WESTERN CATCHMENT FLOOD RISK ASSESSMENT AND MANAGEMENT STUDY – UoM30 CORRIB RIVER BASIN STRATEGIC ENVIRONMENTAL ASSESSMENT & NATURA IMPACT ASSESSMENT REVIEW

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An Roinn Caiteachais Phoiblí
agus Athchóirithe
Department of Public
Expenditure and Reform

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WESTERN CATCHMENT FLOOD RISK ASSESSMENT AND MANAGEMENT STUDY – UoM30 CORRIB RIVER BASIN STRATEGIC ENVIRONMENTAL ASSESSMENT & NATURA IMPACT ASSESSMENT REVIEW

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Keywords: *Review of Flood Risk Management Plan; Environmental Reports; Strategic Environmental Assessment Statement and; Natura Impact Statement*

Abstract: Fehily Timoney & Company carries out a review of the Environmental Reports, Strategic Environmental Assessment Statement and Natura Impact Statement to assist the Minister to conclude whether the FRMP will adversely affect the integrity of a Natura Site/Sites and if significant effects on the environment are likely to occur.

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1 INTRODUCTION

This document has been prepared by Fehily Timoney & Company on behalf of the Department of Public Expenditure and Reform to review the SEA and AA reports for the Corrib River Basin Flood Risk Management Plan (UoM30) as part of the Western CFRAM study, such that the Department of Public Expenditure and Reform may be in a position to recommend to the Minister on the adequacy/compliance, or otherwise, of the SEA and AA submitted by the OPW for approval. The approval process will provide for a separate and independent review of the plans undertaken to inform the Minister as to the adequacy/compliance, or otherwise, of the plans.

In considering the Corrib River Basin Strategic Environmental Assessment and Appropriate Assessment the following documents were reviewed;

Draft Flood Risk Management Plan

Strategic Environmental Assessment - Environmental Report

Strategic Environmental Assessment - Environmental Report Addendum

Strategic Environmental Assessment - Statement

Natura Impact Statement

In assessing these documents a report was produced to determine if the procedures and statutory obligations set out in the relevant environmental regulations have been fully complied with; if all relevant environmental considerations have been duly and effectively assessed; if the FRMP will adversely affect the integrity of a Natura Site/Sites and if significant effects on the environment are likely to occur.

This document is presented in a number of checklists having regard to the EPA guidelines as derived from the SEA Directive (2001/42/EC), the EU Habitats Directive (92/43/EEC) and the Birds Directive as amended (2009/147/EC).

Table 1: AA SCREENING

AA Screening				
Minimum Requirements				
	Question	**Yes**	**No**	**Comment**
1.1	Is the statutory basis for AA set out?	Yes		Detailed in section B.1.1
1.2	Is methodology in line with DEHLG (2009); EC (2001 and 2002)?	Yes		Detailed in section B.1.2
1.3.1	Is there a desk based assessment?	Yes		Detailed throughout screening process.
1.3.2	Is there a field-based assessment?		No	Not detailed in report.
1.4	Does the project description adequately describe the project?	Yes		Section B.2 adequately describes the project.
1.5	Is there a clear figure of the site location and proposed plan?	Yes		Figure B-14-3, B-14-4 and B-14-5.
1.6	Has consultation with NPWS / DAU taken place?	Yes		Section B.11 states that consultation took place.
1.7	Have all European Sites been considered within 15km of the project?	Yes		Listed in Table B-14-3.
1.8	Are there any European Sites at a greater distance than 15km ecologically connected to the project?	Yes		Section B.4 sets out a 35km zone beyond the study area in relation to sites containing Fresh Pearl Mussels, Margaritffera, Margaritifera Durrovensis and Groundwater Dependent Terrestrial Ecosystems that are hydrologically connected to the study area.
1.9	Are figures included illustrating the project in relation to European Sites?	Yes		Illustrated in figure 14-6.
1.10	Is there a clear identification of which European Sites are being considered in the assessment?	Yes		Listed in table B-14-4.

AA Screening				
Minimum Requirements				
	Question	**Yes**	**No**	**Comment**
1.11	Is the screening of each European Site (out/in) adequately described?	Yes		Section B.5 describes the screening process.
1.12	Are the conservation objectives for the relevant European Sites set out?	Yes		Conservation objectives are included in appendix B, however, conservation objectives for screened out sites are not detailed.
1.13	Has the following screening matrix been fulfilled in text or table format?			
1.13.1	*Is there a brief description of project or plan?*	Yes		Described in section B.2.5
1.13.2	*Is there a brief description of the Natura 2000 (European) Site(s)?*	Yes		Detailed in Appendix B.
1.13.3	*Is there a description of any likely direct, indirect or secondary impacts of the project (either alone or in combination with other plans or projects) on the Natura 2000 site by virtue of?*		No	Impacts listed in the screening process do not relate to specific Natura 2000 sites. General potential impacts are listed in Table B-14-1 and cumulative impacts are discussed in relation to other plans and policies in Table B-14-5.
	• Size and scale;			
	• Land-take;			
	• Distance from Natura 2000 site or key features of the site;			
	• Resource requirements;			
	• Emissions;			
	• Excavation requirements;			
	• Transportation requirements;			
	• Duration of construction, operation etc.;			
	• Other.			

AA Screening				
Minimum Requirements				
	Question	**Yes**	**No**	**Comment**
1.13.4	*Is there a description of the likely changes to the site arising as a result of?*		No	The AA screening does not discuss likely impacts in relation to specific Natura 2000 sites.
	• Reduction of habitat area;			
	• Disturbance of key species;			
	• Habitat or species fragmentation;			
	• Reduction in species density;			
	• Changes in key indicators of conservation value;			
	• Climate change.			
1.13.5	*Is there a description of any likely impacts on the Natura 2000 site as a whole in terms of?*	Yes		Table B-14-1. Impacts are not discussed in relation to specific Natura 2000 sites but in relation to all sites.
	• Interference with the key relationships that define the structure of the site;			
	• Interference with key relationships that define the function of the site.			
1.13.6	*Are indicators of significance provided as a result of the identification of effects set out above in terms of:*		No	Indicators of significance are not set out in AA screening.
	• loss,			
	• fragmentation,			
	• disruption,			
	• disturbance,			
	• change to key elements of the site (e.g. water quality etc.).			

AA Screening				
Minimum Requirements				
	Question	**Yes**	**No**	**Comment**
1.13.7	*Is there a description from the above, those elements of the project or plan, or combination of elements, where the above impacts are likely to be significant or where the scale of magnitude of impacts is not known?*	Yes		Table B-14-1 sets out the significance of impacts but detail lacks depth at screening stage with regard to impacts on specific Natura 2000 sites.
1.14	Have other plans or projects in the vicinity been identified?	Yes		Table B-14-5 sets out relevant plans and policies.
1.15	Have cumulative effects been assessed?	Yes		Section B.5.3 sets out cumulative impacts.
1.16	Has a FONSE Matrix been completed for screened out European Sites, including the following:		No	A formal matrix has not been created for each screened out site, however, the assessment continues to Stage 2.
1.16.1	*Name and location of the Natura 2000 sites*			
1.16.2	*Description of the project or plan*			
1.16.3	*Is the Project or Plan directly connected with or necessary to the management of the site (provide details)?*			
1.16.4	*Are there other projects or plans that together with the project or plan being assessed could affect the site (provide details)?*			
1.16.5	*Describe how the project or plan (alone or in combination) is likely to affect the Natura 2000 site*			
1.16.6	*Explain why these effects are not considered significant*			
1.16.7	*Who carried out the assessment*			
1.16.8	*Sources of Data*			
1.17	Are the reasons for proceeding to Stage 2 clearly explained?	Yes		Clearly stated in section B.6.

Table 2: NATURA IMPACT STATEMENT

Natura Impact Statement				
Minimum Requirements				
	Question	**Yes**	**No**	**Comment**
2.1	Does the plan description adequately describe the plan?	Yes		Set out in section B.2 and B.7.
2.2	Are the conservation objectives detailed?	Yes		Appendix B details conservation objectives for Natura 2000 sites.
2.3	Is there an adequate description of how the project will affect key species and key habitats?	Yes		Set out in section B.7.1. However, information is non-specific to individual Natura 2000 sites.
2.4	Are there any uncertainties or gaps in information?	Yes		Due to the strategic nature of the plan, detailed works are not set out. Section B.10 states, in relation to structural works, "the design of these works has not been finalised and may change before being implemented." Section B.7.2 states that "The implementation of AFA works will require further assessment at a project level, at which stage more detailed mitigation measures can be designated as appropriate," Therefore, detailed impacts on Natura 2000 sites cannot be effectively established at this level, requiring further evaluation at project level.
2.5	Is the effect of the project on the integrity of the European Sites adequately assessed (determined by structure and function and conservation objectives) *check desktop data to ensure all elements have been addressed?		No	Section B.7.2 discusses the potential significant effects on proposed measures for AFA flood relief works within Galway City and Salthill. Further detail of impacts to Natura 2000 sites throughout the UoM are lacking due to the strategic nature of this plan.
2.6	Are mitigation measures described to avoid, reduce or remedy effects?	Yes		Section B.9 sets out mitigation measures.
2.7	For each mitigation measure are the following details given:		No	Mitigation measures are non-specific as this plan is strategic in nature. Section B.9.2 states: "This WFD assessment will inform the project level AA regarding likely significant effects and adverse impacts on the site integrity of Natura 2000 sites in respect of their conservation objectives and if necessary, appropriate mitigation measures will be implemented at project level to ensure adverse effects will not occur."

Natura Impact Statement				
Minimum Requirements				
	Question	**Yes**	**No**	**Comment**
				Section B.9.1 states that a consenting process for physical works will require the applicable environmental assessments. Therefore, mitigation set out at strategic level is indicative. Further detail will be provided at project level following the adoption of specific structural works.
2.7.1	*How the measures will avoid adverse effects on site integrity;*			
2.7.2	*How the measures will reduce the adverse effects on site integrity;*			
2.7.3	*Evidence of how the measures will be implemented and by whom;*			
2.7.4	*Evidence of the degree of confidence in their likely success;*			
2.7.5	*A timescale, relative to the project, of when they will be implemented;*			
2.7.6	*Details of monitoring scheme and how mitigation failure will be addressed*			
2.8	Has consultation with NPWS / DAU taken place?	Yes		Consultation is mentioned in section B.11 but further elaboration is not included.

Natura Impact Statement				
Minimum Requirements				
	Question	**Yes**	**No**	**Comment**
2.9	Are there any significant impacts predicted?		No	Section B.10 states that "this plan will not adversely impact on the site integrity of the Natura 2000 network of sites". However, it is also stated in section B.10 that structural measures have not been finalised and therefore "it is not possible to determine all potential impacts at this plan level without the final project details."

Table 3: SEA Screening

SECTION 1 SEA SCREENING					
	Question	**Yes**	**No**	**Comment**	**Statutory Basis**
1.1	In reaching a determination of the requirement for SEA, have the criteria set out in Annex 1 of the SEA Directive and Schedule 2A of S.I. 436 or Schedule 1 of S.I. 435 been taken into account?	Yes		Section 4 of Screening Report (Available from the West CFRAM website) details the process of determination for SEA. Determination was made at pre-screening stage and assessed further against criteria.	SEA Directive Annex I (2001), Schedule 2A S.I. 436 (2004), Schedule 1 of S.I. 435 (2004)
1.2	Has a determination been made, in consultation with the DoEHLG, regarding the requirement for an appropriate assessment in accordance with the Habitats Directive?	Yes		Section 4.2.6 of Screening Report details the requirement for Appropriate Assessment along with consultation with the relevant government departments.	Habitats Directive Article 6(3)
1.3	Has the relevant competent authority consulted the prescribed environmental authorities as required and notified them of its determination?	Yes		Section 5.2 of Screening Report states compliance.	SEA Directive Article 3(6)/6(3), S.I. 435 (2004)
1.4	Has the relevant statutory authority made available for public inspection a copy of its determination on the requirement for SEA?	Yes		Made available on West CFRAM Website.	S.I. 435 (2004)
1.5	Does the screening determination clearly state whether SEA is required or not, who has made the decision and when?	Yes		Section 1.2 of Screening report. OPW (2011), state that SEA should be undertaken as a matter of good practice.	
1.6	If the P/P has been screened out of SEA, does it clearly demonstrate that it does not meet all/most of the criteria of Annex 1 and Schedule 2A of S.I. 436 and Schedule 1 of S.I. 435?	n/a	n/a	p/p has not been screened out of SEA.	

	Question	Yes	No	Comment	Statutory Basis
1.7	Has a description been provided in the ER of the screening process and subsequent determination?	Yes		Screening process is not detailed in the ER but is found in the Screening Report on the West CFRAM website. Determination is clearly stated in section 5.2 of ER.	

Table 4: SCOPING

SECTION 2 SCOPING					
	Question	**Yes**	**No**	**Comment**	**Statutory Basis**
2.1	Were the designated environmental authorities consulted when deciding on the scope of the information to be included in the Environmental Report?	Yes		Section 6 of the Scoping report (available from West CFRAM website) details scoping consultation.	SEA Directive Article 5(4)
2.2	Does the proposed scope of the report cover all the relevant information in accordance with Annex 1 of the SEA Directive and all of the points in Schedule 2 and Schedule 2B of S.I. 435 and S.I. 436? If not, have reasons for eliminating issues from further consideration been documented?	Yes		Scoping report covers all relevant information (available from the West CFRAM website).	
2.3	Has informal preliminary scoping taken place with the designated authorities prior to the commencement of the P/P making process?	Yes		Section 6.2.3 of Scoping Report details the organisations that have been consulted at scoping stage. Also detailed in section 8.3 of ER.	Guidelines for Regional Authorities & Planning Authorities: Implementation of SEA Directives Section 3.14

SECTION 2 SCOPING					
	Question	**Yes**	**No**	**Comment**	**Statutory Basis**
2.4	Have scoping meetings/workshops been held with (a) any of the designated environmental authorities, (b) relevant internal departments within the organisation and (c) other relevant statutory and non-statutory organisations?	Yes		Scoping workshop was held in June 2012. Details of attendees are listed in table 6.1 in Scoping Report.	
2.5	Where appropriate, if the zone of influence extends beyond the plan boundary, has transboundary notification and consultation been undertaken with other Member States & adjoining authorities on the scope of the SEA?	Yes		Consultation took place with adjoining authorities for areas beyond the UoM (table 6.1 of scoping report).	
2.6	As part of the scoping exercise, have the designated authorities been given an outline of: a) the geographical area involved (including a referenced and scaled map of the area) b) the nature of the plan and its intended lifespan c) the likely scale, nature and location of development within the area during the life of the plan (in broad terms) d) the predicted significant effects of this development	Yes		Designated authorities attended scoping workshop as stated in section 6.2.3 of Scoping Report (West CFRAM website).	Guidelines for Regional Authorities & Planning Authorities: Implementation of SEA Directives Section 3.17
2.7	Has a Scoping Report been prepared which clearly highlights key environmental resources, zone of influence of the P/P, alternatives, key existing environmental issues/problems and likely significant environmental effects of the P/P?	Yes		Available from West CFRAM website.	Guidelines for Regional Authorities & Planning Authorities: Implementation of SEA Directives Section 3.16

SECTION 2 SCOPING					
	Question	**Yes**	**No**	**Comment**	**Statutory Basis**
2.8	Does the scoping report reflect the size/level of detail in the P/P?	Yes		Scoping Report is adequate.	
2.9	Does the scoping report provide the designated authorities with sufficient information to form a view on the likely significant effects of implementation of the P/P?	Yes		Scoping report is thorough.	
2.10	Has a Scoping Issues Paper (for land use plans) been prepared to facilitate consultation? Have the environmental issues raised in the Issues paper been appropriately addressed in the scoping report?		No	n/a	
2.11	Have the public and other interested bodies been identified and consulted at the scoping stage?	Yes		Section 6.2.3 of Scoping Report identifies consultees who have been approached in relation to the scoping of the project.	
2.12	Have the teams responsible for the preparation of the P/P and the ER been involved in the scoping exercise?	Yes		These teams were responsible for the scoping exercise.	
2.13	Have the responses to the scoping exercises been included in the Scoping Report?	Yes		Responses are detailed in appendix D of Scoping Report.	
2.14	Has the Scoping Report been made public?	Yes		Available from West CFRAM website.	

SECTION 2 SCOPING					
	Question	**Yes**	**No**	**Comment**	**Statutory Basis**
2.15	Where an appropriate assessment is required and will be undertaken in conjunction with the SEA, have any environmental problems, indicators or other issues relevant to the assessment been identified, that need to be considered during the SEA process?	Yes		Section 2.3 of Scoping Report.	Habitats Directive Article 6

Table 5: CONSULTATION

SECTION 3 CONSULTATION					
	Question	**Yes**	**No**	**Comment**	**Statutory Basis**
3.1	Have the Draft P/P and accompanying ER been made available to the designated authorities and the public?	Yes		Section 4.4.6 of FRMP states compliance.	SEA Directive Article 6(1) & 6(3)
3.2	Have the designated environmental authorities and the public been given an early and effective opportunity to express their opinion on the draft P/P and the accompanying ER?	Yes		Dates for consultation and submissions stated in section 4.4.6 of FRMP are adequate.	SEA Directive Article 6(2) & 6(4)
3.3	Have the ER and the opinions expressed by the designated authorities and the public during consultation been taken into account during the preparation of the P/P?	Yes		Section 4.4.6 of FRMP states that plans were amended accordingly where appropriate.	Sea Directive Article 8
3.4	Where relevant, has a copy of the Draft P/P and the ER been forwarded to other Member States before its adoption?		No	Section 4.5 of FRMP states that there is no requirement for cross-border coordination in the Corrib River Basin.	SEA Directive Article 7

SECTION 3 CONSULTATION					
	Question	**Yes**	**No**	**Comment**	**Statutory Basis**
3.5	Where relevant, have the Member States been given a reasonable time frame to respond to the draft P/P and ER?		n/a	n/a	
3.6	Have the opinions expressed by other Member States during transboundary consultation been taken into account?		n/a	n/a	SEA Directive Article 7
3.7	Has a description of the outcome of all consultations (including transboundary) been documented in the ER?	Yes		Responses detailed in Appendix A of SEA Statement.	
3.8	Where a consultation recommendation has not been taken on board, has an explanation been provided of why?		No	Not mentioned in text.	
3.9	Have P/Ps and ERs for counties contiguous to the border with Northern Ireland been subject to transboundary consultation with the relevant Northern Ireland Environmental Authorities?		n/a	n/a	
3.10	If the zone of influence of the P/P extends beyond the P/P boundary, have relevant statutory Bodies/Authorities and adjoining Local Authorities been informed and consulted?	Yes		Relevant bodies/authorities consulted with at scoping stage (section 6.2.3 of Scoping Report).	

Table 6: DESCRIPTION

SECTION 4 Plan Description					
	Question	**Yes**	**No**	**Comment**	**Statutory Basis**
4.1	Has an outline of the contents and the main objectives of the P/P been provided in the ER?	Yes		Contents and objectives set out in section 2 of ER.	SEA Directive Article 5 Annex 1(a)
4.2	Has information been provided on the relationship of the P/P with other relevant P/Ps?	Yes		Section 10.6 of ER details links to other plans and strategies. Also detailed in Appendix A of ER.	SEA Directive Article 5 Annex 1(a)
4.3	Has a referenced and scaled map illustrating the geographical extend of the P/P area been included in the ER?	Yes		Figure 2.4 of ER.	
4.4	Have any relevant conflicts and/or synergies between the P/P objectives and the objectives of other P/Ps in the hierarchy (including transboundary) been identified and described?	Yes		Detailed in Appendix A of ER.	
4.5	Has the zone of influence of the P/P been described appropriately?	Yes		Section 2.4.4.3 of the ER defines the spatial scale which is described in detail in Section 7.	
4.6	Has the potential for transboundary effects of the plan been identified?	Yes		Section 4.5 of FRMP states that there is no requirement for cross-border coordination in the Corrib River Basin.	

Table 7: EXISTING ENVIRONMENT

SECTION 5 EXISTING ENVIRONMENT	
5.1	(a) Are the relevant aspects of the current state of the environment described? (b) Are any existing environmental problems described (in particular those relating to areas designated pursuant to the Birds and Habitats Directives) (c) Are the environmental characteristics of areas that are likely to be significantly affected by the P/P identified? (d) Is the likely evolution of the existing environment without the implementation of the P/P described? (e) Have any significant gaps in the baseline data been identified? (f) Have alternative/proxy data sources been identified where existing baseline data is unavailable?

Environmental Receptors	**A**	**B**	**C**	**D**	**E**	**F**	**Comment**
Biodiversity, flora and fauna	x	x	x	x	o	o	Section 7.6 of ER
Water (surface, ground, estuarine and coastal)	x	x	x	x	o	o	Section 7.3 of ER
Soil	x	x	x	x	o	o	Section 7.4 of ER
Landscape	x	x	x	x	o	o	Section 7.5 of ER
Cultural Heritage	x	x	x	x	o	o	Section 7.7 of ER
Population	x	x	x	x	o	o	Section 7.2 of ER
Human Health	x	x	x	x	o	o	Section 7.2 of ER
Air	o	o	o	o	o	o	Screened from report
Climatic Factors	x	x	x	x	o	o	Section 7.8 of ER
Material Assets	x	x	x	x	o	o	Not detailed in ER. Referred to in SEA Statement section 3.3
Interrelationships	x	x	x	x	o	o	Section 7.9 of ER

	Question	Yes	No	Comment	Statutory Basis
5.2	Has a description been included of any difficulties (such as technical deficiencies or lack of know how) encountered in compiling the required information?	Yes		Section 10.7 refers to data gaps.	SEA Directive Article 5 Annex 1
5.3	Does the relevant current state of the environment (baseline), as described, reflect: a) the availability of data? b) The size and level of detail of the P/P?	Yes		Baseline description reflects strategic nature of P/P appropriately.	
5.4	Have trends for key environmental receptors been presented and described using appropriate environmental data?	Yes		Described throughout section 7 of ER.	
5.5	What sources of environmental data and/or environmental information systems (e.g. GIS) have been used?			Data sources detailed throughout section 7 of ER. CSO, OSI, CDPs, LAPs, EPA data etc.	
5.6	Have existing environmental problems relevant to the P/P been identified and put into the context of relevant environmental objectives, standards, thresholds etc.?	Yes		Section 7.10 of ER sets out environmental constraints derived from the baseline study. These constraints were developed into objectives laid out in table 9.1.	

Table 8: OBJECTIVES, TARGETS AND INDICATORS

SECTION 6 OBJECTIVES, TARGETS AND INDICATORS					
	Question	**Yes**	**No**	**Comment**	**Statutory Basis**
6.1	Have any environmental protection objectives, established at International, European Community or Member State level which are relevant to the P/P been identified?	Yes		Table 9.1 of ER sets out FRM objectives relating to key international environmental protection objectives.	SEA Directive Article 5 Annex 1
6.2	Have these objectives and any environmental considerations been taken into account (placed in context/linked into the P/P) during the preparation of the P/P?	Yes		These objectives have fed directly into the creation of the FRMP.	SEA Directive Article 5 Annex 1
6.3	Are the proposed environmental objectives linked to appropriate targets and indicators?	Yes		Table 9.1 of ER links objectives to indicators and targets.	
6.4	In relation to environmental targets; (a) have limits or thresholds been established where appropriate? (b) have timescales been set where appropriate?		No	Targets do not set out thresholds or timescales at strategic level.	
6.5	Are the environmental indicators capable of the following: • describing trends in the baseline environment? • demonstrating the likely significant environmental impact(s) of the implementation of the P/P? • being used in a monitoring programme? • providing an early warning of significant unforeseen adverse effects? • prioritising key environmental impact(s)? • is the number of environmental indicators manageable, in terms of time and resources?	Yes		Cannot provide early warning of unforeseen adverse effects.	
6.6	Have the environmental objectives been linked to targets and indicators for those environmental receptors identified as being significantly affected?				

Environmental Receptor	O	T	I	Comment
Biodiversity, flora and fauna	n	n	Y	Table 9.1 of ER
Water (surface, ground, estuarine and coastal)	n	n	Y	
Soil	n	n	Y	
Landscape	Y	n	n	
Cultural Heritage	n	n	Y	
Population	n	n	Y	
Human Health	n	n	Y	
Air	n	n	n	Screened from report
Climatic Factors	n	n	n	Targets/Indicators not stated
Material Assets	Y	n	n	Section 3.3 of SEA Statement
Fisheries	n	n	Y	
Environmental objective (O): In SEA, objectives are broad, overarching principles which should specify a desired direction of change, for example, 'reduce air pollution' or 'improve human health'.				
Environmental target (T): A target usually underpins an objective often having a time deadline that should be met and should be accompanied by limits or thresholds				
Environmental indicator (I): Indicators are used to track the achievements of objectives and targets, describe the baseline situation, monitor the impact of the proposed plan or programme on the environment and monitor impacts				
Proxy indicators: A measure of activity resulting from a P/P which provides information on environmental impact without the need for a direct measure of an environmental receptor				

Table 9: CONSIDERATION OF ALTERNATIVES

SECTION 7 CONSIDERATION OF ALTERNATIVES					
	Question	**Yes**	**No**	**Comment**	**Statutory Basis**
7.1	Have 'reasonable alternatives' been identified and described?	Yes		Section 12 of ER details alternatives considered.	SEA Directive Article 5 Annex 1
7.2	Have the reasons for selecting (a) the alternatives and (b) the preferred alternative been provided?	Yes		Section 4 of SEA Statement refers to selection of alternatives.	SEA Directive Article 5 / Article 9 Annex 1
7.3	Has a description of how the assessment of alternatives was undertaken been provided?	Yes		Section 2.4.4.2 of ER describes the multi-criteria analysis method.	SEA Directive Article 5 Annex 1
7.4	Are the potential alternatives proposed assessed against the relevant environmental objectives and against each other?	Yes		Appendix G of FRMP sets out potential outcomes and assesses them with weighted scores.	
7.5	Has a clear explanation been given of the likely significant environmental effects of each alternative?	Yes		Section 10 of ER sets out likely significant effects to the environment.	
7.6	Has clear written justification been given for the choice of the preferred alternative?	Yes		Section 4.3 of SEA Statement sets out justification.	
7.7	Do the alternatives considered reflect the objectives and hierarchy of the P/P?	Yes		Alternatives are in line with objectives.	

Table 10: SIGNIFICANT EFFECTS ON THE ENVIRONMENT

SECTION 8 LIKELY SIGNIFICANT EFFECTS ON THE ENVIRONMENT					
	Question	**Yes**	**No**	**Comment**	**Statutory Basis**
8.1	Are the likely significant effects on the environment described?	Yes		Detailed in section 10 of ER. Material assets referred to in SEA statement.	SEA Directive Article 5 Annex I (f)
8.2	Are significant effects described in relation to: - current environmental conditions - relevant environmental standards and thresholds	Yes		Detailed in section 10 of ER.	
8.3	Are appropriate impact prediction methods used, and, are impacts quantified where relevant?	Yes		Section 10 of ER sets out impact prediction in a quantified manner in sets of tables throughout the section.	
8.4	Have the methods used for impact prediction been described?	Yes		Section 5 of ER details impact prediction methods.	

Table 11: MITIGATION MEASURES

SECTION 9 MITIGATION MEASURES					
	Question	**Yes**	**No**	**Comment**	**Statutory Basis**
9.1	Have mitigation measures been proposed for all significant adverse effects on the environment of implementing the P/P?	Yes		Table 11.1 of ER sets out mitigation measures for all potential impacts at strategic level. Section 2.3 of ER Addendum details further mitigation measures.	SEA Directive Article 5 Annex 1
9.2	Have the proposed mitigation measures been incorporated into the P/P?	Yes		Section 6 of the FRMP details mitigation measures.	
9.3	Have the proposed mitigation measures been linked, where appropriate, to specific relevant significant environmental effects?	Yes		Table 11.1 of ER links mitigation measures to environmental effects.	
9.4	Has an explanation been provided where mitigation of significant adverse effects is not proposed?		No	n/a at strategic level.	
9.5	Are the mitigation measures proposed within the remit of the statutory authority? If not, is there reasonable certainty that they will be implemented?		No	Section 11 of ER states that mitigation will be developed further when site specific impacts are identified (not at strategic level).	
9.6	Do the proposed mitigation measures have potential to fully avoid or mitigate the relevant impact(s)? If not, have additional measures been considered?		No	Section 11 of ER states that mitigation will be developed further when site specific impacts are identified (not at strategic level).	
9.7	Is a description provided of any likely post mitigation residual impacts included?		No	Not considered at this stage.	

SECTION 9 MITIGATION MEASURES					
	Question	**Yes**	**No**	**Comment**	**Statutory Basis**
9.8	If the appropriate assessment shows that the P/P would have a significant impact on the integrity of a Natura 2000 site, has the statutory authority considered further alternatives to try to avoid these impacts?	n/a		n/a	

Table 12: MONITORING PROGRAMME

SECTION 10 MONITORING PROGRAMME					
	Question	**Yes**	**No**	**Comment**	**Statutory Basis**
10.1	Has a monitoring programme of significant environmental effects of implementing the P/P been described?	Yes		Although a program has not been established at strategic level, details are set out in Section 13.3 of ER which describe how the monitoring program will be considered at project stage. Section 5.1 of SEA Statement sets out that a monitoring plan can be put in place when "the plan is initiated".	SEA directive Article 10 Annex 1, S.I. Nos 435 & 436 (2004)
10.2	Does the monitoring programme allow unforeseen adverse effects to be identified, for instance, where assumptions underpinning the ER's impact predictions may not come true in practice?	Yes		The objectives for the monitoring program that are set out in section 13.3 plan to identify unforeseen adverse effects.	SEA directive Article 10 Annex 1, S.I. Nos 435 & 436 (2004)
10.3	Have thresholds / trigger levels been assigned which will determine the need for appropriate remedial action?	Yes		The objectives for monitoring set out in section 13.3 detail thresholds and triggers which will be used to create an appropriate monitoring program at project level.	SEA Directive Article 10 Annex 1, S.I. Nos 435 & 436 (2004)
10.4	Are responsibilities for carrying out the monitoring programme clearly defined?	Yes		Section 5.5 of ER states that the OPW will be responsible.	Planning Guidelines for SEA section 7.7

SECTION 10 MONITORING PROGRAMME					
	Question	**Yes**	**No**	**Comment**	**Statutory Basis**
10.5	Are responsibilities for responding to any significant negative environmental effects of implementation of the P/P clearly defined?	Yes		It is noted that a Government Structure is in place whereby further EIA & AA study will be carried out at project level.	
10.6	Are responsibilities for identifying and responding to unforeseen adverse effects of implementation of the P/P clearly defined?	Yes		This will be addressed through project level EIA & AA	
10.7	Has the frequency of monitoring been specified in the monitoring programme?		No	Specific monitoring frequency is not set out at strategic level.	
10.8	Has the frequency of reporting on the results of the monitoring programme been specified?	Yes		Section 13.3 states that monitoring will inform the 6-yearly update to the FRMP.	
10.9	Does the monitoring programme address significant gaps identified in the baseline data?	Yes		Section 13.3 details ongoing data collection that will be involved in the monitoring process.	Planning Guidelines for SEA section 7.4
10.10	Does the monitoring programme utilise existing monitoring arrangements where appropriate?		No	Not detailed at strategic level.	
10.11	Does the monitoring programme include provision for the ongoing review of environmental targets and indicators?	Yes		Objectives set out in section 13.3 for the monitoring program detail the ongoing review of data.	
10.12	Has provision been made to produce regular monitoring reports during the time period of the P/P?		No	Not detailed at strategic level.	
10.13	Does the monitoring programme address transboundary effects, if any?		No	n/a	

SECTION 10 MONITORING PROGRAMME					
	Question	**Yes**	**No**	**Comment**	**Statutory Basis**
10.14	What provisions are there to make the results and interpretation of the monitoring programme available to the designated environmental authorities and the public?		No	Not detailed at strategic level.	

Table 13: ENVIRONMENTAL REPORT AND NON-TECHNICAL SUMMARY

SECTION 11 ENVIRONMENTAL REPORT AND NON-TECHNICAL SUMMARY					
	Question	**Yes**	**No**	**Comment**	**Statutory Basis**
11.1	Does the ER contain all of the aspects listed in Annex 1 of the SEA Directive and Schedule 2 and 2B of S.I. 435 and 436 of 2004?	Yes			SEA Directive Article 5 Annex 1
11.2	Does the ER include a non-technical summary?	Yes		Pre-text.	SEA Directive Article 5 Annex 1
11.3	Does the non-technical summary clearly summarise the following:				SEA Directive Article 5 Annex 1
	a) Contents & Main Objectives of the draft P/P	Yes			
	b) Current state of the environment and evolution	Yes			
	c) Environmental characteristics of area significantly affected	Yes			
	d) Existing environmental problems	Yes			
	e) Environmental protection objectives	Yes			
	f) Significant effects on the environment	Yes			
	g) Mitigation Measures	Yes			

SECTION 11 ENVIRONMENTAL REPORT AND NON-TECHNICAL SUMMARY					
	Question	**Yes**	**No**	**Comment**	**Statutory Basis**
	h) Alternatives	Yes			
	i) Monitoring	Yes			
11.4	Has a description been provided in the ER of the screening process and subsequent determination?	Yes		Screening referred to in section 5.2 of ER. Full process set out in screening report available on the Western CFRAM website.	
11.5	Have the responses to the scoping exercises been included in the ER? Has an explanation been given as to how these responses were considered?	Yes		Stated in section 9.1 of ER.	
11.6	Is the non-technical summary concise and easy to understand?	Yes		Not comprehensive.	Planning guidelines on SEA section 4.41
11.7	Has a description of the outcome of all consultations (including transboundary) been documented in the ER?	Yes		Section 8 of ER sets out consultation outcomes.	
11.8	Have relevant references, glossary of terms and scaled maps (with source identified) been included?	Yes			

2 CONCLUSION

Fehily Timoney & Company were appointed to review the environmental assessment and compile a report on each Flood Risk Management Plan. This report determines that the procedures and statutory obligations set out in the relevant environmental regulations, including but not limited to SI Nos. 477 of 2001 and 435 of 2004 and any relevant amending regulations have been fully complied with.

All relevant environmental considerations have been duly and effectively assessed. It is in order for the Minister to decide that the Flood Risk Management Plan will not adversely affect the integrity of Natura Sites and the plans are not likely to have significant effects on the environment.