No in-combination impacts are predicted as a result of implementation of the Plans.

**Greater Dublin
Drainage**

Irish Water made a planning application for strategic infrastructure development to An Bord Pleanála for the Greater Dublin Drainage Project in June 2018. The GDD project proposes a new regional wastewater treatment facility to be located in the townland of Clonshaugh in north county Dublin, an underground orbital sewer from Blanchardstown to Clonshaugh, a new pumping station at Abbotsown, a partial diversion of the north fringe sewer, and an outfall pipeline to return the treated water to the Irish Sea. The project also includes a regional sludge treatment centre at the new GDD facility and an associated biosolids storage facility at Newtown near Kilshane Cross.

Chapter 23 of the EIAR was reviewed with a focus on the cumulative impacts, No in-combination impacts are predicted as a result of implementation of the Project

The Greater Dublin Transport Strategy 2016-2035	<p>The Transport Strategy for the Greater Dublin Area, 2016-2035 has been prepared and published by the National Transport Authority. It sets out how transport will be developed across the region, covering Dublin, Meath, Wicklow and Kildare, over the period of the strategy and has been approved by the Minister for Transport, Tourism and Sport in accordance with the relevant legislation.</p> <p>Luas, heavy rail and orbital bus routes are of particular relevance to the elements of this Strategy and the CCAP.</p>	<p>Positive effects in relation to the prioritisation of public transport modes above private transport.</p>
--	---	--

It is noted that a series of sectoral adaptation plans are due to be submitted to government by end of September 2019. Reference is made to same and a commitment to consistency is provided in the CE Report National Context as follows:

“Under the National Adaptation Framework, sectoral adaptation plans are required to be prepared and submitted to the Government for approval, by 30th September 2019. Adaptation plans will be prepared for the following sectors:

- *Seafood - Department of Agriculture, Food and the Marine*
- *Agriculture - Department of Agriculture, Food and the Marine*
- *Forestry - Department of Agriculture, Food and the Marine*
- *Biodiversity - Department of Culture, Heritage and the Gaeltacht*
- *Built and Archaeological Heritage - Department of Culture, Heritage and the Gaeltacht*

- *Transport infrastructure - Department of Transport, Tourism and Sport*
- *Electricity and Gas Networks - Department of Communications, Climate Action and Environment*
- *Communications networks - Department of Communications, Climate Action and Environment*
- *Flood Risk Management - Office of Public Works*
- *Water Quality - Department of Housing, Planning and Local Government*
- *Water Services Infrastructure - Department of Housing, Planning and Local Government*
- *Health - Department of Health*

The implementation and future iterations of the Climate Change Action Plan will be consistent with approved sectoral adaptation plans and the Council will work in partnership with sectors to achieve and deliver the sectoral plans.”

3 Schedule 1 Assessment

3.1 Introduction

This section presents a screening in line with Schedule 1 of the SEA Regulations(S.I 435 of 2004) as amended. It concludes with a SEA Screening Conclusion.

Table 6 SEA Screening against Schedule 1

Criteria for determining whether the Plan is likely to have significant effects on the environment
<p>1. The characteristics of the plan having regard, in particular, to:</p>
<p><i>the degree to which the Plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,</i></p>
<p>The plan does establish a range of actions, some of which are more landuse based, than others. The plan will provide a framework to help achieve climate change resilience at SDCC level but also as part of a wider Dublin regional co-ordinated effort.</p> <p>The CE recommended actions are in compliance with the Strategic Environmental Objectives as Section Two of this report demonstrate.</p>
<p><i>the degree to which the Plan influence other plans, including those in a hierarchy,</i></p>
<p>The CE recommendations as they relate to actions will be underpinned by the statutory planning framework hierarchy in particular the National Planning Framework, Eastern and Midlands Regional Economic and Spatial Strategy , South Dublin CDP 2016-2022.</p>
<p><i>the relevance of the Plan in the integration of environmental considerations in particular with a view to promoting sustainable development,</i></p>
<p>The CE recommendations as they relate to actions overall strengthen environmental protection particularly in relation to cultural heritage and circular economy.</p> <p>By inserting all SEA and AA mitigation measures identified on the draft Plan further commitments to environmental enhancement are provided.</p>
<p><i>Environmental problems relevant to the Planning Scheme</i></p>
<p>The assessment in Section 2. has shown that conflicts with SEOS are not identified; and where they are, existing mitigation measures included in the CCAP SEA ER, Natura Impact Statement and South Dublin CDP 2016-2022 will provide sufficient environmental protection.</p> <p>The draft CCAP has been prepared through careful consideration of key environmental issues and the CE Recommendations as they relate to actions do not dilute or significantly affect these environmental considerations.</p>
<p><i>the relevance of the Plan to the implementation of European Union legislation on the environment (e.g. plans linked to waste-management or water protection).</i></p>
<p>The SEA , and other environmental assessments including Appropriate Assessment considered and integrated European Union legislation on the environment including those relating to topics such as</p>

Waste Management and Water protection.

Given the severe challenges facing Ireland in responding to climate change, the CCAP is very relevant in setting out actions, targets and indicators that can be measured to see how at local authority level, measures are being implemented to respond to this urgent issue.

The assessment of the CE actions has not identified conflicts with such provisions and no significant effects on the environment are identified.

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

the probability, duration, frequency and reversibility of the effects,

The Proposed CE Recommendations would not be likely to result in significant environmental effects as detailed in the individual assessment of actions in Section 2 and in combination assessment in Section 2.

the cumulative nature of the effects,

The CE recommendations as they relate to actions would not be likely to result in significant environmental effects as detailed in the individual assessment of the actions in Section 2 and in combination assessment in Section 2

the transboundary nature of the effects

The CE Recommendations as they relate to actions would not be likely to result in significant environmental effects as detailed in the individual assessment of actions in Section 2 and in combination assessment in Section 2

the risks to human health or the environment (e.g. due to accidents),

The CE Recommendations would not be likely to result in significant environmental effects as detailed in the individual assessment of the actions in Section 2 and in combination assessment in Section 2.

the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).

The CE Recommendations as they relate to actions would not be likely to result in significant environmental effects as detailed in the individual assessment of material alterations in Section 2 and in combination assessment in Section 2.

the value and vulnerability of the area likely to be affected due to:

(a) special natural characteristics or cultural heritage

The sphere of influence of the CCAP includes a number of European Sites as well as numerous important cultural heritage sites and landscapes. The new actions proposed by the CE as they relate to cultural heritage are particularly significant as they relate to adapting and considering climate change on cultural heritage.

Existing measures in the CCAP, SEA ER and Natura Impact statement, subject to their full

implementation are not identified as giving rise to significant effects on European Sites within the plans' sphere of influence.

(b) exceeded environmental quality standards or limit values,

It is anticipated that environmental quality standards will not be exceeded by the CCAP actions.

(c) intensive land-use,

No significant environmental effects are identified for the CE recommendations as they relate to actions.

(d) the effects on areas or landscapes which have a recognised national, European Union or international protection status.

A Habitats Directive Screening Statement has been prepared in tandem with this SEA Screening to assess if likely significant effects arise in relation to conservation management objectives of European Sites and the CE Recommendations as they relate to actions. This has found that no such effects are identified. .

3.2 Strategic Environmental Assessment Determination

A Strategic Environmental Assessment (SEA) Screening determination has been made by South Dublin County Council regarding actions as recommended by the Chief Executive Report on submissions made on the Draft South Dublin CCAP 2019-2012.

Section 9 (1) of the (2004) Regulations (S.I. No. 435) (as amended) states "*subject to sub-article (2), an environmental assessment shall be carried out for all plans and programmes*

(a) which are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications and tourism, and which set the framework for future development consent of projects listed in Annexes I and II to the Environmental Impact Assessment Directive, or

(b) which are not directly connected with or necessary to the management of a European site but, either individually or in combination with other plans, are likely to have a significant effect on any such site."

As the screening assessment under Schedule 1 above demonstrates, the scale, size and location of the CE Recommendations as they relate to actions to the CCAP on foot of public submissions is not identified as giving rise to adverse effects on the environment.

This is due to the nature of the new actions which overall are positive for a number of Strategic Environmental Objectives including Climate Change, Population and Human Health, Material Assets, cultural heritage and landscape. The existing measures included in the SEA ER, Natura Impact Statement of the South Dublin CCAP 2019-2023 are identified as sufficiently robust and subject to their full implementation, no likely significant effects on the environment are identified.

This assessment is further supported by the Screening Statement in support of Appropriate Assessment.