Review of the Effectiveness of SEA – Regional Planning Guidelines

KEY FINDINGS & RECOMMENDATIONS

Environmental Protection Agency

The Environmental Protection Agency (EPA) is a statutory body responsible for protecting the environment in Ireland. We regulate and police activities that might otherwise cause pollution. We ensure there is solid information on environmental trends so that necessary actions are taken. Our priorities are protecting the Irish environment and ensuring that development is sustainable.

The EPA is an independent public body established in July 1993 under the Environmental Protection Agency Act, 1992. Its sponsor in Government is the Department of the Environment, Community and Local Government.

OUR RESPONSIBILITIES

LICENSING

We license the following to ensure that their emissions do not endanger human health or harm the environment:

- waste facilities (e.g., landfills, incinerators, waste transfer stations);
- large scale industrial activities (e.g., pharmaceutical manufacturing, cement manufacturing, power plants);
- intensive agriculture;
- the contained use and controlled release of Genetically Modified Organisms (GMOs);
- large petrol storage facilities;
- waste water discharges.

NATIONAL ENVIRONMENTAL ENFORCEMENT

- Conducting over 2,000 audits and inspections of EPA licensed facilities every year.
- Overseeing local authorities' environmental protection responsibilities in the areas of – air, noise, waste, waste-water and water quality.
- Working with local authorities and the Gardaí to stamp out illegal waste activity by co-ordinating a national enforcement network, targeting offenders, conducting investigations and overseeing remediation.
- Prosecuting those who flout environmental law and damage the environment as a result of their actions.

MONITORING, ANALYSING AND REPORTING ON THE ENVIRONMENT

- Monitoring air quality and the quality of rivers, lakes, tidal waters and ground waters; measuring water levels and river flows.
- Independent reporting to inform decision making by national and local government.

REGULATING IRELAND'S GREENHOUSE GAS EMISSIONS

- Quantifying Ireland's emissions of greenhouse gases in the context of our Kyoto commitments.
- Implementing the Emissions Trading Directive, involving over 100 companies who are major generators of carbon dioxide in Ireland.

ENVIRONMENTAL RESEARCH AND DEVELOPMENT

- Co-ordinating research on environmental issues (including air and water quality, climate change, biodiversity, environmental technologies).

STRATEGIC ENVIRONMENTAL ASSESSMENT

- Assessing the impact of plans and programmes on the Irish environment (such as waste management and development plans).

ENVIRONMENTAL PLANNING, EDUCATION AND GUIDANCE

- Providing guidance to the public and to industry on various environmental topics (including licence applications, waste prevention and environmental regulations).
- Generating greater environmental awareness (through environmental television programmes and primary and secondary schools' resource packs).

PROACTIVE WASTE MANAGEMENT

- Promoting waste prevention and minimisation projects through the co-ordination of the National Waste Prevention Programme, including input into the implementation of Producer Responsibility Initiatives.
- Enforcing Regulations such as Waste Electrical and Electronic Equipment (WEEE) and Restriction of Hazardous Substances (RoHS) and substances that deplete the ozone layer.
- Developing a National Hazardous Waste Management Plan to prevent and manage hazardous waste.

MANAGEMENT AND STRUCTURE OF THE EPA

The organisation is managed by a full time Board, consisting of a Director General and four Directors.

The work of the EPA is carried out across four offices:

- Office of Climate, Licensing and Resource Use
- Office of Environmental Enforcement
- Office of Environmental Assessment
- Office of Communications and Corporate Services

The EPA is assisted by an Advisory Committee of twelve members who meet several times a year to discuss issues of concern and offer advice to the Board.

Review of the Effectiveness of SEA – Regional Planning Guidelines

Key Findings & Recommendations

The West Regional Authority
Údarás Réigiúnach an Iarthair

epa
Environmental Protection Agency
An Ghníomhaireacht um Chaomhnú Comhshaoil

Acknowledgements

Author:

Teresa O'Reilly, West Regional Authority

**Review of the Effectiveness of SEA – Regional Planning Guidelines
Key Findings & Recommendations**

Published by the Environmental Protection Agency, Ireland

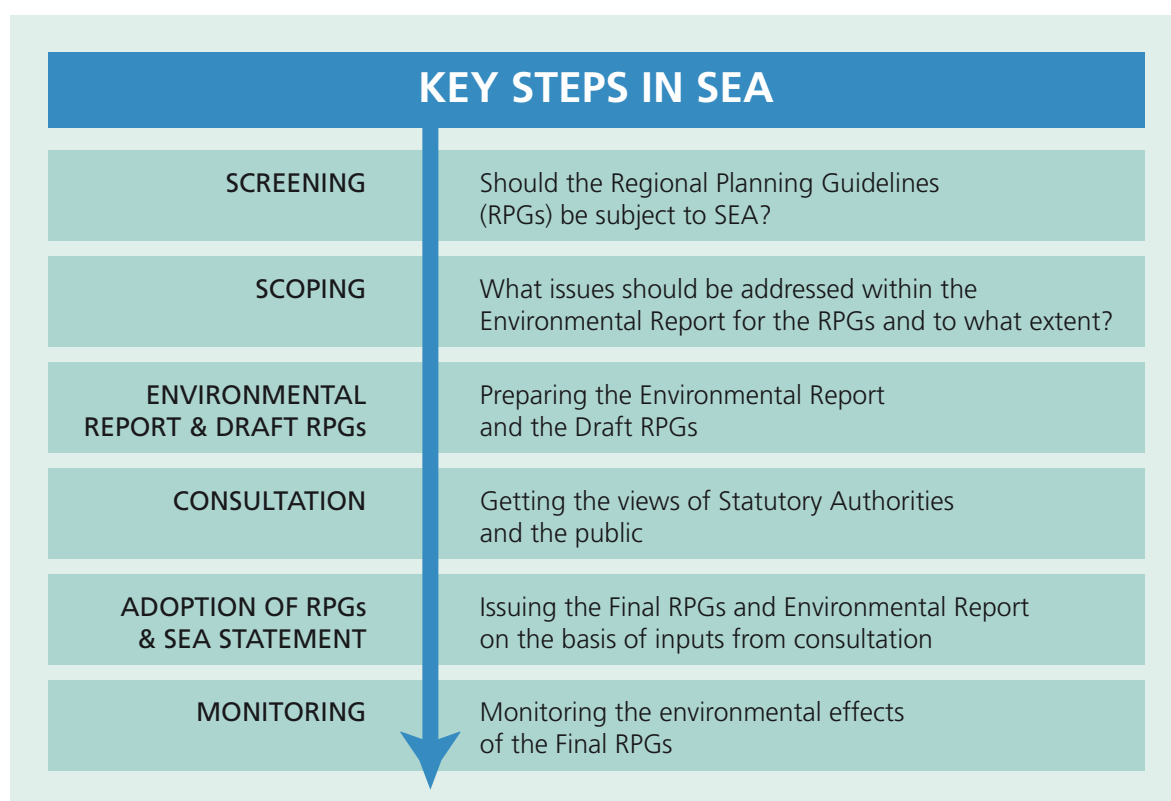ISBN: 978-1-84095-474-6

Printed on recycled paper

Executive Summary

Executive Summary

Introduction

The Strategic Environmental Assessment (SEA) Directive came into force in 2001 and was transposed into Irish law in 2004. The Directive aims to provide a high level of protection of the environment, and to contribute to the integration of environmental considerations into plan preparation and adoption with a view to promoting sustainable development. There are a number of key steps in SEA which are outlined in **Figure 1** for ease of reference.

Figure 1: The Key Steps in Strategic Environmental Assessment[1]

KEY STEPS IN SEA	
SCREENING	Should the Regional Planning Guidelines (RPGs) be subject to SEA?
SCOPING	What issues should be addressed within the Environmental Report for the RPGs and to what extent?
ENVIRONMENTAL REPORT & DRAFT RPGs	Preparing the Environmental Report and the Draft RPGs
CONSULTATION	Getting the views of Statutory Authorities and the public
ADOPTION OF RPGs & SEA STATEMENT	Issuing the Final RPGs and Environmental Report on the basis of inputs from consultation
MONITORING	Monitoring the environmental effects of the Final RPGs

Eleven years after the Directive (2001/42/EC) came into force and nearly eight years after the passing of Irish SEA Regulations 2004 (S.I. 435 and 436), the Environmental Protection Agency (EPA) has initiated this review to examine how effective the SEA process was in the preparation of the Regional Planning Guidelines (RPGs) 2010–2022 in Ireland. This Study is part of a national study entitled 'Review of Effectiveness of SEA in Ireland' prepared on behalf of the EPA by RPS Consultants. The results of this

---

1 Adapted from Enterprise Ireland (Enviro Centre) (2012) 'The SEA Directive' http://www.envirocentre.ie (Accessed 30th June, 2012).

RPG Study were incorporated into the national study, though it also has specific recommendations for the next review of the Regional Planning Guidelines.

SEA effectiveness can be direct: it can lead to changes in a plan that reduce the plan's negative impacts and increase its benefits. It can also be indirect, for instance through better understanding of the environment and planning by planners and the public and improved participation in plan-making by the public.

Methodology

The research investigated both direct and indirect effectiveness by asking:

- Did the SEA process identify significant effects of implementing the RPGs?

- Did the SEA process inform and support effective integration of environmental concerns into the RPG-making process?

- What opportunities exist to improve the SEA process?

- How effective is SEA governance?

To answer these questions, 15 aspects of SEA were investigated:

0.	Screening stage[2]	**8.**	Mitigation measures*
1.	Scoping stage	**9.**	Environmental Report and Non-Technical Summary
2.	Consultation on Draft RPGs & Environment Report	**10.**	Amendments to the Draft RPGs following consultation
3.	Description of RPGs and review of other plans	**11.**	SEA Statement
4.	Existing (baseline) environment*	**12.**	Post-adoption including monitoring
5.	Objectives, indicators and targets*	**13.**	Appropriate Assessment
6.	Alternatives*	**14.**	Influence of SEA, integration with the RPGs
7.	Likely significant effects of the RPGs*	**15.**	SEA governance

* Part of the SEA Environmental Report.

---

2 SEA Screening was not required as part of the RPG Review process and most Regional Authorities chose to skip this step by proceeding directly to Scoping. Please note that the 'Review of Effectiveness of Strategic Environmental Assessment in Ireland' examines SEA Screening and is included in this study for completeness.

The research was informed by:

1. A detailed review of seven RPG SEA **Case Studies** which provided information about the quality of the SEA documentation and the underlying SEA process.

2. **Interviews** with Regional Authority staff involved with the case studies to shed further light on how the Environmental Reports were used to inform the making of the RPGs and their experiences with regard to SEA and how it is governed (i.e. the bodies that oversee the SEA process and make sure it is being carried out).

From this information, findings were drawn about the effectiveness of SEA in the RPG process and recommendations made about how SEA effectiveness could be improved in the next review of the RPGs.

Overall Findings – Effectiveness of the SEA Process

Figure 1 summarises how well different aspects of SEA were carried out in the RPG review process and the strength of links between inputs and outcomes of SEA.

Figure 2: Effectiveness of SEA Inputs and Outcomes in the RPGs
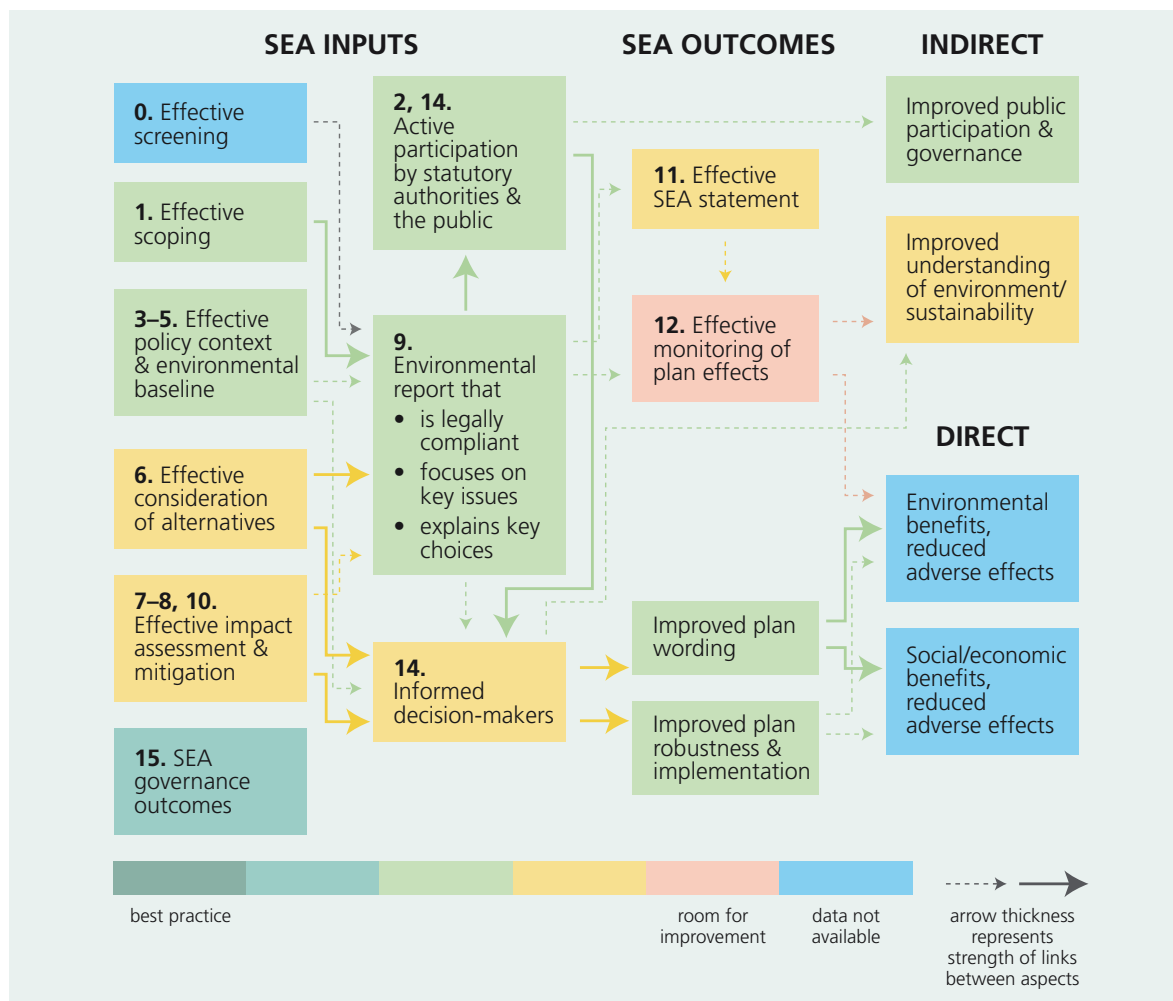
Inputs

1. During SEA Scoping, the major regional environmental problems should be identified first, i.e. what should go into the Environmental Report. Following this, agreement should be reached on what does not need to go in (though this can be difficult as RPGs can affect many aspects of the environment).

2. The Statutory (SEA) Environmental Authorities[3] were very helpful and provided useful advice and information during consultation on the RPGs; however, public involvement in SEA was very limited.

3–5. All Environmental Reports provided a good description of the RPGs, policy context, and an environmental baseline, although there were gaps in available data.

6. The consideration of SEA alternatives (i.e. development options) was limited in some cases as some planners felt that certain decisions made in higher-level planning policy documents and previous RPGs must be followed, which left little scope for new alternatives. Planning legislation requires RPGs to be consistent with the National Spatial Strategy.

7–8. All impact assessment (including cumulative, synergistic, etc. and the interrelationships between the impacts) and mitigation could be improved.

9. The quality of the Environmental Reports was high, but they often do not focus tightly enough on key issues; and often they do not explain clearly why certain choices were made or how SEA mitigation measures were integrated into the RPGs.

10. Amendments to the RPGs were all considered in SEA though the reports could have been made available for public viewing.

11. One RPGs SEA Statement was not prepared at the time of this review. There is a legal requirement to prepare such documents and they are a very useful record of the SEA process.

12. Monitoring of the environmental impacts of implementing the Regional Planning Guidelines has not begun (at least one year and eight months following their adoption).

13. Appropriate Assessment (AA) (under the Habitats Directive) and SEA should be more effectively integrated or linked.

14. Greater 'buy-in' to the benefits of SEA by decision makers is needed in some cases. SEA should not be treated as a parallel exercise but should be integrated with the RPG-making process.

15. SEA governance is generally strong, but there could be stronger legal emphasis on the need to complete SEA Statements. Statutory Environmental Authorities could prepare guidance notes on various aspects of SEA as similar errors are being repeated.

Outcomes

Planners suggest that SEA significantly improved the RPG process and made the RPGs more environmentally robust, with environmental resources being considered in greater detail than would have been the case (in the absence of the SEA Directive).

---

3   During the RPG review process the Statutory Environmental Authorities were the EPA, DEHLG, DCENR and NIEA.

Monitoring of the RPGs must be carried out regularly to ensure that SEA leads to environmental, social or economic improvements and prevents environmental, social or economic harm.

Overall the SEA process was an effective means of integrating environmental considerations into the RPGs to provide a high level protection of the environment.

SEA helped to identify the significant effects on the environment and integrate environmental concerns into the RPGs.

SEA governance is broadly effective. However, there are clear aspects of the process that need to be improved.

The quality of the SEA *inputs* in Ireland varies from 'very good' (e.g. scoping) to leaving 'room for improvement' (e.g. mitigation and monitoring), as shown in Table 1 below. Understanding of the quality of SEA outcomes is hampered by lack of buy-in from decision-makers and a lack of monitoring. Table 1 summarises the findings of the case study review.
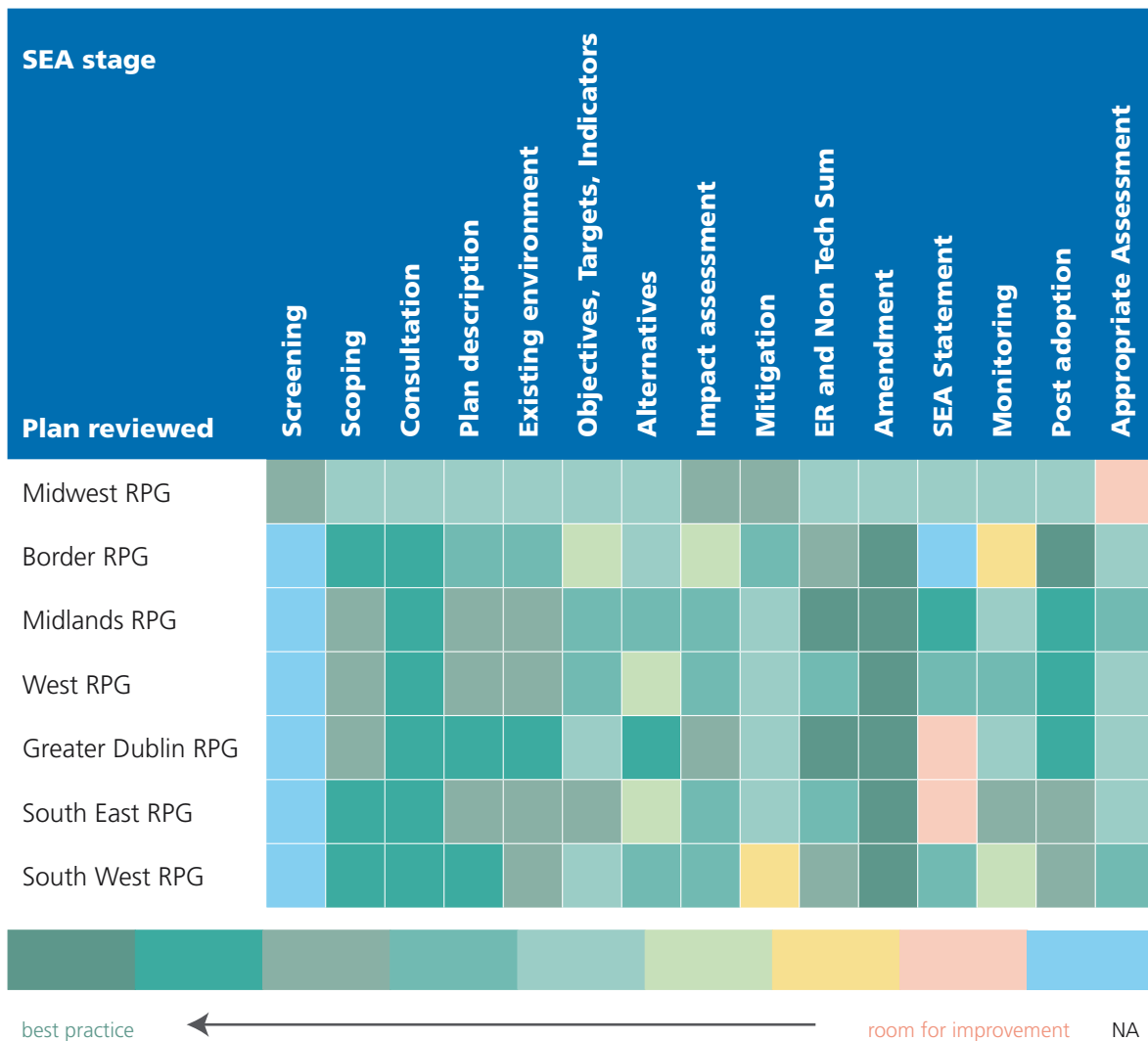
Table 1: Summary of Case Study Findings

SEA stage / Plan reviewed	Screening	Scoping	Consultation	Plan description	Existing environment	Objectives, Targets, Indicators	Alternatives	Impact assessment	Mitigation	ER and Non Tech Sum	Amendment	SEA Statement	Monitoring	Post adoption	Appropriate Assessment
Midwest RPG															
Border RPG															
Midlands RPG															
West RPG															
Greater Dublin RPG															
South East RPG															
South West RPG															

best practice ← → room for improvement   NA

Table 2 discusses the key strengths and weaknesses of SEA in the RPG process.

Table 2: Strengths and Weaknesses of SEA Inputs

SEA Stages	Strengths	Weaknesses
1. Scoping	■ Consultation periods open for 8+ weeks (4 more than required) ■ Good consultation seeking to engage with the public and a wide range of organisations – workshops/meetings were held with statutory authorities ■ RPG Reports complement SEA Reporting stages (i.e. pre-draft RPG Issues Paper & Scoping Paper) ■ RPG Report on consultation (Director's Report) can include SEA responses	■ AA and SEA scoping are not integrated or informing each other ■ SEA Scoping Report is not obligatory ■ Difficult to scope out issues at a regional level ■ Difficult to determine the level of detail in the Environmental Report at a regional level, especially as AA can be very specific
2. Consultation on Draft RPGs & ER	■ Consultation periods open for 10+ weeks (6 more than required) ■ Good involvement of SEA Statutory Environmental Authorities ■ Meaningful consultation with the public and a wide range of organisations ■ Consultations resulted in numerous alterations to the RPGs (robustness) ■ RPG Reports complement SEA Reporting stages (i.e. Draft RPGs and SEA Environmental Report) ■ RPG Report on consultation (Director's Report) includes responses on SEA ■ New 'Best Practice Guidance Note' on Transboundary consultation developed	■ Failure to document Scoping responses and link with key outputs from SEA Environmental Report

best practice ⟵ room for improvement

SEA Stages	Strengths	Weaknesses
3. Description of RPGs & review of other plans	■ Descriptions of RPGs and other plans are generally good	■ Wide variation in number of influencing plans and programmes referenced ■ Key plans and programmes were not listed under separate headings (such as 'water', 'landscape', etc.) ■ Conflicts between higher level plan objectives or objectives that the RPGs must follow/be consistent with, were not documented ■ This section was not always clearly linked to the 'environmental objectives'
4. Existing environment	■ Some good examples of constraint/sensitivity mapping ■ Baseline information is a 'state of the environment report' for each region	■ Resource-intensive ■ Environmental information is not concise ■ 'Significant gaps' in environmental information not documented or addressed ■ 'Evolution of the environment in the absence of the RPGs' was not addressed for each SEA topic (e.g. cultural heritage, material assets, etc.) or at all ■ Mapping techniques (e.g. modelling) not explained; some maps are too small ■ No mapping facilities or lack of a centralised, consistent and easily accessible database ■ Scoping issues not addressed in the Environmental Report
5. Objectives, indicators and targets	■ Objectives linked with higher level plans, etc. but are tailored to meet requirements of RPG SEA ■ Objectives, indicators and targets (O/I/T) linked to each other and linked to environmental problems identified in the 'Existing Environment' ■ O/I/T categorised by topic (e.g. human health, climate, etc.) ■ Most Environmental Reports contain a manageable number of indicators	■ Failure to set limits/thresholds for intervention or to set dates to meet targets ■ Regional Authority (RA) remit is limited – indicators are often parameters that the RA do not have authority over ■ Rigorous assessment of I/T (e.g. types of indicators used) and likely success of addressing environmental issues was not carried out

best practice ← → room for improvement

SEA Stages	Strengths	Weaknesses
6. Alternatives	■ SEA widens the scope of alternatives considered ■ GIS constraints/sensitivity mapping is a useful support	■ Generation of reasonable/realistic alternatives is a big challenge ■ Influence of planning policy hierarchy/political decisions limits choices available ■ Some alternatives are based on previous RPG alternatives, that is, they were not devised in the SEA or were retrospectively included in the SEA Environmental Report ■ Limited assessment of alternatives and no detailed analysis of the chosen alternative ■ Environmental Report did not outline reasons for the inception of the alternatives ■ Early days for mapping models and more testing is required ■ 'Do-nothing option' or 'business as usual' option was not used ■ Failure to utilise Appropriate Assessment in the development and assessment of alternatives may have potential impacts on Natura 2000 network (SACs and SPAs) ■ Limitations of each alternative was not discussed (e.g. infrastructural availability) ■ Unrealistic alternatives cannot be implemented
7. Likely significant effects	■ Constraints mapping is a useful tool ■ Environmental objectives are used to assess the plans	■ Failure to assess all categories of effects (in particular cumulative, synergistic, secondary, permanent and temporary effects) and interrelationships between effects ■ Failure to explain how impacts were predicted ■ Uncertainties as to the 'likely significant effects' on the environment of a strategic or indicative policy or objective in the RPGs ■ Poor presentation of Matrix Assessment (i.e. RPG objectives compared to SEA objectives) or poor discussion of same ■ 'Likely significant effects' not distinguished from other baseline environmental pressures
8. Mitigation measures	■ Proposed mitigation measures were specific to potential effects of implementing the RPGs ■ The wording of policies/ objectives provides strong commitments to protect environmental vulnerabilities identified	■ Mitigation measures often not incorporated into the final RPGs or it is unclear how SEA/AA influenced the RPGs ■ Potential residual (outstanding) impacts which may arise are not explored

best practice ←——————————————————————→ room for improvement

SEA Stages	Strengths	Weaknesses
9. Environmental Report and Non-Technical Summary	■ GIS and constraints maps are particularly useful ■ Non-Technical Summary (NTS) is a key means of ensuring that decision makers and non-environmental stakeholders are aware of SEA findings ■ NTS are concise ■ Evidence-based information supported better decision making in the RPGs	■ Long SEA Environmental Reports are discouraging to read ■ Non-Technical Summary (NTS) must refer to technical SEA headings but ambiguous language was also used, the text should be simplified ■ No use of mapping in the NTS or it is of insufficient size/scale ■ No references in the Environmental Report, no map licence details or no legends
10. Amendments to the RPGs	■ Alterations/Amendments were screened through SEA/AA ■ Indicates that consultations were taken seriously and enhanced the RPGs	■ Documentation and transparency of amendment stage needs improvement ■ As significant changes were not proposed to any of the RPGs, the Statutory Environmental Authorities or the public were not consulted at this stage
11. SEA Statement	■ SEA process very transparent once an SEA Statement has been prepared correctly and outlines the role that consultation played	■ Lack of formal requirement for the Statutory Environmental Authorities (SAs) to review SEA Statements; preparation of SEA Statements is not policed and contents are inconsistent ■ Lack of guidance on requirements ■ No Draft SEA Statement available for public consultation ■ SEA Statement not summarising the key decisions taken by the SEA/AA and RPG teams ■ Lack of mapping in SEA Statements

best practice ←——————————————— room for improvement

SEA Stages	Strengths	Weaknesses
12. Post-RPG adoption including monitoring	■ Good links between potential effects, mitigation and proposed monitoring in most cases ■ Monitoring programmes can be altered if required ■ Monitoring is based on existing monitoring arrangements ■ Monitoring will inform the next review of the RPGs	■ Monitoring of the RPGs has not begun ■ Guidance on how to create a monitoring programme is required as there is a lack of clarity on what is required from SEA monitoring (responsibility for monitoring, coordination, implementation, frequency of reporting (including presentation), monitoring 'unforeseen impacts' and trigger levels for intervention based on monitoring ■ Lack of national monitoring standards for land use plans ■ No one is responsible for checking that mitigation measures are being implemented ■ No requirement to report to the SAs or the public ■ No agreement with other authorities to carry out new monitoring procedures to suit new indicators proposed by Regional Authority ■ RPG and SEA monitoring proposals not combined
13. Appropriate Assessment	■ AA Screening and/or AA Stage 2 carried out by Regional Authorities	■ SEA and AA are poorly integrated from the beginning of the RPG review ■ AA was not used in the development of SEA alternatives ■ RPGs drafted prior to the release of DEHLG/ NPWS Guidelines on AA in Ireland
14. Influence of SEA, integration with plan-making	■ SEA has had a positive influence and improved the RPGs ■ SEA is identifying and addressing significant effects; it helps to avoid environmentally damaging development or mitigates significant effects. Therefore it provides a basis for better planning decisions ■ Beginning the SEA process early positively influenced the RPGs ■ SEA raised awareness/ understanding of environmental considerations and has provided a learning outcome for planners	■ AA and SEA are separate processes and should be combined ■ SEA/AA/Flood Risk Assessment and RPGs were not well integrated ■ Difficulties in identifying which changes to the RPGs resulted from the SEA process ■ SEA is resource-intensive – Regional Authorities relied on Local Authority staff within their region or consultants to carry out work ■ Quality of the content of SEA Reports should be improved, with a focus on the effective integration of the SEA outcomes into the RPGs ■ Need a concerted effort to engage decision makers (Elected Members), regional and Local Authority management staff throughout the process ■ Environmental issues must be properly identified

best practice ⟵ room for improvement

SEA Stages	Strengths	Weaknesses
14. (continued)	■ SEA makes planners address other Directives such as the Water Framework, Habitats and Floods Directives ■ EPA is a key information resource and had a significant influence on SEAs and RPGs ■ Cost- and resource-effective where qualified project manager is in place ■ Consultation (SEA & RPG) benefited the RPG review process at all stages ■ Awareness of valuable information within Local Authority departments	■ SEA is not a simple exercise and is challenging given the statutory time constraints in the Planning & Development Act 2000, as amended ■ SEA/AA integration in the RPG document can result in disjointed final documents (e.g. with caveats at the end of policies)
15. SEA governance	■ SAs are appropriate for the process with the EPA providing a critical role ■ Best engagement of Statutory Authorities was witnessed in the early–mid stages of the RPG review	■ A perception that SEA (especially when compared to AA) does not have much legislative weight and so can be ignored ■ No single body is responsible for governing the process (i.e. EPA, DECLG, etc. have an informative role) ■ No provisions for review and/or enforcement of SEA Statements or monitoring ■ Unclear whether all SAs are equipped to respond to SEA consultation and to engage with the process (e.g. with dedicated staff) ■ No independent body tasked with conducting reviews of SEA procedures to enhance their effectiveness

best practice ← ——————————————————— → room for improvement

What Influence Did the SEA Process Have in Identifying the Significant Effects of Implementing the RPGs?

SEA enhanced the understanding and awareness of environmental issues in the Regional Authority areas and it enhanced the RPG review process by contributing to the creation of more robust and sustainable documents than would otherwise have been the case. Regional Authorities identified the environmental pressures/problems within their region and took these issues into consideration when preparing the RPGs.

Meaningful consultation during the RPG Review process led to successful identification of significant environmental effects of implementing the RPGs though the 'significant effects' must be distinguishable from all other environmental problems identified in the SEA Environmental Report. Difficulties arose with the identification of all types of 'significant effects' (e.g. short-term impacts, permanent impacts, collective impacts (cumulative), etc.) and the interactions (interrelationships) between the effects (e.g. water pollution impacts on fish stocks as well as drinking water supplies for human consumption). There was no clear indication of how the types of effects were predicted.

Some of the Regional Authorities used computer modelling techniques to help with the analysis of significant effects on the environment. When compiling information on the state of the environment, the Regional Authorities struggled with out-of-date information and limited access to data which was relevant or which could be used for creating maps.

The Regional Authorities also found it difficult to describe the likely state of the environment (evolution of the environment) if the RPGs were not implemented.

Policies in the RPGs can be strategic and indicative/not specific (e.g. support economic development), so Regional Authorities found it difficult to state exactly what significant environmental effects could happen. While not an ideal method the RPGs included notes (caveats) in order to prevent impacts occurring. The caveats require lower level plans (Development Plans or Local Area Plans) or development projects to further examine the likely significant effects on the environment.

Did the SEA Process Inform and Support Effective Integration?

Interviewees considered that the SEA process ensured that environmental concerns were integrated into the text and policies of the RPGs and this created better documents which should result in better planning decisions in the long run.

The study revealed that SEA should begin as soon as the review of the RPGs begins. RPG and SEA/AA teams who prepare the documents must work closely together. If the teams work closely together, the reports will be focused on the key environmental problems and will be able to identify how they should be taken into account in the RPGs. AA was a relatively new procedure which must be considered in the SEA and the RPGs; however, limited experience with it meant that these documents were not well linked to each other.

Planners involved in the RPG and SEA processes are much more aware of the need to integrate environmental concerns into all aspects of their work and they became aware of the valuable environmental data which is collected by various sections of the Local Authorities (e.g. water services, heritage) in the regions.

SEA is a very valuable tool but it represented a huge challenge for all the Regional Authorities. A significant amount of time was invested by RPG/SEA/AA teams, Regional Authority staff, Local Authority staff, decision-makers (Elected Members), statutory authorities, etc. The Planning and Development Act 2000, as amended imposes time restrictions on reporting on certain aspects of the RPGs. While all Regional Authorities sought to integrate environmental considerations into the RPGs, the limited time within which to gather all the necessary information on SEA and integrate it into the RPGs may have impacted on the quality of the reports and the overall success of actually integrating the changes into the RPGs. It was difficult in some cases to identify what specific changes were made to the RPGs as a result of the SEA process.

Consultation is a key part of both the RPG and SEA processes. It was particularly useful to have key RPG/SEA reports available for public consultation at the same time (e.g. Draft RPGs & Environmental Report). During these stages the statutory (SEA) environmental authorities gave Regional Authorities help, advice and information to guide them through the RPG and SEA processes. It is considered that the outcomes of consultation significantly improved the RPGs.

The study revealed that the decision makers (Elected Members) should be well informed of the benefits of SEA and how the outcomes of SEA have shaped the RPGs, throughout the RPG review process. The Non-Technical Summary should be clear and concise and it is particularly important to promote SEA and explain the process to decision makers and members of the public.

How Effective is SEA Governance?

For the purposes of the RPG Review, SEA was carried out in accordance with Irish SEA Regulations S.I. 436 (2004) and it is clear that this legislation influenced the preparation of the RPGs. SEA legislation seeks to ensure that transparent, evidence-based decisions are made during the preparation of the RPG which protect the environment.

The study revealed that the restrictions of SEA legislation are not considered as powerful as other environmental assessments such as AA (Habitats Directive), so environmental problems noted in the SEA could be ignored by decision-makers if they chose to do so. While this did not occur in the RPG review process, the meaning and intention of SEA (from the SEA Directive) must be clarified.

Best practice guidance notes on several aspects of the SEA process are required, to improve how these are presented and considered. The legislation is much stronger in the earlier stage of SEA (e.g. Scoping/Environmental Report) with much less focus on the latter reporting stages (SEA Statement and Monitoring). While minor changes to legislation could assist in addressing this, no major changes are required. Instead existing guidance should be updated, new best practice notes developed or training and awareness provided.

The statutory (SEA) environmental authorities' role is very useful to plan-making authorities and their input greatly improves the outcomes of SEA; however, not all statutory environmental authorities may have dedicated staff for the SEA process and there was a distinctive overlap in many of the issues raised in submissions received by the Regional Authorities. Statutory authorities should be sufficiently resourced to engage with the plan-making process at every stage.

What Opportunities Exist to Improve the SEA Process? Key Recommendations

This study revealed that there is potential to improve the SEA process, which has been progressing well over the past eight years in Ireland. Key recommendations are listed below, with priority recommendations highlighted in blue.

Guidance

A1	Prepare a series of best practice guidance notes (development of alternatives, SEA Statements, monitoring, determining significant effects, mitigation techniques, evolution of the environment in the absence of a plan, etc.)
A2	Prepare guidance for plan makers on the integration of SEA and AA and plan-making, and guidance on how to document changes to the plan as a consequence of SEA/AA
A3	Prepare detailed guidance on cumulative effect assessment, in combination effects assessment and how to link SEA and AA in the assessment process

Training and Awareness

B1	Develop and provide SEA and AA training modules to promote integration between SEA and AA
B2	Develop and provide targeted SEA training for decision makers (public representatives), senior management staff, planners, engineers in local and regional government and the public to raise awareness of SEA, its responsibilities and benefits
B3	Develop and provide training on the assessment of effects (short, medium and long term, cumulative, synergistic, permanent, temporary, direct, indirect, interrelationships, etc.) including the use of Geographical Information Systems
B4/B5	Convene regional and national SEA/AA/FRA Fora in association with the Regional Planning Authorities to exchange and promote best practice approaches in the Regions

Data Collation, Provision and Sharing

C1	Develop a central environmental database with access to legislation and all documents from the statutory authorities. SEA best practice examples should be available and a web-based SEA Portal should be developed. Mapping should be kept up to date
C2	Statutory (SEA) environmental authorities to keep their websites updated

Governance and Legislation

D1 Establish a national SEA/AA Technical Forum comprising members of the statutory authorities to:

    a) Promote overall compliance with the requirements of the SEA Directive & Regulations

    b) Seek to ensure that SEA Statements are prepared and reviewed, mitigation is implemented, monitoring is conducted and reports are reviewed

    c) Develop and agree a set of standardised key national environmental objectives, targets and indicators

D2 Issue a Circular Note on Article 8 of the SEA Directive; that is, what are the legal implications if SEA is prepared but not adequately 'taken into account' in the plan-making process?

D3 Ensure existing statutory environmental authorities have sufficient resources to engage effectively at key stages of the SEA process

Conclusions

This review aimed to provide evidence on how effective SEAs were in integrating environmental considerations into the RPGs 2010–2022. While all Regional Authorities sought to engage and effectively integrate the findings of SEA into the RPGs, some fundamental elements of the process were not properly addressed or fully utilised, highlighting the need for guidance. Despite this, SEA had a very positive effect on the RPG documents and successfully raised the awareness of environmental pressures or problems in each Region.

The report has highlighted that the EPA plays a major role in the current governance arrangements and the EPA and other Statutory Authorities have influenced the shaping of the SEA and RPGs.

It is clear that SEA influenced the RPG decision-making process, however key areas for improvement identified in the report relate to the need for Best Practice Guidance Notes on many aspects of the SEA process, clarification on the strength of SEA legislative requirements, and training and awareness.

The findings of this study have been incorporated into the 'Review of Effectiveness of SEA in Ireland' prepared by RPS for the Environmental Protection Agency. The recommendations outlined above and the more detailed recommendations in Chapter 7, Appendices 1 and 2 of the main report provide the basis for a significant improvement in the SEA process during the next review of the RPGs and for effective monitoring of the adopted RPGs.

Successful implementation of the recommendations in this report will enhance the effectiveness of the SEA process by improving the assessment of likely significant effects, improving integration of environmental concerns into the RPG-making process and improving governance. This will ensure that regional planning policy documents are sustainable and represent best practice in Ireland, thereby setting a high standard for lower level land use plans and programmes.

Main Report

Table of Contents

List of Figures

List of Tables

1.0 Introduction and Context

In 2011, the Environmental Protection Agency (EPA) initiated a review of Strategic Environmental Assessment (SEA) in Ireland. The West Regional Authority was commissioned by the EPA to carry out a review of the effectiveness of SEA in the Regional Planning Guidelines (RPGs) 2010–2022. RPS consultants were commissioned to undertake a wider 'Review of Effectiveness of SEA in Ireland'. Methodology developed by RPS was used in this study, and the reports follow a similar format. The findings of this RPG study have informed and have been integrated into the findings of the national report that ran concurrently with this study.[1]

Article 1 of the SEA Directive states that the objective of SEA 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 and to ensure that the likely significant effects of plans and programmes are addressed.

1.1 Objective of the SEA Effectiveness Review

The SEA Directive 2001/42/EC *on the assessment of the effects of certain plans and programmes on the environment* has been in place since 2001, and Irish SEA Regulations (S.I. 435 & 436) were enacted in 2004, almost eight years ago. The main purpose of SEA is to ensure that the significant environmental effects of a plan or programme are assessed and made available to decision-makers, during the preparation and prior to the adoption of a plan or programme. SEA, when applied fully, has potential to be a key driver of sustainable development, with particular focus on environmental protection.

The findings and views expressed are based on evidence gathered from case study analysis and interviews, and are not the views of the EPA. The Review includes an impartial analysis of the EPA's performance and roles.

---

1 Please refer to EPA website for EPA/RPS (2012) *Review of Effectiveness of SEA in Integrating Environmental Considerations into Plans and Programmes in Ireland*.

1.2 Determining Effectiveness

The primary purpose of the Review is to determine how effective the SEA process was in integrating environmental considerations into the RPGs with reference to the following key questions:

Question 1	What influence did the SEA process have in identifying the significant effects of implementing the RPGs?
Question 2	Did the SEA process inform and support effective integration of environmental concerns into the RPG-making process?
Question 3	What opportunities exist to improve the SEA process?
Question 4	How effective is SEA governance?

The effectiveness of SEA relates to how much it changes things (**outcomes**); for instance:

Directly	Whether it leads to changes to *RPG wording* to improve its environmental benefits and reduce its environmental costs (linked to Question 1).
	Whether *RPG implementation* is leading to environmental improvements and avoiding environmental harm (linked to Question 1).
	Whether it makes the RPGs *clearer, easier to implement, and more robust* to challenge (linked to Questions 1 and 2).
	Whether it improves *social and economic* aspects of the RPGs.
Indirectly	Whether it improves *planners' understanding* of the environment, sustainability and/or their RPGs; and thus possibly the impacts of subsequent Development Plans, Local Area Plans and projects (linked to Questions 1 and 2).
	Whether it improves *public participation and governance/democracy* (linked to Questions 1, 2 and 4).
	Whether it improves *integration between the various parties involved (Appropriate Assessment team, plan makers, SEA team, stakeholders and the public)* (linked to Question 2).

In turn, effective SEA requires effective **inputs** (which are linked to Table 1 and Figure 1 below), including:

- Application of SEA to all relevant plans and programmes (effective *screening*) (No. 0);

- Effective scoping (No. 1) including consultation with Statutory Authorities (SAs);

- A good-quality *Environmental* Report (No's 3–5, 6, 8, 9, 14) which:

  - Is legally compliant;

  - Focuses on key issues and likely significant effects and is not over-detailed or over-long;

  - Focuses on reasonable and realistic alternatives; and,

  - Explains the main choices faced by decision-makers.

■ Active *participation by statutory authorities and the public during the scoping stage and the Environmental Report stage* (No's 2, 14);

■ *Informed decision-makers* who make decisions that take into account the findings of SEA (No. 14);

■ *Monitoring* of RPGs' environmental impacts (No. 12); and,

■ *Training of all staff and SEA Practitioners.*

Table 1 identifies the key areas of SEA assessed in this study. They form the basic structure for the review and analysis of strengths and weaknesses in Section 7 and to assist in answering the four key questions posed above.

Table 1: Key Areas of SEA Assessed

0.	Screening stage[2]	**8.**	Mitigation measures
1.	Scoping stage	**9.**	Environmental Report and Non-Technical Summary
2.	Consultation on draft RPGs & Environmental Report	**10.**	Amendments to the Draft RPGs following consultation
3.	Description of RPGs and review of other plans	**11.**	SEA Statement
4.	Existing (baseline) environment	**12.**	Post-adoption including monitoring
5.	Objectives, Indicators and Targets	**13.**	Appropriate Assessment
6.	Alternatives	**14.**	Influence of SEA, integration with the making of the RPGs
7.	Likely significant effects of the RPGs	**15.**	SEA governance

---

2 SEA Screening was not required as part of the RPG Review process, and most Regional Authorities chose to skip this step by proceeding directly to Scoping. Please note that the 'Review of Effectiveness of Strategic Environmental Assessment in Ireland' examines SEA Screening and is included in this study for completeness.

Figure 1 identifies the relationships that exist between key areas of SEA, with red arrows denoting stronger links. It also shows how they relate to the SEA outcomes discussed above.

Figure 1: Relationships between Key Areas of SEA
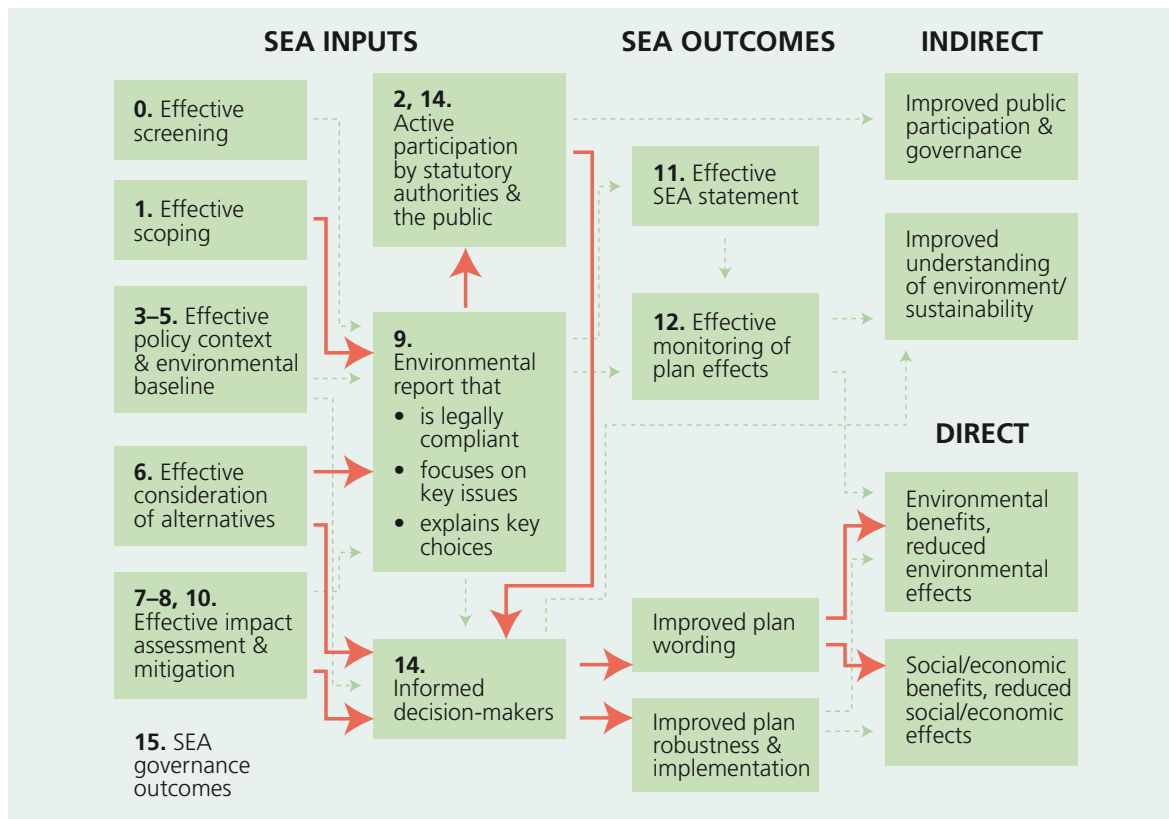
Note: Red arrows denote stronger links. Numbers relate to the key areas of SEA assessed.

The four main research questions of this study are tested through an analysis of the key areas assessed, as follows:

The main four research questions…	are tested through an analysis of…
▪ What influence did the SEA process have in identifying significant effects of implementing the RPGs?	7, 8, 10 as per Table 1 and Figure 1 above
▪ Did the SEA process inform and support effective integration?	Direct outcomes
▪ How effective is SEA governance?	15 as per Table 1 and Figure 1 above
▪ What opportunities exist to improve the SEA process?	Inputs that were not carried out well and that had a significant influence on the outcomes

1.3 Structure of the Review

Section 2 of this report provides an overview of who Regional Authorities are, what their function is, the RPGs as they sit in a planning policy hierarchy, the history of SEA or environmental assessment in the context of the RPGs 2004–2016, and other environmental assessments (derived from the Habitats and Floods Directives) that were part of the RPG 2010–2022 review process.

Section 3 outlines the methodology for the study.

Section 4 contains a detailed analysis of the key stages of SEA and provides an overview of how key staff viewed the influence of SEA and its integration with the RPGs, and their views on the effectiveness of SEA Governance.

Following this, Section 5 examines existing governance arrangements, the role of the statutory environmental authorities in consultation stages and their potential influence on the SEA process.

Section 6 then outlines the strengths and weaknesses of SEA and its effectiveness based on the previous sections answering the first, second and fourth research questions.

Finally, Section 7 outlines recommendations for improving the SEA process in future RPG reviews in response to the third research question.

2.0 Regional Authorities and Regional Planning Guidelines

2.1 Regional Authorities

The function of Regional Authorities[3] is to promote coordination, consistency and compatibility with programmes, plans, policies, proposals or objectives of the Government or any Minister of the Government. In 2004, all eight Regional Authorities made RPGs for their functional area in accordance with the Planning and Development Act 2000 as amended. In 2009 a statutory review began and this ensured that new RPGs were in place by 2010 in accordance with legislation.

The eight Regional Authorities are highlighted in Figure 3 below. RPGs are prepared jointly for the Dublin and Mid-East Regional Authority areas.

2.2 Regional Planning Guidelines

Figure 2: Planning Policy Strategy & Legislation

The National Spatial Strategy (NSS) 2002–2020, which was published in 2002 and updated in 2010,[4] seeks to achieve a balance of social, economic and physical development and population growth throughout Ireland (DECLG[5], 2002). It provides the driving force behind the RPGs first introduced in 2004. The RPGs establish a regional focus of national policy for lower level land use plans. Since the introduction of the Planning and Development (Amendment) Act 2010, these documents, namely Development Plans and Local Area Plans, must be consistent with the RPGs.

---

3 Regional Authorities were established under the Local Government Act 1991 and Regional Authority Establishment Orders 1993.

4 'NSS: 2010 Update and Outlook' was published in 2010 to reaffirm the commitment to implementing long-term planning frameworks such as the NSS.

5 DECLG was formally known as DEHLG.

RPGs aim to provide a framework for the long-term sustainable development and growth of a region and to ensure the successful implementation of the NSS at the regional, county and local levels.

Figure 3: Regional Authority Areas in Ireland

Includes Ordnance Survey Ireland data reproduced under OSi Licence Number 2012/15CCMA/Galway County Council. Unauthorised reproduction infringes Ordnance Survey Ireland and Government of Ireland copyright. © Ordnance Survey Ireland, 2012. All rights reserved.

The 'Planning Context' of 'Regional Planning Guidelines' and where they 'fit' in the spatial planning system is set out in Figure 4 below. This categorises the hierarchy from the top European level to national, regional and local levels.

Figure 4: Planning Context and Other Relevant Plans or Strategies

	Planning Hierarchy		Relevant Directives, Plans & Strategies
EU	European Spatial Development Perspective 1999	↓↓↓↓↓	**European Directives; Conventions & Agreements** (e.g. EU SEA Directive, EU Habitats Directive, EU Floods Directive, Ramsar Convention, Convention on Biological Diversity)
NATIONAL	National Spatial Strategy 2002 & Implementing the NSS 2010 Update & Outlook	↓↓↓↓	**Other National Strategies, Plans, Guidelines and Legislation** (e.g. Planning & Development Act, 2000 as amended, National Development Plan, Rural Development Plan, Section 28 (Planning Act) Planning Guidelines, National Biodiversity Plan, National Sustainable Development Framework, National Climate Change Strategy)
REGIONAL	Regional Planning Guidelines 2010–2022	↓↓↓	**Other Regional Plans, Strategies and Programmes** (e.g. Regional Waste Management Plan/Strategy, River Basin Management Plan, Catchment Flood Risk Assessment and Management Programme)
LOCAL	County, City & Town Development Plans	↓↓	**Other Local Level Strategies and Plans** (e.g. Galway County Development Board Strategy, Galway County Council Corporate Plan, County Heritage and Biodiversity Plans)
	Local Area Plans	↓	

Source: Adapted from West Regional Authority (2010) *Regional Planning Guidelines for the West Region 2010-2022*.

The Planning and Development Act 2000, as amended provides the legislative framework for the preparation of the RPGs. The Act requires the Regional Authorities to prepare RPGs for a 12 year period but which must be reviewed every six years. The Minister for the Environment, Heritage and Local Government issued a Direction to each Regional Authority in 2008 to review existing RPGs 2004–2016 and prepare new RPGs for their administrative areas.

The Planning and Development (Regional Planning Guidelines) Regulations 2009 set out procedural requirements including those for SEA under the SEA Directive 2001/42/EC, Appropriate Assessment (AA) under the Habitats Directive 92/43/EEC and flood risk management under the Floods Directive 2007/60/EC which are consistent with Ministerial Guidelines.[6]

The 2009 Regulations state that 1) the NSS is relevant in determining strategic planning policies and the Regional Authority must take account of NSS and any updates; and 2) the RPGs must use population targets for the Region, Gateways & Hubs as prepared by the DEHLG in 2009 (Source: Irish Government, 2009[7]).

The RPGs contain broadly similar chapters which are: Context – Strategic Vision – Strategies for Economic Development – Settlement, Population & Housing – Transport & Infrastructure – Environment & Amenities – Social Infrastructure & Community Development – and Implementation.

2.3 Strategic Environmental Assessment and Regional Planning Guidelines

2.3.1 Regional Planning Guidelines 2004 – 2016 (Past)

The SEA Directive was transposed into Irish law through S.I. 435 & 436 2004[8]. The 2004 SEA Regulations made SEA a mandatory requirement in the preparation of RPGs[9]. The previous RPGs 2004–2016 were prepared prior to the implementation of the SEA Regulations and SEA Statutory Instruments and thus some limited assessment of the *'likely significant effects on the environment of implementing the plan'* was conducted. The following sets out the relevant sections pertaining to environmental assessment of the 2004 RPGs.

---

6   Guidelines under Section 28 of the Planning & Development Act 2000, as amended.

7   www.environ.ie/en/Legislation/DevelopmentandHousing/Planning/FileDownLoad,21081,en.pdf (Accessed 30/06/2012).

8   The 2004 Regulations were amended in 2011 since the adoption of the Regional Planning Guidelines 2010–2022.

9   S.I. 436 2004.

Table 2: Relevant Sections Relating to SEA in the 2004 Regional Planning Guidelines

Regional Authority	Relevant Section in RPGs relating to SEA
Border	'Strategic Environmental Assessment'
Midlands	'6.4 Environmental & Social Impact Appraisal'
West	'6.8 Environmental Impact Matrix Assessment'
Mid-West	'6: Impact Assessment' – the Mid-West matrix assessment was based on environmental criteria and social impact indicators
South-East	'8.7 Environmental Appraisal of Regional Development Strategy'
South-West	'Appendix 1: Guidelines Draft Environmental Report'
Dublin & Mid-East	'Environmental Appraisal Framework (RPG) Appendix A & Strategic Environmental Appraisal of Policies Addendum'

With the exception of Dublin and the Mid-East, the 2004 RPG reports included a 'broad-brush' view or examination of the effects through a simplified matrix assessment. An Environmental Appraisal Framework Appendix and SEA Addendum formed part of the Dublin and the Mid-East RPGs. This represented the most comprehensive type of assessment undertaken across all of the RPGs at the time.

In the 'Strategic Environmental Appraisal' key policies in the Draft RPGs were appraised against SEA environmental objectives, which in turn were linked to targets and indicators. The SEA section states that the steps of the SEA Directive were undertaken and policies were reworded or omitted. Some potential significant effects on the environment due to proposed policies and development scenarios were explored. SEA environmental objectives were developed and a matrix-type assessment was included to examine whether environmental objectives and policies were compatible or divergent. SEA Monitoring was also proposed.

2.3.2 Regional Planning Guidelines 2010–2022 (Present)

With the 2004 SEA Regulations (S.I. 435 & 436) firmly in place, the review and preparation of RPGs 2010–2022 would be informed by SEA. Following the publication of the 2004 RPGs, new DECLG (NPWS & OPW) guidance became available. Of particular relevance are the *Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities on the Habitats Directive, Article 6, 2009* and *The Planning System and Flood Risk Management Guidelines for Planning Authorities, 2009*.

Planning & Development (Regional Planning Guidelines) Regulations 2009 set out the necessary procedural requirements for conducting SEA and other requirements relating to Appropriate Assessment (AA) under the Habitats Directive 92/43/EEC and considerations of Flood Risk Management (FRA) consistent with Ministerial Guidelines.[10] The Planning & Development Act 2000, as amended and the Planning & Development SEA and RPG Regulations 2004 and 2009 set out the timelines that must be met for the preparation of the RPGs, SEA, public consultation and reporting on consultation phases.

2.3.3 SEA and Its Links with Other Environmental Assessments

Other environmental assessments that formed part of the RPG documents, namely AA and Regional Flood Risk Appraisal, will not be explored in this study. However, certain elements overlap and will be referenced in the document and supporting case studies.

Habitats Directive 92/43/EEC & Appropriate Assessment

Article 6(3) of the EU Habitats Directive (on the conservation of natural habitats and of wild fauna and flora)[11] requires that:

Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to Appropriate Assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.

Source: European Commission (1992) Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora.

The Habitats Directive requires plans and projects to be subject to an AA if the plan or project is not directly connected with or necessary to the management of a Natura 2000 site or network (*which includes Special Areas of Conservation and Special Protection Areas*) but may have potential implications (*significant effects either individually or in combination with other plans or projects*) on a site's conservation objectives.

DECLG Circular Letter SEA 1/08 & NPWS 1/08, *Appropriate Assessment of plans under Article 6 of the Habitats Directives* in 2008[12] sought to address plan-makers' responsibilities with regard to AA. While the Habitats Directive had been in place since 1992 and Natural Habitats Regulations have

---

10 DEHLG/OPW (November, 2009) *The Planning System & Flood Risk Management – Guidelines for Planning Authorities*.

11 The Habitats Directive is implemented in Ireland through the European Communities (Natural Habitats) Regulations of 1997.

12 DEHLG Circular Letter SEA 1/08 & NPWS 1/08, 15 February, 2008, http://npws.ie/media/npws/publications/circulars/media,6678,en.pdf (Accessed 20/05/2012).

This Circular has been replaced by Circular Letter NPW 1/10 & PSSP 2/10 (2011) Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities (DEHLG, 2011 Circular Letter).

www.npws.ie/media/npws/publications/circulars/Circular%20NPW1-10%20&%20PSSP2-10%20Final.pdf (Accessed 20/05/2012).

been in force in Ireland since 1997, AA – the mechanism required *'to consider the possible nature conservation implications of any plan or project on the Natura 2000 site network before any decision is made to allow that plan or project to proceed'* (Source, DECLG, 2011 Circular Letter) – had not been used by plan-making authorities in the preparation of land use plans.

The 2008 DECLG Circular Letter refers to a European Commission ruling that Ireland had failed to properly transpose and implement the Habitats and Birds Directives (DECLG, 2008 Circular Letter). Land use plans up to this point had failed to take account of the Directives and the requirements of Article 6(3) were not being assessed.

The Planning and Development (Regional Planning Guidelines) Regulations 2009 (Irish Government, 2009) included this new requirement in the review of the RPGs. Subsequently AAs were prepared as part of the RPGs review. As 'biodiversity, flora and fauna' are key environmental receptors to be included in SEA Environmental Reports, the outcomes of the AA should be directly linked with the SEA reporting and assessment process. However, as indicated, DECLG Guidelines on AA only became available at the end of 2009, when the RPG review process was well under way. At this point, some of the Regional Authorities had Draft RPGs available for public consultation. This is an important consideration in this study, particularly when considering whether AA was well integrated into the SEA process.

Floods Directive 2007/60/EC & Regional Flood Risk Appraisal

The 2007 Floods Directive *on the assessment and management of flood risks* introduced the requirement for Member States to assess and manage flood risks. In 2009 the DECLG and the Office of Public Works (OPW) produced Guidelines *'to introduce comprehensive mechanisms for the incorporation of flood risk identification, assessment and management into the planning process'* (Source: DECLG/OPW, 2009. p. iv).

The Guidelines state that *'implementation of the Guidelines will be achieved through actions at the national, regional, local authority and site-specific levels'* (Source: DECLG/OPW, 2009. p. iv). The Guidelines highlight the need for *'strategically focused flood risk appraisal at the regional level as an integral input to the preparation of regional planning guidelines (RPGs) which act as a framework for ongoing co-ordination of the development plans of local authorities in their areas'* (Source: DECLG/OPW, 2009. p. iv).

Regional Flood Risk Appraisals were prepared by each Regional Authority to examine areas of existing flood risk, determine how flood risk could be managed, and establish a policy framework for Development Plans and Local Area Plans to ensure flood risk management is incorporated into the planning process. 'Water' is an environmental receptor that must be examined through SEA and therefore 'flood risk management' is a key consideration of this process.

Again it is important to note that flood risk appraisal or assessment of land use plans was also a new component in the RPG Review process and for all land use plans.

3.0 Methodology

3.1 Methodology and Approach

This section outlines the methodology for the review of the effectiveness of SEA in the RPG process. As previously indicated, this study is part of a national SEA Effectiveness Review and findings of this study have been incorporated into the RPS study. The main tasks undertaken correspond with the 'Key Areas of SEA' identified in Table 1, and are given in Table 3.

Table 3: Key Stages of the Study

Review Stage	Description	Reference
Case Study Review	**Analysis of key areas of SEA (No's 1–13)** This stage analysed the seven RPG case studies focusing on how findings and outcomes of the SEA were integrated into the RPGs.[13] Case study questions were developed by RPS in consultation with the EPA (see Appendix 3), and detailed case study reports for each Regional Authority are found in a supporting technical document (refer to Table 1, no's 1–13).	Section 4
Interview of Key Staff & Regional Authority comments on individual case studies	**Analysis of key areas of SEA (No's 14–15)** Each Regional Authority was issued a copy of its individual completed case study. It was asked to comment and provide any additional information on the SEA process that may not have been evident through an examination of the SEA and RPG reports by the author. Feedback was received from seven Regional Authorities.[14] Follow-up interviews were carried out with five key staff members directly involved in the RPG/SEA process. The interviews sought to elicit staff views and reveal their experiences on the effectiveness of SEA and its integration with the RPG process, as well as their views on current SEA governance (refer to Table 1, no's 14–15).	Section 4

---

13 RPS conducted a case study of the Mid-West Regional Planning Guidelines; its outcomes have been combined in this review for completeness.

14 Note that the author of this study represented the eighth Regional Authority and therefore did not contribute to this section.

Review Stage	Description	Reference
SEA governance arrangements	**Analysis of key areas of SEA (No. 15)** Through further analysis of the Case Studies and Interviews, this section reviewed the existing SEA governance arrangements. It focused on the consultative role of the statutory environmental authorities and their potential influence on the SEA process, the effectiveness of consultation, guidance and procedures, and the perception of SEA (refer to Table 1, no. 15).	Section 5
Conclusions on SEA effectiveness & recommendations	**Review of Strengths & Weaknesses** Analysis of the findings from the case studies, interviews and existing governance arrangements identified strengths and weaknesses in the SEA process. **Recommendations & Key areas for Improvement** Overall recommendations were made to improve the effectiveness of SEA in the next review of the RPGs.	Section 6 & 7 Appendix 1 & 2

Throughout the study, the key areas of SEA (see Table 1) were reviewed to analyse how effective SEA integration, consideration of likely significant effects and governance were addressed.

Figure 5: Summary of SEA Effectiveness Review of the Regional Planning Guidelines
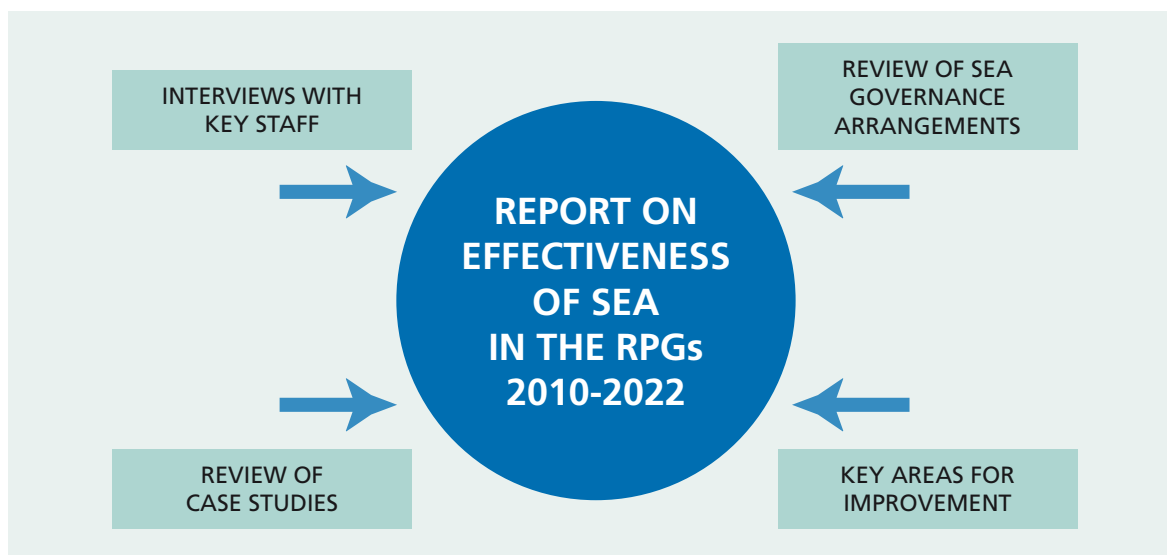
4.0 Review and Analysis of the Integration Elements (Case Studies and Interviews)

4.1 Analysis of Case Studies

The following section provides a detailed analysis of how the findings and outcomes of seven SEAs were integrated into the RPGs adopted in 2010. A full list of recommendations from the review of the Case Studies is contained in Appendix 1.

Figure 6 is a guide to SEA and RPG reports prepared by Regional Authorities at each stage in the RPG Review process.

Figure 6: SEA and RPG Documents Prepared at Each Stage of the Review Process

1. Pre-Draft Consultation	
SEA Scoping Issues Paper	Regional Planning Guidelines Issues Paper

↓

2. Consultation Outcomes	
SEA Scoping Report	Report on Submissions (Pre-Draft RPGs Director's Report)*

↓

3. Draft Reports & Public Consultation on Draft Documents	
Draft SEA Environmental Report	Draft Regional Planning Guidelines

↓

4. Consultation Outcomes	
SEA Screening of Alterations* & Amendment of Environmental Report	Report on Submissions (Draft RPGs Director's Report)*

↓

5. Final Reports	
SEA Statement*	Regional Planning Guidelines 2010-2022*

* Refers to 'Statutory reports'.

The following section refers to the documents prepared by the Regional Authorities in an abbreviated manner. 'GDA' refers to the documents for the Greater Dublin Area (i.e. the joint regional authorities of Dublin and the Mid East); 'WRA' refers to the West Regional Authority; 'MWRA' refers to the Mid West Regional Authority; 'MRA' refers to the Midlands Regional Authority; 'SERA' refers to the South East Regional Authority; 'SWRA' refers to the South West Regional Authority; and 'BRA' refers to the Border Regional Authority.

0. Screening Stage

Usually SEA Screening is the first step in the SEA process and is the one that determines whether a plan is likely to have a significant environmental effect. If it will, a full SEA should be conducted. A full SEA is mandatory in the preparation or review of RPGs. Therefore Screening is not required and the Regional Authorities could proceed directly to 'Scoping of the Environmental Report'. One Regional Authority (MWRA) prepared a Screening Report and a determination on SEA was subsequently outlined in the 'Director's Report on Submissions received' at the pre-draft RPG consultation phase.

1. Scoping Stage

Figure 7: Focus on Environmental Issues[15]

Scoping as an element of the SEA mechanism determines the range of environmental issues and the level of detail to be contained in an Environmental Report. Scoping should 'narrow the focus' of issues to be appropriately addressed in the Environmental Report and RPGs.

---

15 Source: News Talk (2011) 'Ireland situation not as bad as it looks, says Oxford Professor', 18 August. www.newstalk.ie/2011/news/6ireland-situation-not-as-bad-as-it-looks-says-oxford-professor56 (Accessed on 04/11/2011).

RPG Issues Papers were released by each Regional Authority during the pre-draft RPG consultation phase. The purpose of an Issues Paper is to aid public consultation and seek to engage the public in matters of strategic importance for the review of the RPGs. One Regional Authority's RPG Issues Paper (SWRA) did not refer to the SEA/AA process.

SEA Scoping Reports are not a formal requirement for the preparation of RPGs. However, section 15(C) of the Planning and Development (SEA) Regulations S.I. 436 refers to *'Scoping of Environmental Report'*. Each Regional Authority prepared Scoping documents to facilitate consultation with the Statutory Environmental Authorities and/or the public prior to the drafting of the SEA Environmental Report and RPGs.[16] Three of the Regional Authorities (GDA, SERA, BRA) issued SEA Scoping documents for public consultation with the RPG Issues Papers. Another three Regional Authorities (MWRA, SWRA, MRA) issued SEA Scoping documents to the Statutory Environmental Authorities for consultation only. One Regional Authority (WRA) prepared a Draft Scoping document for consultation with Elected Members (decision makers) and for a Scoping meeting but it was not issued to the Statutory Environmental Authorities.

For SEA Scoping, three Regional Authorities (SWRA, BRA, SERA) sought to engage directly with other environmental bodies/organisations, and one Regional Authority (BRA) engaged with a wide array of stakeholders in Northern Ireland to further transboundary consultations.

The topics or environmental receptors (biodiversity, human health, cultural heritage, etc.) listed in the SEA Directive were discussed in all (GDA, SERA, MRA, BRA, WRA, MWRA, SWRA) cases, with no topic being eliminated. One Regional Authority (SWRA) included an additional topic at the Scoping Stage but this was amalgamated into another topic in the Environmental Report.

The minimum requirement for Scoping consultation is four weeks, and in six of the cases (GDA (8 weeks), SERA & MRA (9 weeks), BRA (10 weeks), SWRA (10 weeks), WRA (9 weeks), MWRA (unknown)) consultation lasted at least double the minimum time requirement; that is, eight to ten weeks. This 'extended period' coincided with the statutory timeframe for consultation at the pre-draft stage of the RPGs process (that is, a minimum of 8 weeks).

Consultation is considered to have been generally quite extensive for the RPG process, with a wide range of statutory and non-statutory stakeholders and members of the public invited to make submissions. As indicated above, six (GDA, SERA, MRA, BRA, MWRA, WRA) of the Regional Authorities included reference to SEA in their RPG Issues Paper, where submissions on SEA were also invited.

The PDA 2000, as amended requires each Regional Authority to consult with the public and Prescribed Bodies (listed in the PDA Regulations 2001–2011). There were four Statutory Environmental Authorities for the purposes of SEA at the time of the RPG Review (that is EPA, DEHLG, DCENR and NIEA (NI)[17]). Outside of this list there is evidence of at least six (GDA, SERA, MRA, SWRA, BRA, WRA) of the

---

16 A Scoping Issues Paper or initial Scoping document differs from a final Scoping Report in that the latter contains the outcomes of consultation (i.e. integrates relevant issues from submissions received or consultations held). If a Scoping Report has not been prepared, the issues highlighted during the Scoping process may be integrated directly into the Environmental Report for the RPGs.

17 Please refer to Section 5 of this report for more information on SEA Statutory Environmental Authorities.

Regional Authorities seeking to consult with a wider stakeholder list including public representatives, community groups, service providers and the general public. At least two of the Regional Authorities (WRA, BRA) hosted one-day seminars prior to commencement of the RPG Review process.

Six Regional Authorities (GDA, WRA, BRA, MRA, SERA, SWRA) held Scoping workshops/meetings with the EPA. One (MRA) invited the Eastern Regional Fisheries Board to a Scoping workshop. Five Regional Authorities (SERA, WRA, BRA, SWRA, GDA) had meetings with the NPWS[18] on matters relating to the potential impacts on Natura 2000 sites and Appropriate Assessment requirements, and one Regional Authority had both EPA and NPWS present at a Scoping meeting. There was evidence of four (MRA, BRA, WRA, SWRA) authorities seeking to engage other relevant statutory and non-statutory organisations and interest groups, though no SEA/AA Scoping workshops were held in public. Public representatives were consulted at Regional Authority meetings[19] or through RPG Steering Groups,[20] and there was evidence of internal consultation with Local Authorities within the functional area of each Regional Authority (GDA, SERA, WRA, MRA, BRA, SWRA, MWRA).

The total number of submissions received in relation to SEA/AA Scoping ranged between 3 and 12 (GDA = 9; WRA = 11; SERA = 6; MRA = 7; MWRA = unknown, SWRA = 3; BRA = 12); and while these numbers appear to be low, a significant amount of information was contained in the submissions.

Responses from the Statutory Environmental Authorities are as follows. The EPA responded to at least six scoping requests (WRA, GDA, SERA, MRA, BRA, SWRA), DECLG responded in at least four cases (GDA, BRA, SWRA, WRA) and DCENR responded in at least two cases (SERA, BRA). Under the auspices of the DCENR, the GSI responded to two Regional Authority requests (SERA, BRA) and the Eastern Regional Fisheries Board (RFB) (SERA, BRA), Southern RFB (SERA, MRA) and North Western RFB (BRA, WRA) responded to various Regional Authority requests depending on their functional area.

The Department of the Environment (Northern Ireland) (DoENI)/Northern Ireland Planning Service and Northern Ireland Environment Agency (NIEA) responded in two cases (BRA and WRA); however, formal transboundary consultation (in accordance with S.I. 436, 2004) was entered into by only one Regional Authority (BRA) as it has a boundary with Northern Ireland. New DECLG guidance on transboundary consultation was developed as a result of this process between the Border Regional Authority, DECLG and NIEA.

In one case it was found that a submission from the EPA issued to a Regional Authority at the pre-Draft Stage was not documented by a Regional Authority (GDA). Of the Scoping submissions received by the Regional Authorities, the effects of those submissions varied – in one case (GDA) there was no effect, in five cases (SERA, MRA, BRA, SWRA, MWRA) it was unclear where issues were considered, and in at least two Regional Authority Environmental Reports (where they could be identified) submissions had positive effects (WRA, BRA).

18 National Parks and Wildlife Service.
19 Regional Authority meetings are usually held on a monthly basis.
20 RPG Steering Groups vary but usually have County/City Managers, a number of Regional Authority Members (i.e. decision makers) and representatives of the DEHLG/DECLG, representatives of other Government Departments and sectoral interests.

A final Scoping Report containing the submissions received during Scoping was prepared by three Regional Authorities (SERA, MRA, BRA), while the remaining four Regional Authorities (GDA, WRA, BRA, SWRA) incorporated the submissions into the SEA Environmental Report. One Regional Authority (MRA) identified 'issues arising' from Scoping consultations in its final Scoping Report.

There were a variety of Scoping Report formats ranging from a simple format to others that provided much greater detail and an outline of the Environmental Report. Two reports (GDA, SWRA) contained key questions to stimulate consultation.

Following a review of the quality of Scoping Reports, those (GDA, SERA) made available at the pre-Draft Consultation phase were of sufficient quality to allow for meaningful responses from members of the public, statutory bodies or interested groups, etc. The five (MRA, BRA, SWRA, WRA Draft, MWRA Draft) Scoping Reports prepared at later stages would have facilitated consultation with the Statutory Environmental Authorities, Regional Authority Members, etc.

During the investigation into the SEA process, the statutory 'Director's Report on Submissions Received' prepared following each stage of public consultation on the RPGs proved particularly useful. A Director's Report highlights the key issues raised in each submission and how each was considered or addressed by the Regional Authority. Responses to consultation on the Pre-Draft RPGs 'Director's Report' are difficult to address with definite recommendations (other than 'will' or 'will not' be considered in the Environmental Report and the Draft RPGs), as the RPGs and Environmental Report had yet to be prepared. It is much easier to connect those recommendations made in the Director's Report following the second phase of public consultation with sections of the Draft RPGs/Environmental Report.

AA reports did not identify issues that should be considered in the SEA Scoping/Environmental Reports; however, one Regional Authority (MRA) incorporated the strategic environmental objectives identified in the SEA Environmental Report into its AA Report.

AA and SEA were not well integrated from the start of the RPG review process. In four of the case studies (GDA, SERA, BRA, WRA), SEA began first and AA followed, though it is difficult to determine when AA began in three other cases (MRA, SWRA, MWRA).

Table 4 summarises the points above.

Table 4: Summary of Scoping Activities

Scoping/AA Pre-Draft RPGs Activity	BRA	WRA	GDA	MRA	MWRA	SERA	SWRA
Reports							
Scoping Report prepared for consultation?	1	2	1	2	2	1	2
Final Scoping Report prepared?	Yes	No	No	Yes	No	Yes	No
All SEA Directive Topics used?	Yes	Yes	Yes	Yes	Yes	Yes	Yes
RPG Issues Paper includes reference to SEA?	Yes	Yes	Yes	Yes	Yes	Yes	No
Consultation							
Transboundary Consultation conducted?	Yes	No	No	No	No	No	No
Engaged with other environmental bodies/organisations for Scoping?	Yes	No	Yes	Yes	Yes	Yes	Yes
Consultation on Pre-Draft RPGs with wider group than just the Prescribed Bodies?	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Scoping Workshops/Meetings held with EPA?	Yes	Yes	Yes	Yes	No	Yes	Yes
AA Meetings with NPWS?	Yes	Yes	Yes	No	No	Yes	Yes
Internal Scoping/AA Consultation with Local Authorities in Region?	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Responses received by RAs from: ▪ EPA?	Yes	Yes	Yes	Yes	No	Yes	Yes
▪ DEHLG?	Yes	Yes	Yes	Yes	No	Yes	Yes
▪ DCENR (GSI/RFB)?	Yes	Yes	No	Yes	No	Yes	No
▪ NIEA/DoENI?	3	No	No	No	No	No	No
Consultation & ER							
Submissions included in the ER?	Yes	Yes	Yes	No	No	No	Yes
Effect of Submissions on Environmental Report?	Clear	Clear	Unclear	Unclear	Unclear	Unclear	Unclear

	Legend:	Yes	No
		Clear	Unclear

1 Scoping documents for Elected Members, Public Consultation & Statutory Environmental Authorities; **2** Scoping documents for Elected Members and all/some Statutory Environmental Authorities; **3** Formal Transboundary consultation.

Please note that the above information is based on available reports and, where possible, additional information provided by Regional Authorities. The criteria listed in the summary table above are based on the Case Study Questions listed in Appendix 3.

2. Consultation on Draft RPGs and Environmental Report

Consultation is a key aspect of both SEA legislation and the Planning and Development Act 2000, as amended. The SEA process and reports complement the RPG process. It is essential that the Environmental Report influence the formative stage of RPGs so that environmental issues are taken into account. This is why consultation prior to draft of the RPGs and later on at draft RPG stage is particularly important.

Each Regional Authority is required to publish notification of the RPGs review stages in at least one regional newspaper (that is at pre-draft, draft RPGs and at the making of the RPGs). Each Regional Authority made use of its website, with at least one Regional Authority (WRA) providing links on Local Authority websites its region and making use of social media websites. One Regional Authority (GDA) wrote to all Members of the Houses of the Oireachtas (based in the Regional Authority area) and a wide range of community organisations. At least four Regional Authorities (BRA, WRA, SERA, GDA) held meetings with Local Authority 'Special Policy Committees', County Development Boards (CDBs), service providers, etc. Regional Authorities are also required to consult adjoining Regional Authorities as they are 'Prescribed Bodies' in planning legislation. One Regional Authority (BRA) conducted formal transboundary consultations with Northern Ireland (NI), where the NIEA[21] invited public consultation on the proposed RPGs. Any submissions received were then provided to the Regional Authority.

The minimum amount of time for an Environmental Report to be available for public consultation is four weeks, and the SEA Environmental Reports were made available for 10–11 weeks as this coincided with the statutory 10 weeks public display period for the Draft RPGs (WRA (10 weeks), GDA (11 weeks), SERA (11 weeks), BRA (10–11 weeks), MWRA (11 weeks), SWRA (10 weeks), MRA (10 weeks)) as set out in the Planning and Development Act 2000, as amended.

The total number of submissions received by a Regional Authority on the Draft RPGs and Environmental Report ranged between 36 and 87, with the highest number being received by a joint Regional Authority area (WRA (48 with 10 on SEA), GDA (87 with 6 on SEA), SERA (36 with 4 on SEA), BRA (43 with 4 on SEA), MWRA (41 with 2 on SEA), SWRA (38 with 4 on SEA) and MRA (43 with 5 on SEA)). The total number of submissions received on SEA (though some also referred to AA/RFRA) ranged between two and 10. The Statutory Environmental Authorities provided the bulk of the information submitted.

As previously indicated, a Director's Report must be prepared at each stage in the RPG review process. This is particularly useful as each submission must be considered and accounted for by the Regional Authority, ensuring transparency in the process. Although the types of report vary, the Regional Authority is required *inter alia* to list submissions received and any persons or bodies consulted by the Regional Authority, summarise the issues raised, give the opinion of the Director on the issues raised and make recommendations on policies to be included in the Draft RPGs. Five Directors' Reports examined submissions individually and provided a synopsis of key issues and an indication of whether they were appropriate for inclusion in the RPGs/SEA, etc. Two Regional Authorities (GDA, MRA) grouped the submissions by topic and in these situations it was not as easy to determine the outcome of individual submissions.

---

21 Please refer to Section 5 for more information.

The Directors' Reports showed that consultation was undertaken in a meaningful way and responses were taken seriously and addressed appropriately. A wide variety of alterations were made to the RPGs as a result of issues raised and the author considers that the formal process allowed this to occur. The process benefited from consultation by making the RPGs more robust, particularly in relation to environmental considerations.

Table 5: Summary of Consultation on Draft RPGs and Environmental Report

Consultation	BRA	WRA	GDA	MRA	MWRA	SERA	SWRA
Total Submission Received (Total Submissions on SEA)	43 (4)	48 (10)	87 (6)	43 (5)	41 (2)	36 (4)	38 (4)
Weeks for which Environmental Report was available, and was this in excess of minimum requirements?	10–11	10	11	10	11	11	10
Meaningful consultation?							
					Legend:	Yes	No

Please note that the above information is based on available reports and, where possible, additional information provided by Regional Authorities. The criteria listed in the summary table above are based on the Case Study Questions listed in Appendix 3.

3. Description of RPGs and Review of Other Plans/Programmes

The Environmental Report should outline the contents of the Draft RPGs, its main objectives and its relationship with other relevant plans and programmes.

The RPG Environmental Reports generally provide an outline of the contents and the main objectives of the RPGs. As formats of the Draft RPG differed, 'main objectives' are infrequently referred to. Instead the key vision, aims, goals, policies or objectives are outlined.

The level of detail on the relationship of the RPGs to other plans or programmes ranges from limited references to immediate documents such as the National Spatial Strategy 2002 to an extensive list of European, international and national plans, policies and programmes which influence the RPGs and references to plans or programmes that the RPGs will directly influence (such as Development Plans and Local Area Plans).

Two Regional Authorities (MWRA, MRA) provided information on a limited number of plans and programmes while the remaining five (GDA, BRA, SWRA, WRA, SERA) provided greater detail on a wide range of plans and programmes. In particular, one Regional Authority (GDA) used a very useful circular diagram (see Figure 8) to illustrate the relationships between plans and programmes at international/European level to local level. This was categorised by environmental receptor (that is, biodiversity, water, flora, fauna, etc.).

Each Regional Authority included reference to strategic objectives, aims or the purpose of plans and programmes that were relevant to the RPGs.

Conflicts or synergies between the RPGs and the objectives of these plans and programmes should be clearly defined. They were identified in three Regional Authority Environmental Reports (GDA, MWRA, MRA).

Figure 8: Relationships between Plans and Programmes[22]
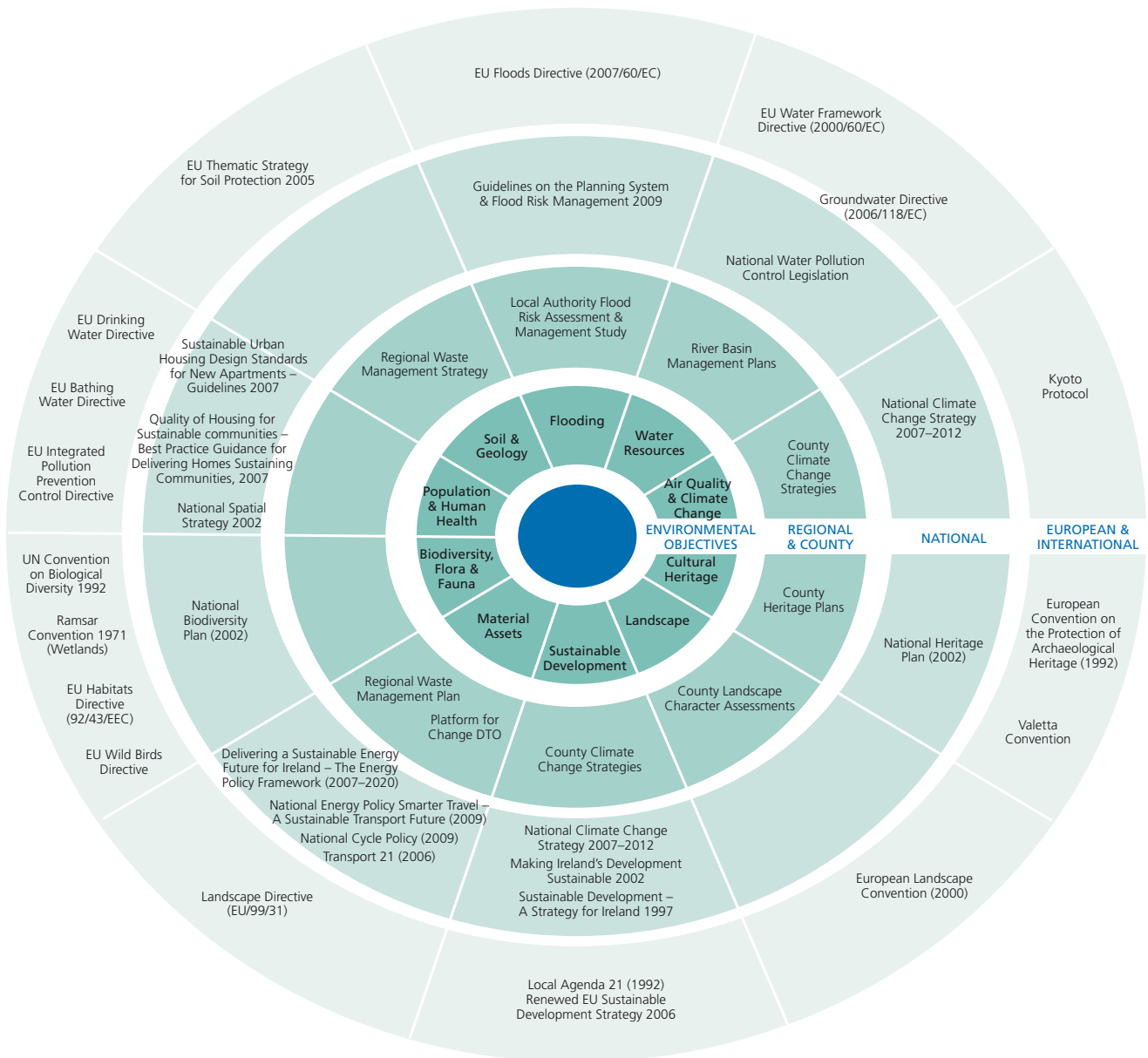
22 Source: Dublin & Mid-East Regional Authority/Arup Consulting Engineers (January, 2010) *SEA Environmental Report for the Review of the Regional Planning Guidelines for the Greater Dublin Area*. www.rpg.ie (Accessed on 04/04/2011).

Table 6: Summary of RPG Description

RPG Description	BRA	WRA	GDA	MRA	MWRA	SERA	SWRA
Main Objectives of the RPGs included?	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Good detail on range of plans and programmes?	Yes	Yes	Yes	No	Yes	Yes	Yes
Conflicts/synergies between RPGs and other plans/programmes identified?	No	No	Yes	Yes	Yes	No	No
Legend:						Yes	No

Please note that the above information is based on available reports and, where possible, additional information provided by Regional Authorities. The criteria listed in the summary table above are based on the Case Study Questions listed in Appendix 3.

4. Existing (Baseline) Environment

S.I. 436 sets out the relevant aspects of the current state of the environment (that is, how the region is performing) that should be explored in Environmental Reports. The likely significant effects of implementing the RPGs can be identified from and assessed against this baseline.

All Environmental Reports provided a description of the environmental receptors (biodiversity, population, human health, fauna, flora, water, soil, air quality, climatic factors, material assets, cultural heritage and landscape) that are contained in the S.I. 436 (2004). Given the strategic level of the RPGs and the potential impact of implementation of the RPGs on the full range of receptors, no Environmental Report scoped any of these factors out. However one Regional Authority (MRA) omitted 'Climatic Factors' (previously 'scoped in') from its Environmental Report, although the reasons for its exclusion were not stated. 'Flooding' and 'Coastal and Marine Environment' were included as an additional topic in two (GDA, SWRA) Environmental Reports, although they were addressed under different headings (e.g. water) in their Environmental Reports. Another Regional Authority (BRA) provided a useful table in its baseline section identifying the environmental receptors/topics that were 'scoped in' and the 'environmental impacts which needed to be considered'.

The Environmental Reports identified existing environmental pressures or problems and placed them in the context of the RPGs. Some Regional Authorities included details on a wide variety of environmental pressures.

A wide variety of issues are explored in the Environmental Reports, with many overlapping. There are common environmental pressures occurring in the regions (please refer to Table 7), although certain pressures are more or less prevalent or intensified in some regions.

Table 7: Common Environmental Pressures in the Regions

Biodiversity, Flora and Fauna	The most frequently referenced issues include the poor conservation status of Natura 2000 sites and loss of biodiversity within those sites; the cumulative effects of development on designated and non-designated sites, particularly as a result of urban expansion; the impact of water pollution and changes in the hydrological regime on water-dependent habitats, with potential loss of Salmonid species and extirpation or extinction of the freshwater pearl mussel (*Margaritifera margaritifera*). The impact of invasive species on native species and habitats is also a significant problem in the regions.
Population and Human Health	The need for delivery of physical and social infrastructure in tandem is a key issue for population and human health. Other issues included the impacts of poor water quality (drinking water in particular) on human health; the impact of unsustainable travel and commuting on quality of life; the impacts of road safety/accidents and emissions to air on population and human health; and impacts from changes to the built and natural environment, radon, noise, flooding and light pollution on population and human health.
Landscape	Frequently occurring issues across the Regions relate to impacts of extractive industry, the cumulative visual impacts of large infrastructural developments, rural housing and other developments in sensitive landscapes and the impacts of forestry and coastal erosion on landscapes.
Soil	Pressures relate to degradation of soil, soil erosion, the sealing-off of soils, the impacts of flooding and urbanisation on soils; and the impacts of extractive industry, peat cutting, forestry and coastal erosion on soils.
Water	The prominent issues are the potential failure to meet the objectives of the Water Framework Directive, EU Urban Waste Water Treatment Directive and EU Bathing Water Standards, a lack of physical (water and wastewater) infrastructure (including poor domestic wastewater treatment); the impact of poor drinking water and groundwater pollution on human health; impacts of water abstraction and physical modification of water courses; and the impacts of agriculture, forestry on water quality and water-dependent habitats and species.
Cultural Heritage	The key pressures include the negative impacts from development activities on Protected Structures (including material alteration), Architectural Conservation Areas or townscapes; development activities causing damage to archaeology (including negative impacts on the visual amenity of archaeological sites or physical destruction of undiscovered archaeology); and the insensitive development of brownfield sites in urban areas.
Air and Climate	Key problems included the overarching impacts of climate change on the Regions and its impact on all environmental receptors (e.g. water supply issues associated with low flow periods and the knock-on impact on habitats and species), travel-related greenhouse gas (GHG) emissions to air and the challenges to reduce these emissions in an increasingly car-dependent society with sprawling urban development. Flooding impacts (as a result of climate change) on all other environmental receptors were identified as a significant issue.
Material Assets	The pressures identified in the Environmental Report baselines under this topic vary widely; however, one of the most common issues is that residential and industrial developments have exerted significant pressure on all existing material assets (i.e. infrastructure such as wastewater) and there is a significant negative impact where the ability to accommodate future population growth is being exceeded.

Please note that the above information is based on available reports.

All (BRA, MRA, GDA, SERA, WRA, MWRA, SWRA) Regional Authorities explore the *'likely evolution of the existing environment without implementation of the RPGs'*, though it is not clearly identified as such in one (SWRA) Environmental Report. This Environmental Report *inter alia* states that the impacts of the RPGs can be estimated as the difference in the environmental conditions with or without implementation of the RPGs.[23] Two case studies (MRA, WRA) describe the ('likely evolution…') section under each environmental topic (biodiversity, water, air, etc.) in the environmental baseline section, while four (BRA, GDA, SERA, MWRA) include this in a separate section of the Environmental Report. Two case studies (GDA, SERA) also identify this section as also being the 'do-nothing' option. It is clear that the description of the *'likely evolution…'* could be improved.

Five Regional Authorities (SWRA, MWRA, WRA, GDA, BRA) outlined 'significant gaps' in their baseline data. Key baseline data gaps include the lack of comprehensive flood risk mapping, lack of information compiled by relevant agencies (e.g. heritage plans, biodiversity plans, landscape characterisation plans), lack of habitats surveys for non-designated sites or insufficient baseline data on habitats, lack of wetland inventories, an absence of turlough mapping, limited air quality data, an absence of data on brownfield sites, no guidance on how to maintain or conserve soil quality, insufficient data on wastewater treatment plant performance and inconsistencies in landscape designations.

Key difficulties identified in compiling the required information included the availability of relevant, up-to-date data, the lack of digitised/GIS data in readily usable formats, no centralised or regional Geographical Information Systems (GIS) environmental database and a lack of available spatial data for human health.

One Regional Authority (BRA) identified its difficulty in determining the 'level of detail' to be explored in a regional Environmental Report and how to identify matters that might be more appropriately dealt with by a lower level plan. Another Regional Authority (MWRA) identified its difficulty in assessing how some (RPG) strategic or indicative policies would impact on designated sites, and as a consequence caveats were included in the RPGs to ensure that AA would be undertaken at project level wherever necessary.

In terms of GIS, one Regional Authority (GDA) indicated that its mapping and modelling were based on obtainable spatial data and certain information was not available for incorporation into a GIS database, was not consistent or was not up to date for the region. Therefore outcomes were based on the quality and quantity of the inputs. While five of the Regional Authorities (BRA, GDA, SERA, SWRA, WRA) did not identify a way of overcoming their difficulties, one Regional Authority (MRA) indicated that it invested time in collecting spatial data for the Environmental Report.

---

23 This statement is also found in the DEHLG SEA Guidelines (2004).

The application and use of mapping varied across the case studies. Maps are a very useful way to give a spatial dimension to data contained in the text of the Environmental Report. While there is no legislative requirement for mapping, Section 4.16 of the DECLG SEA Regulations (2004) acknowledges its benefit. Some Environmental Reports used extensive mapping while others made little use of the medium. Three Regional Authorities (MRA, GDA, SWRA) used mapping effectively to illustrate single data sets (e.g. all settlements in the region) and combined data sets (composite map of all environmental sensitivities). In particular, composite maps were well exploited to inform cumulative assessments and the assessment of Alternatives, but were limited to using only readily available GIS data.

Two Regional Authorities (GDA, SWRA) used mapping models that were complex and may be difficult for most readers to understand fully. One Regional Authority (GDA) posed a number of questions for its model to address. They focused on the likely location of future development, the kind of development it will be and its likely impact on the environment. It also sought to identify the areas of the region that are more sensitive than others and how they would be affected by RPG implementation. Finally it examined where development-related environmental pressures would have a potential negative impact on water and air and sustain car-dependent land use patterns.

In order for maps to add value to the text of the Environmental Report they must be of sufficient scale; that is, they must be legible. At least four of the case studies contained some maps that were simply too small (e.g. Alternatives sections in GDA and SWRA).

The most readily available, useful and consistent datasets are those that were prepared as part of the River Basin Management Plans (RBMPs) to comply with the objectives of the Water Framework Directive. They are particularly effective and illustrate the baseline environment and the potential impacts on water quality. Other datasets from the EPA, NPWS, GSI, CSO and Local Authorities also proved particularly useful (e.g. Corine LandCover, Natura 2000 Sites and NHAs, Geology, Soils and Groundwater Vulnerability mapping, Travel to Work POWCAR Data and Cultural Heritage sites).

Bibliographies were absent from five of the Regional Authorities' (SWRA, SERA, BRA, MWRA, MRA) Environmental Reports. At least four of the Environmental Report baselines sections (SWRA, WRA, GDA, BRA) appeared to have been informed by a much wider range of references than the remainder. Key sources of information were EPA Reports, RBMPs and RBMP GIS.

In all cases, it is considered that baseline data was relevant to the RPGs (though not always concise).

Table 8: Summary of Existing Environment

Existing Environment	BRA	WRA	GDA	MRA	MWRA	SERA	SWRA
All SEA topics (identified at Scoping) included?					No		
Environmental pressures placed in context of RPGs?							
Likely evolution of the environment in the absence of RPGs explored?							
Significant gaps in baseline data identified?				1		1	
Use of composite 'sensitivity-type' mapping?	No	No			No		
Mapping used to inform cumulative assessment & Alternatives?	No	No			No		
Relevant baseline data used?							
Legend:						Yes	No

1 Regional Authority noted that either there were no significant gaps in its baseline or it invested time in overcoming lack of data.

Please note that the above information is based on available reports and, where possible, additional information provided by Regional Authorities. The criteria listed in the summary table above are based on the Case Study Questions listed in Appendix 3.

5. Objectives, Targets and Indicators

Monitoring of the Environmental Report can be conducted through the use of objectives, targets and indicators (as outlined in Figure 9). All Environmental Reports prepared with the Draft RPGs contain these.

Figure 9: Objective, Target and Indicator

OBJECTIVE A desired direction of change	→	**TARGET** Focussed result	→	**INDICATOR** A measure of progress towards a target

Environmental objectives should be directly linked to appropriate and measurable targets and indicators, and follow a logical order. In all cases it is considered that there are clear links between the three. However, there are a number of anomalies. In the case of one Regional Authority (SWRA) there are some targets without indicators. Two Regional Authorities (WRA, MRA) propose environmental objectives which are linked to monitoring though they do not address the significant environmental effects identified. One Regional Authority (BRA) has an objective with no target associated with it and another (GDA) Environmental Report suggests that proposed 'indicators' are suggestive and are for discussion purposes only.

Indicators are generally not tailored to areas over which the Regional Authority has remit. Regional Authorities are predominantly dependent on information/data that is collected at Local Authority level through their statutory functions (e.g. water quality) and they are also dependent on data collected by other bodies and organisations such as the EPA and NPWS.

Monitoring data will be reasonably easy to collect, although each Regional Authority may have difficulty in acquiring data on a minor number of indicators or targets proposed. In some instances, 'indicators' and 'targets' information is not readily available or may require new procedures to be established at state agency level or at Local Authority level to enable its collection. An example of a target is 'to maintain the quality of soils' (SWRA, BRA). While a National Soils Database has been developed by the EPA, National University of Ireland, Galway and Teagasc, a national soil quality monitoring network has not been developed[24] and this would be outside the Regional Authority's current remit. Other potential monitoring at Local Authority level could be difficult to achieve with limited budgets and if there is not an existing statutory (Local Authority) function.

The number of indicators and targets varied between Environmental Reports. In at least five cases, the collection of data for reporting on the 'Implementation of the RPGs' will be manageable in terms of time and resources, although each Regional Authority must allocate sufficient time for its collection. The number of indicators used varied from 18 to 84 (SWRA (45), WRA (84), BRA (30), SERA (28), MWRA (38), MRA (18), GDA (62)) and the number of targets proposed varied from 0 to 77 (SWRA (35), WRA (77), BRA (25), SERA (28), MWRA (38), MRA (18), GDA (0)). Clearly a disparity exists. In the case of two (WRA, GDA) Regional Authorities, there is evidence to suggest that it may be too difficult to gather frequent results to monitor specific targets.[25]

In six cases (WRA, SWRA, BRA, SERA, MWRA, MRA), RPG monitoring and SEA monitoring proposals are separate. Despite this, there is usually some overlap, though SEA monitoring would not necessarily examine economic impacts etc. One Regional Authority (GDA) has proposed a joint RPG/SEA monitoring programme (though in the final Environmental Report this is based on indicators only).

Monitoring needs additional consideration. Regional Authorities have not conducted further detailed analysis of what the outcomes of monitoring through the targets and indicators will be (that is, how useful they will be). There is little reference to the possible removal or substitution of unsuitable targets and indicators that are discovered during monitoring. Indicators should be broken down into short-, medium- and long-term categories, and prioritised.

Thresholds should be included to identify where remedial action will be required. For example, limits or thresholds have been established in two cases (WRA, MWRA), although the usefulness of these particular thresholds requires further analysis. Timescales for achieving targets have been set in two cases (SERA, MWRA), although again, these could be re-evaluated or strengthened.

---

24 Refer to EPA (2002) *Developing A Soil Protection Strategy for Ireland – A Discussion Document*. www.epa.ie/downloads/pubs/land/EPA_soil_discussion.pdf (Accessed on 30/06/2012).

25 One Regional Authority (GDA) removed all targets in the final iteration of its documents, although no explanation for this action was provided.

Sources of information or details of the authorities/bodies responsible for monitoring should be specified and consideration should be given to the format/presentation of results (for example, as found in the WRA Draft SEA Statement).

Table 9: Summary of Objectives, Indicators and Targets

Objectives, Indicators & Targets (O, T, I)	BRA	WRA	GDA	MRA	MWRA	SERA	SWRA
O, T, Is proposed in Draft ER?							
Os linked to appropriate targets and indicators?	1	2	3	2			4
Majority of indicators within the remit of the Regional Authority?							
Manageable number of indicators proposed?							
RPG & SEA Monitoring combined?							
Were indicators prioritised or timescales defined?							
Thresholds included (for remedial action)?							
Expected timescale to achieve target?							
Legend:						Yes	No

1 Objective without target; **2** Some additional objectives that are not linked to likely significant effects; **3** Indicative indicators only; **4** Targets without indicators.

Please note that the above information is based on available reports and, where possible, additional information provided by Regional Authorities. The criteria listed in the summary table above are based on the Case Study Questions listed in Appendix 3.

6. Alternatives

Article 5 of the SEA Directive requires Environmental Reports to contain 'reasonable alternatives' which will (in the case of the RPGs) take into account the RPG objectives, the geographical scope of the RPGs and the significant environmental effects of the alternatives selected. Strategic options must be considered at a regional level but must also acknowledge that they are framed within a planning policy hierarchy. It must be possible to implement the alternatives, so they must be realistic.

Figure 10: Alternatives considered in the Regional Planning Guidelines SEA Environmental Reports

BRA	■ Continuation of current trends ■ Predominantly gateway-led development model ■ Balanced development model
SWRA	■ Continuation of current trends ■ High urban growth ■ Moderate urban growth
WRA	■ Concentration of growth in the gateway only ■ Dispersal of developments ■ Concentration of growth in all urban areas and settlements ■ Development of the gateway, hub and linked hub supported by the development of key towns; encouraging the development of other settlement centres and appropriate development in the rural areas of the region
SERA	■ Building up the gateway only ■ Building up the extended gateway, hubs and county towns
GDA	■ Baseline/continued trends approach ■ Finger expansion of metropolitan footprint ■ Consolidation of key town & the city ■ Consolidation and sustainability and some expansion at nodes on transport corridors
MRA	■ Exclusively gateway focused development ■ Balanced development of the gateway and its wider region ■ Continuation of historical trends
MWRA	■ Concentration of growth in the core of the region, with overspill benefit to the surrounding areas ■ Dispersal of development to all parts of the region with investment scattered in small discrete pockets ■ Development of a strong core area, complemented by other key regional towns; encouragement of development in other centres and in the rural areas of the region

Figure 10 outlines some of the similarities in the types of alternatives considered in the RPGs.

The Environmental Reports all explored somewhat reasonable alternatives. The alternatives were generally discussed in terms of their features and consequences or impacts. In six cases (SWRA, WRA, BRA, SERA, MWRA, MRA), Regional Authorities included options that were not likely to be followed or chosen; that is, there was a predisposition towards one or more particular alternatives. At least one Regional Authority (WRA) indicated that while another alternative scenario was preferable, limited infrastructure restricted the choice of options.

Three Regional Authorities (SWRA, GDA, MRA) made use of GIS and mapping in the consideration of alternatives. Mapping enhanced this section of the Environmental Report (where it was used), as it illustrated issues discussed in the text and outlined why decisions were taken.

The number of alternatives considered in each Environmental Report ranged from two to four (SWRA (3), WRA (4), BRA (3), SERA (2), MWRA (3), MRA (3), GDA (4)) (refer to Figure 10). Four Regional Authorities (WRA, BRA, MRA, GDA) describe how the alternatives were developed. Two Regional Authorities' (WRA, MWRA) alternatives originated in the RPGs and were developed from alternatives in previous RPGs (2004). Written justification for the chosen alternative was provided in six Environmental Reports, with one (MWRA) including the justification in the final iteration of the Environmental Report (that is not at draft RPG stage).

At least four of the Regional Authorities (SWRA, WRA, BRA, MRA) noted that the potential environmental impacts associated with the proposed alternatives were mitigated through policies and objectives incorporated into the RPGs. One (WRA) Environmental Report indicated that mitigation set out in the RPG SEA Environmental Report and AA Reports should be incorporated into lower level Development Plans in the region.

The preferred alternatives provide the basis for the Regional Settlement Strategies/Strategic Vision in the RPGs which must be in accordance with the National Spatial Strategy. Two Environmental Reports (WRA, BRA) referred to the framing of RPG Alternatives within the context of the National Spatial Strategy; that is, that the documents must be consistent with each other. Six Regional Authorities (GDA, WRA, BRA, SERA, SWRA, MRA) assessed their alternatives against the environmental protection objectives developed in the Environmental Report. A discussion on this assessment was provided in some Environmental Reports. One Regional Authority (SWRA) assessed the alternatives against indicators based on various environmental receptors/environmental objectives.

In two cases (GDA, SWRA) there is evidence of other alternatives being considered as a result of SEA. One of these Regional Authorities (GDA) eliminated scenarios as a result of the SEA Environmental Report.

The 'do-nothing/business as usual' option was briefly considered in one (BRA) Environmental Report, but was then dismissed. It was also referred to in another Environmental Report (MRA) but was not considered.

Alternatives & Appropriate Assessment

AA Reports (Stage 1 AA Screening or Stage 2 AA) did not show that any of the RPGs would have a significant effect on the integrity of Natura 2000 sites.

With the exception of one Regional Authority (MRA), Appropriate Assessment did not play a role in the inception and/or development of alternatives. In one case (GDA) alternatives generated for SEA purposes were used to inform the AA and while the potential impacts of the scenarios on Natura 2000 sites etc. were discussed in the AA, no other alternatives were subsequently proposed in the AA to try to avoid these impacts.

Table 10: Summary of Alternatives

Alternatives	BRA	WRA	GDA	MRA	MWRA	SERA	SWRA
Somewhat reasonable Alternatives?	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Pre-disposition towards particularly alternatives?	Yes	Yes	No	Yes	Yes	Yes	Yes
Use of GIS in considering Alternatives?	No	Yes	Yes	Yes	No	No	Yes
Description of how the Alternatives were developed?	Yes	Yes	Yes	Yes	No	Yes	No
Did Alternatives originate in the SEA?	Yes	No	Yes	Yes	No	Yes	No
Justification given for the chosen Alternative?	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Were Alternatives incorporated into the RPGs?	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Reference to the framing of Alternatives within the hierarchy of planning policies (i.e. limitations)	Yes	Yes	No	No	No	No	No
Alternatives assessed against Environmental Objectives?	Yes	Yes	Yes	Yes	No	Yes	Yes
Do-nothing Scenario utilised?	No	No	No	No	No	No	No
Did AA play a role in inception or development of SEA Alternatives?	No	No	No	Yes	No	No	No

Legend: **Yes** (green) **No** (yellow)

Please note that the above information is based on available reports and, where possible, additional information provided by Regional Authorities. The criteria listed in the summary table above are based on the Case Study Questions listed in Appendix 3.

7. Likely Significant Effects of the Regional Planning Guidelines on the Environment

A description of the likely significant effects on the environment must be included in an Environmental Report. The effects should be described by environmental topic/receptor; that is, biodiversity, flora, fauna, population, human health, soil, water, air/climatic factors, material assets, cultural heritage and landscape. The full range of effects within each topic must be described; that is, positive, negative, short, medium or long term, permanent and temporary, secondary, cumulative and synergistic.

Analysis of the case studies reveals generally poor descriptions of the full range of likely significant effects on the environment as outlined in S.I. 436. Table 11 provides an overview of Environmental Reports where some effects are not referenced. Negative effects were referenced by all Regional Authorities with almost all referring to positive short- and long-term effects. However, there was a distinct lack of referencing of medium, permanent, temporary, secondary, cumulative and synergistic effects.

Table 11: Environmental Reports and the Types of 'Likely Significant Effects' Omitted

Type of Effects	BRA	WRA	GDA[1]	MRA	MWRA	SERA[1]	SWRA
Positive							•
Negative							
Short Term						•	
Medium Term	•					•	
Long Term						•	
Permanent	•	•		•	•	•	•
Temporary	•	•			•	•	•
Secondary	•			•	•	•	•
Cumulative				•	•		
Synergistic	•		•	•	•	•	•

Legend:	• Type of Effect Omitted
	Type of Effect Included

1 Regional Authority identified environmental pressures but did not specifically identify 'likely significant effects' on the environment. Please note that the above information is based on available reports.

The explanation of 'interrelationships between the likely significant effects on the environment' could be improved. Interrelationships are discussed in the environmental baselines in at least six Environmental Reports (WRA, SWRA, BRA, MRA, SERA, SWRA), although they are not clearly identified as such. Two of the Regional Authorities (SWRA, MRA) failed to describe them under the heading, and one Regional Authority (MWRA) failed to describe them at all. Three Environmental Reports (WRA and BRA with no explanation, SERA with some explanation) use a 'tick-box' table to show the linkages. One Regional Authority's (GDA) Environmental Report contains a table that shows direct or indirect interactions between the 'likely significant effects' and provides a discussion on these interactions.

In order to determine the 'likely significant effects' or potential environmental effects of Draft RPG goals, policies, objectives, etc. on the Environmental Objectives, all Regional Authorities employed the use of a matrix assessment.

The length of the matrix assessments varied, with one example (WRA) being especially long and one (SWRA) being very short. A long matrix is discouraging to read. In two cases (WRA, MRA), for example, details on the 'types of effects' were included in a column in the matrix, while in another (SWRA) the matrix was very concise but lacked sufficient detail for the reader. The total number of goals, policies and objectives in the Draft RPGs documents also influenced the length of the matrix assessment; that is, some had but a few while others contained hundreds. Presentation of the matrix assessment should be simple and convey a message quickly; one report, for example (GDA), used block colouring in its matrix table, which was particularly effective. A summary of the overall matrix assessment should be included in the Environmental Report section on 'Likely Significant Effects' with a discussion of same.

Clear descriptions of how impacts were predicted were not provided in any of the Environmental Reports.

Likely significant effects were not identified in two Environmental Reports (SERA, GDA), although environmental problems/pressures were discussed and alterations were made to the RPG documents. One of the five remaining Regional Authorities (SWRA) referred to 'environmental pressures' and it is assumed that these are the 'likely significant effects on the environment', though it is not clearly distinguished.

The changes proposed in other Environmental Reports (as a result of likely significant effects or environmental pressures) ranged from unclear (SWRA) to minor (GDA) and moderate (BRA, MRA) to major (WRA, MWRA). A rough outline of the changes made to the RPGs as a result of this process is contained in Table 12. The changes that occurred are generally considered to be commensurate with the impacts that the RPGs were predicted to have, though this was not always easy to gauge and in two reports (SERA, SWRA) it was unclear.

Table 12: Number of New Goals/Policies/Objectives or Other Additions/Deletions to the Draft RPGs or Final RPGs as a Result of the SEA/AA Processes*

	BRA		WRA		GDA		MRA		MWRA		SERA		SWRA	
	Draft	Final	Draft	Final	Draft	Final	Draft	Final	Draft	Final	Draft	Final	Draft	Final
Goals	3	0												
Policies	77	0		2	13		24	unclear	0	0	0	unclear		
Objectives	59	0		7				unclear			0	unclear		
Amendment to Objective/Policy						4				1			23	
Caveats on Goals			6	7										
Caveats on Objectives			31	46	60				89	77#	21	21		4
Caveats on Policies			19	37			3							
Caveat on Priority Action							1							
Deletion of Policy/Objective													1	
Text Added		yes		yes										

* Based on Environmental Reports and RPG documents available to the author.

Based on 31 caveats.

The criteria listed in the summary table above are based on the Case Study Questions listed in Appendix 3.

A range of goals, policies and objectives were incorporated into the RPGs as a result of the SEA process at both the draft RPG stage and the final RPG stage. The Regional Authority approaches were somewhat different to each other, as Table 12 illustrates. Six of the Regional Authorities (WRA, SWRA, SERA, GDA, MRA, MWRA) used caveats that identified the need for further environmental assessment (e.g. AA, EIA) during the preparation of lower level land use plans and at project level. In at least four cases (WRA, MRA, SERA, GDA), additional text proposed in AA Reports was included in the RPGs.

DEHLG Guidance on AA was published when the RPGs were in draft form and already available for public consultation. Further consideration by the Regional Authorities of the implications of AA on the RPGs at this stage, may have resulted in a higher than usual number of alterations to the RPGs before they were adopted.

All Environmental Reports referred to new goals, policies, objectives or amendments to goals, policies and objectives in the Draft RPGs as result of SEA. However, it should be noted that the RPG documents contained many environmentally sustainable goals, policies or objectives, etc. While they were identified as such in the Matrix Assessment, they may not have been captured in the main Environmental Report (for example by way of a summary table).

Table 13: Summary of Likely Significant Effects

Likely Significant Effects	BRA	WRA	GDA	MRA	MWRA	SERA	SWRA
Full Range of Effects Discussed?	No	No	No	No	No	No	No
Interrelationships between likely significant effects discussed?	Yes	Yes	Yes	Yes	No	Yes	Yes
Use of Matrix Assessment Technique?	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Discussion on how impacts (in Matrix) were predicted?	No	No	No	No	No	No	Yes
Likely 'Significant' Effects identified?	Yes	Yes	No	Yes	Yes	No	Yes
Alterations to RPGs commensurate with predicated environmental impacts?	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Use of Caveat Conditions to mitigate?	No	Yes	Yes	Yes	Yes	Yes	Yes
Additional text from AA included in RPGs?	No	Yes	Yes	Yes	No	Yes	No

Legend:	Yes	No

Please note that the above information is based on available reports and, where possible, additional information provided by Regional Authorities. The criteria listed in the summary table above are based on the Case Study Questions listed in Appendix 3.

8. Mitigation Measures

Mitigation measures are found in all Environmental Reports. Their purpose is to prevent, reduce and as fully as possible offset any significant adverse environmental effects of implementing the RPGs (refer to S.I. 436 (2004)).

As previously indicated, likely significant effects were identified in five of the Environmental Reports (excluding GDA, SERA). Essentially mitigation has been proposed in two ways – the first way, which was used by all Regional Authorities, is by amending RPG goals/policies or objectives in the SEA Matrix Assessment (that is, where the environmental protection objectives and RPG Policies are compared); the second way is by directly incorporating mitigation measures into the Draft RPGs in response to 'likely significant effects' identified in the baseline environment section of the Environmental Report (GDA, MRA, BRA). Two Regional Authorities (WRA, SWRA) mitigate using the matrix assessment approach only. Mitigation generally consists of alterations to policies/objectives, new policies, deletions or caveat conditions (refer to Table 12).

Mitigation outlined in AA reports (in various formats – e.g. caveat conditions, altered policies/objectives or additional text) has been incorporated into all of the RPGs.

In one case (GDA) a list of mitigation measures proposed in the Environmental Report was not incorporated into the Draft RPGs, but in all other cases mitigation was integrated into the Draft RPGs. Generally it's easy to identify where these have been placed, with the exception of one case (SWRA).

Mitigation measures should be directly linked to 'likely significant environmental effects' and monitoring proposals. There are a number of shortfalls in this area. In one case (BRA) a mitigation measure was linked to a significant effect but was not linked to monitoring; additional environmental pressures (though not 'significant effects') were identified but were not linked to mitigation. In one example (SERA) when an Environmental Report did not identify 'likely significant effects' on the environment, 'uncertainties' were identified, as the likely effects were unclear and/or could not be judged. These uncertainties were not linked to the monitoring proposed in the Environmental Report. Another case study (GDA) contains mitigation measures that are not linked to environmental pressures described or monitoring proposals.

Mitigation measures identified lie primarily within the remit of the Local Authority, EPA, NPWS, etc. and will be implemented through the normal statutory functions of these authorities. However, the authority that is responsible for mitigation measures is not often identified, although it is usually easy to assume its identity. While the Regional Authorities will be reliant on Local Authorities and other bodies, no follow-up is proposed to ensure that mitigation is implemented and is effective.

Environmental Reports do not purport that mitigation measures will have the potential to fully avoid or mitigate the impacts, nor have additional measures been considered. Likely post-mitigation residual impacts were mentioned by one Regional Authority (BRA) only.

Table 14: Summary of Mitigation Measures

	BRA	WRA	GDA	MRA	MWRA	SERA	SWRA
Mitigation measures proposed in ER?	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Mitigation measures proposed in response to 'likely significant effects' or environmental pressures in baseline?	Yes	No	Yes	Yes	No	Yes	No
Mitigation measures proposed in response to Matrix Assessment?	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Mitigation incorporated into RPGs?	Yes	Yes	No	Yes	Yes	Yes	Yes
Majority of mitigation measures within the remit of the Regional Authority?	No	No	No	No	No	No	No
Majority of mitigation measures likely to be implemented?	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Discussion of likely post-mitigation residual impacts?	Yes	No	No	No	No	No	No
Follow-up procedures to ensure mitigation is implemented and effective?	No	No	No	No	No	No	No
					Legend:	**Yes**	**No**

Please note the above information is based on available reports and, where possible, additional information provided by Regional Authorities. The criteria listed in the summary table above are based on the Case Study Questions listed in Appendix 3.

9. Environmental Report and Non-Technical Summary

The Environmental Report should be focused on incorporating environmental considerations into the RPGs and fulfilling the legal requirements of the SEA Directive.

Non-Technical Summary: Non-Technical Summaries were generally short and concise (SWRA not available); however, one (WRA) requires further detail under the headings of the Directive. While it is a Non-Technical Summary, the matters discussed are of a technical nature and the NTS must include all Environmental Report headings. Two of the cases (BRA, MRA) provided useful summary tables; one (BRA) provided a summary of environmental pressures/problems and a link to the relevant policies, objectives, etc. in the RPGs that take account of these issues; and the second (MRA) provided a summary of the likely significant issues, mitigation measures and monitoring indicators.

Environmental Report: Two Regional Authorities (SERA, MWRA) had three maps or less. As noted in the 'Existing (baseline) Environment' section above, some Environmental Reports would have benefited from larger maps (SWRA, GDA, BRA). Another three Regional Authorities (GDA, MRA, SWRA) made particularly effective use of mapping in their assessment of environmental sensitivities (map overlays/ cumulative assessment) and in the assessment of alternatives. It is important to include legends/keys and licensing information on maps. Figures and tables were used well in all documents.

Table 15: Non-Technical Summary and Environmental Report

Non-Technical Summary	BRA	WRA	GDA	MRA	MWRA	SERA	SWRA
NTS contains sufficient detail?							unknown
Good use of tables providing summaries of key elements?							unknown

Environmental Report	BRA	WRA	GDA	MRA	MWRA	SERA	SWRA
Effective use of maps?			1	1			1
Effective use of tables and figures?							
					Legend:	Yes	No

1 'Most effective use of mapping.

Please note that the above information is based on available reports and, where possible, additional information provided by Regional Authorities. The criteria listed in the summary table above are based on the Case Study Questions listed in Appendix 3.

10. Amendments to the Draft RPGs Following Consultation

Where amendments are proposed to the Draft RPGs following consultation, they should be screened for 'likely significant effects on the environment'. In all cases, the amendments to the RPGs were screened via SEA. It is unclear whether one Regional Authority (MWRA) screened RPG alterations via AA. No 'material amendments'[26] to the RPGs were proposed by any Regional Authority, and alterations did not have any 'likely significant effects'. Therefore a further period of public consultation was not required.

The RPGs were enhanced as a result of consultation (this includes consultation on the SEA/AA documents). For the most part, changes to the Draft RPGs are minor to moderate, with the inclusion of new policies/objectives or new sections of text (please refer to Table 12). In one case (WRA) there were significant changes to the RPGs, with new policies/objectives and caveats included. It was unclear what changes were made in one set of RPGs (MWRA). Following consultation on the Draft RPG phase many of the SEA Environmental Reports were updated. In at least two cases (GDA, WRA) Environmental Report indicators and targets were altered.

It is particularly useful to have Addenda to the Environmental Report or a Final/Amended Environmental Report made available following consultation on the Draft RPGs. While there is no specific requirement in legislation, there is evidence of at least one (WRA) Amended Environmental Report being issued to the Statutory Environmental Authorities for comment prior to adoption of the RPGs.

---

26 'Material amendments' is a term in planning legislation.

Table 16: Summary of Amendments to the Draft RPGs Following Consultation

Amendments	BRA	WRA	GDA	MRA	MWRA	SERA	SWRA
SEA Screening of Amendments/ Alterations?							
Material amendments (of the RPGs) proposed?							
Consultations effectively taken into consideration?							
Screening or amended ER issued to SEA Statutory Environmental Authorities?							
					Legend:	Yes	No

Please note that the above information is based on available reports and, where possible, additional information provided by Regional Authorities. The criteria listed in the summary table above are based on the Case Study Questions listed in Appendix 3.

11. SEA Statement

The SEA Statement should contain a summary of the SEA process and how environmental considerations and the Environmental Report were factored into the preparation and adoption of the RPGs. It should provide a summary of how submissions and consultations were taken into account during the process, and the reasons for choosing the RPGs as adopted by the Regional Authority Elected Members (decision makers), in the light of other reasonable alternatives considered and the proposed monitoring measures and arrangements over the lifetime of the RPGs.

SEA Statements (including WRA Draft document) were available for six Regional Authorities (excluding BRA) at the time of the study. In general they provide a clear accounting of how the RPGs were developed and the role that SEA and consultation played in the process. Some are particularly short (MWRA) and lack details on the number of responses received during consultation and details of submitters etc. Others are quite detailed (MRA, WRA) and provide a transparent accounting of the process. In one case (WRA) it would have been useful to have a draft SEA Statement available for public consultation with the Environmental Report, as it tied together information that perhaps the Non-Technical Summary did not. One SEA Statement (SERA) lacks a key section as it has no 'reasons for choosing the RPGs in light of other reasonable alternatives'. One other (GDA) has a section on monitoring but does not contain indicators or targets. In this case RPG and SEA monitoring were combined though this was not noted in the SEA Statement.

Four SEA Statements (WRA, GDA, MRA, SERA) refer to changes made to the RPGs on account of consultations and the SEA processes, and three (GDA, WRA, MRA) distinguish where changes originated from; that is, from members of the public, stakeholders, etc. One of these three (GDA) includes reference to changes stemming from the SEA Team.

Table 17: Summary of SEA Statement

| SEA Statement	BRA	WRA	GDA	MRA	MWRA	SERA	SWRA
SEA Statements prepared (at time of study)?	No	Yes	Yes	Yes	Yes	Yes	Yes
All sections included?		Yes	Yes	Yes	Yes	No	Yes
Includes details of alterations to RPGs due to consultations and SEA?		Yes	Yes	Yes	No	Yes	No
Link between consultation proposal and changes incorporated into RPGs?		Yes	Yes	Yes	No	No	No
						Legend: **Yes**	**No**

Please note that the above information is based on available reports and, where possible, additional information provided by Regional Authorities. The criteria listed in the summary table above are based on the Case Study Questions listed in Appendix 3.

12. Post-RPG Adoption Including Monitoring

Environmental considerations have been integrated into the preparation and adoption of the RPGs. SEAs clearly influenced the preparation and final adoption of the RPGs. Each Regional Authority followed S.I. 436 Regulations 2004 and prepared the required documents at the key stages. However, it is clear that AA and SEA document integration could be improved. One Regional Authority (BRA) has yet to complete its SEA Statement.

In at least four (WRA, MWRA, SERA, SWRA) Environmental Reports or SEA Statements there is no information or not enough information on the interaction between SEA/AA/RPG teams. This could give an impression that the process was not iterative and integrated with the RPG process, if it weren't for the 'Director's Reports on Submissions' (prepared at each stage of public consultation) which explains the interactions. A summary on the exchange of information between teams and the decisions taken should be provided in the SEA Statement.

Table 18: Summary of Quality of Integration with RPGs

Quality of Integration with RPGs	BRA	WRA	GDA	MRA	MWRA	SERA	SWRA
SEA influenced the preparation and final adoption of the RPGs?							
Details in ER or SEA Statement on interaction between SEA/AA and RPG teams?							
					Legend:	**Yes**	**No**

Please note that the above information is based on available reports and, where possible, additional information provided by Regional Authorities. The criteria listed in the summary table above are based on the Case Study Questions listed in Appendix 3.

Article 10 of the SEA Directive states that *'Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and be able to undertake appropriate remedial action… existing monitoring arrangements may be used if appropriate, with a view to avoiding duplication of monitoring'*.

Each Regional Authority has prepared a monitoring programme with targets and/or indicators. In at least three monitoring programmes (WRA, GDA, MRA) there is potential to allow unforeseen adverse effects to be identified as they evolve. For example, one Regional Authority (WRA) identifies 'potential issues' that may arise in relation to an Environmental Objective *'to conserve and protect protected habitats and species'* such as cuts to funding for wastewater treatment. This would impact on water quality (for example the Biochemical Oxygen Demand (BOD) and Q-values, etc.) of a protected habitat or protected species. Despite the fact that two Regional Authorities did not identify likely significant effects in their Environmental Reports (GDA, SERA), they both contain monitoring programmes.

In three cases (MRA, SERA, GDA) the Regional Authority clearly identifies itself as being responsible for conducting monitoring or specifies that an RPG Steering committee will oversee its implementation. Two others (WRA, GDA) refer to the collation of data by the Regional Authority while three (MWRA, BRA, SWRA) do not define any responsibility.

No clear timescales have been established for conducting monitoring. While not specifically expressed, there is some evidence to suggest that monitoring will be used to inform the next RPG review process. Four (MRA, BRA, WRA, SWRA) Regional Authorities make reference to conducting monitoring in advance of the next RPGs review process, one (GDA) refers to annual monitoring, one (SERA) indicates the possibility of a two year mid-term review, and one other (MWRA) make no reference to the frequency of monitoring. One Environmental Report (SWRA) outlines the Regional Authority's proposed steps in monitoring. Reference is made in one SEA Statement (WRA) to the requirement for an 'Annual Report on Implementation of the RPGs' which must be submitted to the Members of each Regional Authority, the Local Authorities within the region and DECLG. It would be useful to have RPG and SEA monitoring combined in this document.

In all cases the monitoring programmes use existing monitoring (or statutory) arrangements by Local Authorities, state agencies/bodies and other organisations (for example EPA, NPWS). As indicated in the section on 'Objectives, Indicators and Targets', some Regional Authorities have included new monitoring proposals that will require an agreed set of formal procedures to be established at a Local Authority level if data is to be collected and provided to the Regional Authority. The feasibility of some of the proposals is unclear. One Regional Authority (WRA) refers to Local Authority responsibility for remedial actions. Three Regional Authorities (BRA, SWRA, MWRA) seek to address significant gaps in the baseline environment section through their monitoring programmes.

Three Regional Authorities (SWRA, BRA, GDA) do not include the use of 'thresholds' or 'trigger levels' that would determine the need for appropriate remedial action. Two Regional Authorities (MWRA, SERA) indentify that breaches to thresholds will occur when 'minimum standards' are not achieved and intervention is therefore required. Another (MRA) proposes five specific triggers at which the Regional Authority will take corrective action, and the final Regional Authority (WRA) identifies 'potential issues', 'positive actions' and 'remedial actions' that may arise during monitoring. The WRA also refers to Local Authority responsibility in conducting remedial actions. The level of 'corrective action' that a Regional Authority can conduct or become involved in is unclear, given that the Regional Authorities have a limited remit compared to Local Authorities.

Generally it is assumed that Regional Authorities are responsible for collating their own monitoring data. If devolution of responsibility is proposed (for example to a Local Authority) or expected, this has not been indicated in the reports. One Regional Authority (WRA) suggests that monitoring of the RPGs will establish a structure for the monitoring of Development Plans and Local Area Plans in the region.

Two Regional Authorities (MRA, SERA) link monitoring and response procedures to the hierarchy of relevant plans discussed in the Environmental Report; that is, those plans and programmes that influence the RPGs. One Regional Authority (MRA) identified the link between relevant documents and proposed environmental objectives, and categorised them by environmental topic (biodiversity, human health, climate, etc.). Despite the lack of referencing in other Environmental Reports, there are direct links with monitoring proposed. Links with the EU Water Framework, Floods, Habitats and Birds Directives are evident.

No provisions were made for the presentation of results and interpretation of monitoring programmes to Statutory Environmental Authorities and the public. Over a year and eight months following the making of the last RPGs, monitoring has yet to commence. As yet there is no statutory requirement to report on SEA monitoring at regular intervals during implementation of the RPGs.

Table 19: Summary of Monitoring

	BRA	WRA	GDA	MRA	MWRA	SERA	SWRA
Potential for the Monitoring Programme to identify unforeseen adverse effects?							
Clear responsibility for Monitoring assigned?							
Monitoring timeframes outlined?							
Use of existing monitoring procedures?							
Thresholds/Triggers for remedial actions proposed?							
Responsibility assigned for conducting 'corrective actions' when required?							
Monitoring linked to plans and programmes in the planning policy hierarchy?				1		1	
Monitoring commenced?							
				Legend:		**Yes**	**No**

1 Direct links.

Please note that the above information is based on available reports and, where possible, additional information provided by Regional Authorities. The criteria listed in the summary table above are based on the Case Study Questions listed in Appendix 3.

13. Appropriate Assessment

As outlined in Section 2.3.3 above, the Regional Authorities were required to prepare an 'Appropriate Assessment (AA)' in accordance with the Habitats Directive. AAs were not a feature of the 2004 RPGs, and Irish guidance on how to conduct the process was not available at the start of the RPG review.

Figure 11: Stages in the AA Process[27]

STAGE 1 Screening for AA	→	STAGE 2 AA	→	STAGE 3 Alternative Solutions	→	STAGE 4 IROPI

---
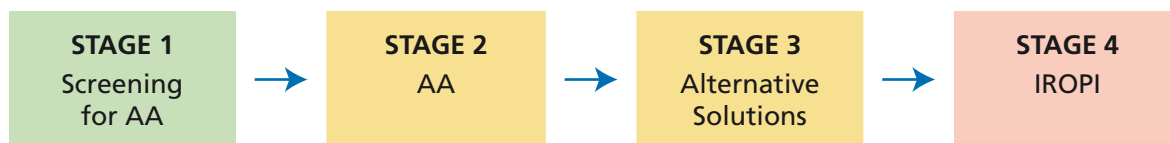
27 Source: DECLG (2009) Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities. 27pp. IROPI stands for 'imperative reasons of overriding public interest'.

Some Regional Authorities prepared Stage 1 AA Screening documents and determined that further steps in AA were not necessary while others prepared Stage 2 Appropriate Assessments. Stage 3 or Stage 4 assessments were not considered necessary by any of the Regional Authorities. In four cases (BRA, SWRA, MRA, WRA) Appropriate Assessment reporting commenced during the preparation of the SEA Environmental Report. One Regional Authority (GDA) issued an AA Scoping Document at the pre-Draft RPG consultation phase and another (MWRA) prepared an 'Appropriate Assessment Approach' document during SEA Scoping (although this was released when the pre-Draft RPG consultation phase had been concluded). The Regional Authorities made Appropriate Assessment Stage 1 or Stage 2 documents available with the Draft RPGs and SEA Environmental Report for the second phase of public consultation.

Please also refer to '6. Alternatives' above.

4.2 Summary of Case Study Analysis

An overall rating was assigned for each case study based on an analysis of each key area of SEA assessed (see Table 21). The rating system used is set out in Table 20.

Table 20: Rating System

Rating	Explanation
Best Practice	Represents best practice in current SEA methodology.
	Approaching best practice in current SEA methodology, though minor changes could bring it up to best practice standards.
	Good but requires moderate to major changes in some areas to achieve best practice standards.
	Meets requirements but goes no further.
Room for Improvement	Certain issues identified could be improved.
	To be determined, as process was not complete at the time of the study.

The research into the key areas of the SEA process indicated that there has been good scoping and evidence collection; the assessment of effects, mitigation and monitoring has been carried out less well and the Environmental Reports and SEA Statements were of varying quality.

Table 21: Summary of Case Study Ratings

SEA stage / Plan reviewed	Screening	Scoping	Consultation	Plan Description	Existing Environ	Objectives, Targets, Indicators	Alternatives	Likely Significant Effects (Impact Assessment)	Mitigation	ER and Non-tech Summary	Amendment	SEA Statement	Monitoring	Post-Adoption	Appropriate Assessment
Mid-West RPGs[28]															
Border RPGs															
Midlands RPGs															
West RPGs															
Greater Dublin RPGs															
South East RPGs															
South West RPGs															

Best Practice ← → Room for Improvement

4.3 Interview of Key Staff

Follow-up interviews were carried out (where possible) with five key Regional Authority staff involved in the review of the RPGs and its SEA process.[29] The purpose of the interviews was to uncover any information that was excluded from the Case Study Reviews or that was not obvious from the documentation. Any additional information acquired was subsequently added to the case studies. Regional Authority staff members were asked to comment on the following key areas of the SEA process:

---

28 Please note that ratings for the Mid-West RPGs were applied by RPS in the 'Review of Effectiveness of SEA in Ireland'. The WRA had access to additional Regional Authority documents (such as the 'Director's Report on Submissions') which were not assessed by RPS during its review of plans.

29 It should be noted that there were a number of staff changes following the adoption of the RPGs.

- Influence of SEA and integration with the RPGs
  - Legislative/Procedure requirements
  - Level of protection and integration
  - Improved understanding of environmental issues
  - Cost and resource effectiveness
- SEA Governance

The following outlines information provided by the interviewees.

14. Influence of SEA and integration with the RPGs

- **Legislative/Procedural requirements of the SEA Legislation**

The responses suggest that Regional Authorities made a concerted effort to follow legislative requirements and procedures. Despite this, the content of the various reports differs significantly. One respondent suggested that there should be a greater focus on the content of the reports during the SEA process, rather than merely seeking to meet the legislative requirements.

- **Level of Protection and Integration**

The majority suggested that if the SEA/AA and RPG teams worked closely together from the commencement of the RPG process, environmental considerations were effectively integrated into the RPGs. Others suggested that the integration element requires more emphasis to ensure that the findings of the SEA make their way into the RPGs.

Interviewees acknowledged that the 2009–2010 RPG Review was challenging for Regional Authorities, which had to grapple with the new AA and FRA processes and ensure that they were accommodated within the existing RPG-making process.

The SEA proved to be positive tool for planners in particular, through good team interaction and integrated processes. SEA made planners pay particular attention to the wording of RPG policies (e.g. economic policies). Where potential conflicts were identified in the SEA, discussions progressed within the RPG/SEA/AA teams to identify solutions. Subsequently necessary provisions were incorporated into the RPGs.

Some expressed the view that greater engagement from senior management may have improved the SEA/AA process. Limited resources and time restrictions were acknowledged as an issue, and a failure to properly identify environmental issues compromises the SEA process. Others suggested that the RPG Steering and Technical Groups (Local Authority senior management and senior planning staff) who guide the RPG process were very well informed of the new processes and this had a positive effect on the RPGs.

Again there were mixed responses with regard to the influence of SEA as viewed by the decision makers. Some suggested that SEA had a positive result for Elected Members (decision makers) as they knew why decisions were being recommended, although others suggest that Members may not have fully appreciated the relevance of SEA/AA in the RPG drafting process. One respondent indicated that one of the biggest failures in a plan-making process is when decision makers do not fully engage in the SEA process. Most commented on the importance of the SEA Reports (in particular the Non-Technical Summary), which should be tailored to facilitate the public and decision makers' understanding of the process. Elected Members should be involved in a meaningful way right from the Scoping process. One respondent indicated that an Elected Member who engages with the SEA process could present the SEA outcomes to the Regional Authority Chamber and garner real engagement from his/her peers.

The respondents indicated the SEA had a significant influence on the RPGs both 'when integrated right from the start of the process' and at the Draft RPG consultation stage, as this resulted in environmental objectives being strengthened and a clear direction being given to the shape of some policies and objectives. The Scoping Meeting at the pre-draft stage was also acknowledged as a useful tool to highlight the 'big environmental issues in the Region' and it provided a forum for discussion on how to address them. Another suggested that the identification of the 'big environmental issues' at the Scoping stage led to the development of alternatives and 'environmental sensitivity' assessment in the SEA.

Public consultation was considered to be a key part of the process, resulting in additional objectives or policies being included in the RPGs and matters of SEA compliance being addressed. The EPA was noted as a significant information resource and as having submitted a significant amount of information to each Regional Authority which was to the benefit of the SEA and RPGs.

While the AA identified challenging issues and sensitivities for consideration in the RPGs and the SEA, it was suggested that AA and SEA integration needs to be improved as it may not have been effective in the review of the RPGs. Interviewees suggested that an approach to combine the documents into one process should be developed. One respondent indicated that while there are best practice examples of SEA available, this is not the case for AA as it is not as well advanced. It was also recommended that SEA/AA teams should be combined where possible to prevent the processes becoming excessively drawn out and tedious. Similarly it was also suggested that Flood Risk Assessments should form part of the SEA and, as this is a relatively new process, further guidance is required.

It was suggested that the 'flow' of some of the final RPG documents was hampered by the inclusion of numerous caveats or continuous referral to AA and SEA requirements towards the end of the RPG review process, and an improvement is required in this aspect of the documentation.

■ **Improved Understanding of Environmental Issues**

Overall interviewees considered that the SEA process was well received and the general understanding of the key environmental issues in the Region was enhanced. This was considered the case for planners, those with a professional interest and, in most (but not all) cases, for the Elected Members.

Those interviewed agreed that the SEA process was effective and worthwhile and ensured that environmental issues were examined much more holistically that they would have been otherwise. One interviewee who had been sceptical of the value of SEA at the beginning of the RPG process later acknowledged that the environmental issues enhanced the process and produced valuable outputs.

Another respondent indicated that RPG Strategies/Chapters (Settlement, Infrastructure, Economic, etc.) were all examined from an environmental viewpoint and the links between the various environmental receptors were explored (e.g. the interaction of biodiversity and human health). Overlapping issues associated with climate change emerged as a key challenge in the findings of the SEA.

As a result of the SEA process, interviewees considered consultation to be more robust, with a positive influence from the very early stages through to Draft RPG stages. All Draft RPGs were accompanied by SEA Environmental Reports, AA Reports and Regional Flood Risk Appraisals for public consultation. However, one interviewee expressed a note of caution in that the general public would not read the supporting technical documents. Again most interviewees emphasised the importance of the SEA Non-Technical Summary as a key document to engage positively with the public.

SEA was considered to be a very valuable tool and not merely a tick-box exercise. Given the amount of time expended on this process, the continuous involvement of working groups and committees and wide-scale consultation, there is no indication that SEA was merely a simple, stand-alone exercise.

- **Cost- and Resource-Effectiveness**

There were various responses as regards the resource intensity of the SEA process. Some suggested it was too resource-intensive for the limited Regional Authority staff complement, so consultants were contracted to conduct the work. Clearly those who employed consultants had a greater monetary cost than those who availed of in-house (Local Authority) expertise. One respondent suggested that SEA was not resource-intensive if you had a qualified person, the SEA was appropriately detailed, focused and useful, SEA Directive/Regulations compliant and the SEA was undertaken with the objective of achieving the purpose of the SEA Directive.

The majority agree that an SEA project manager is required, as well as a qualified person or team to analyse and evaluate collated data. In this regard the use of SEA multi-disciplinary teams from within Local Authority Departments in the region was considered very useful by one interviewee, as valuable information resources exist throughout each region and should be utilised. It was acknowledged that at peak times, particularly (for example following public consultation periods), SEA was time-intensive and a challenging task. One Regional Authority interviewee acknowledged that resources (for example mapping) were limited or unavailable to the Regional Authority.

When asked if the benefits of SEA outweigh the costs, it was suggested that from the point of view of sustainable planning and development, benefits far exceeded the costs. One respondent noted that where SEA has not been carried out effectively there are risks for the environment and legal challenges, so there are a number of reasons to invest time and resources in the process.

15. Effectiveness of Governance

One respondent suggested that there is suitable legislation to govern the early stages of the SEA process, particularly at the Scoping Stage and during consultation phases. However, governance at the monitoring stage has not yet been tested. One RPG SEA Statement had omitted a required section but the statutory authorities did not identify this issue and are not required to.

The EPA has a valuable consultation role, and this was recognised by those interviewed. It plays a much stronger role than other SEA Statutory Environmental Authorities, although others have noted good engagement from the DECLG and DCENR. One Regional Authority noted that the core comments provided by the EPA during Scoping or at other consultation stages became key components of the RPGs. One respondent suggested that the EPA should remain as the lead authority and independent of those carrying out the SEA, indicating that it has sufficient responsibility and expertise with a guiding and informative role.

Others suggested that SEA could have more clout (like AA), as it only has to be 'taken into account' whereas AA has a stronger legal footing, so plan-makers may take a minimalistic approach to meet current SEA legislative requirements.

Most respondents indicated that best practice examples were required to enhance the overall quality of the process. One interviewee suggested that training Local Authority staff on SEA procedures will bring down costs of employing consultants, as resources are limited. The establishment of a more intensively resourced body (other than the EPA) was also recommended. Its role would be to have an overview of SEAs in Ireland, conduct reviews of SEA quality and ensure that findings would enhance future SEA work. It could make clearer guidance on the requirements at the various stages of SEA.

While SEA and plan-making notification is usually issued to the SAs, interviewees suggested that responses were received from only a few. For example, the GSI or Inland Fisheries (under the auspices of the DCENR) may respond but the main Department office may not.

One interviewee suggested that more effort should go into training and implementation of best practice SEAs rather than increasing enforcement powers, which can entrench the system.

5.0 Review of Existing SEA Governance Arrangements

5.1 Introduction

This section reviews existing SEA governance arrangements in relation to SEA and the RPGs, including the role of the SEA Statutory Environmental Authorities in influencing, informing and guiding the SEA process. Please refer to Section 4.3 (15) above, which summarises the comments from the interviews in relation to SEA governance.

5.2 Statutory Environmental Authorities and Consultation

Statutory Instrument (S.I.) 436 (2004) identifies the Statutory Environmental Authorities (SAs) for the purposes of SEA Legislation in Ireland. In 2011, S.I. 201 amended this list to include also the Department of Agriculture, Food and the Marine and the Department of Arts, Heritage and the Gaeltacht.

Table 22 contains the current list of SAs (as identified in S.I. 201, 2011), when to contact them and information available from their websites, etc. In the case of RPGs, all SAs (ROI) should be consulted given the wide range of topics addressed in the Guidelines. Any Regional Authority which considers that RPGs may have significant effects on Northern Ireland should consult the NIEA.

Table 22: 2012 List of Statutory Environmental Authorities for SEA, Their Consultation Remit and Available Information

Statutory Environmental Authority	When To Contact	Available Information
EPA (Environmental Protection Agency)	To be consulted in <u>all cases</u> Consideration should be given to potential significant impacts on (as *per SEA Directive*): ■ Air ■ Biodiversity (flora & fauna) ■ Landscape ■ Climatic factors ■ Cultural heritage (including archaeological & architectural) ■ Human health ■ Material assets ■ Population ■ Soil ■ Water (groundwater, surface, coastal, etc.) ■ Interrelationship between the above factors	The EPA maintains a section on SEA on its website at <u>www.epa.ie/whatwedo/advice/sea</u> with information on SEA & links to other relevant publications and websites. Data on the environment is provided for baseline research or monitoring purposes. EPA's ENVision Webviewer <u>http://maps.epa.ie/ InternetMapViewer/mapviewer.aspx</u> also provides a significant amount of visual/GIS data.
DECLG (Dept. of the Environment, Community & Local Government)	To be consulted where necessary. In practice, the EPA remains the primary environmental authority for responding to planning authorities in relation to land use plans. Collaborative liaison between the DECLG and the EPA will determine the need, where necessary and appropriate, for supplementary observations from the Department's perspective on an ongoing basis.	The DECLG maintains a section on SEA on its website at <u>www. environ.ie/en/DevelopmentHousing/ PlanningDevelopment/Environmental Assessment</u> with SEA and EIA Legislation and SEA Guidance information.

Statutory Environmental Authority	When To Contact	Available Information
DCENR (Dept. of Communications, Energy & Natural Resources which includes GSI & Inland Fisheries Ireland)	Where it appears that a plan (or modification) might have significant effects on: fisheries or the marine environment.	The DCENR no longer maintains a section dedicated to SEA on its website. Contact details for Inland Fisheries Ireland and Geological Survey of Ireland, etc. are available. Spatial data can be found at: www.dcenr.gov.ie/Spatial+Data
DAFM (Dept. of Agriculture, Food and the Marine)	Where a plan (or modification) may have a significant impact on fisheries or the marine environment. Consideration should be given to potential significant impacts on: ■ Water quality ■ Seabirds and marine mammals ■ Surface water hydrology ■ Fish and shellfish cultivation ■ Fish spawning and nursery areas ■ Sport and commercial fishing and angling ■ Passage of migratory fish ■ Amenity and recreational areas ■ Areas of natural heritage importance ■ Mineral and aggregate resources including geological heritage sites ■ Sediment transport and coastal erosion ■ Designated marine protected areas ■ Navigation ■ Biological diversity ■ Other legitimate use of the sea ■ Ecosystem structure and functioning	DAFM maintain a section on SEA on its website (The information contained on the website was formerly found on the DCENR website): www.agriculture.gov.ie/fisheries/environmentalassessment/introduction

Statutory Environmental Authority	When To Contact	Available Information
DAHG (Dept. of Arts, Heritage and the Gaeltacht)	To be consulted where it appears to the competent authority that the plan or programme, or amendment to a plan or programme, might have significant effects in relation to: ■ Architectural heritage ■ Archaeological heritage ■ Nature conservation ** This is of particular relevance where AA is being undertaken; it may also be necessary to arrange a meeting with the Divisional Ecologist (NPWS).*	There is currently no section dedicated to SEA on the Department's website. Details of 'heritage' aspects covered by the Department are found at: www.pobail.ie/en/Heritage There are links to the National Parks & Wildlife Service, National Monuments Service and National Inventory of Architectural Heritage.
NIEA (Northern Ireland Environment Agency, Department of the Environment, Northern Ireland)	Where it appears that a plan or amendment to a plan may have significant environmental transboundary effects. Transboundary consultations will be most likely undertaken in the context of RPGs for the Border Region. The DECLG should be contacted before transboundary consultations take place.[30]	NIEA maintains a section on SEA on its website at www.doeni.gov.uk/niea/built-home/conservation-2/sea-natural.htm with information on SEA and links to other relevant publications and websites. Contact details for the SEA Coordinator are also provided.

This table is based on S.I. 201, 2011 and available information on the websites listed above and adapted from EPA, CCC & WRA (2010) Draft SEA Implementation Manual. Unpublished. Environmental Protection Agency, Cavan County Council & West Regional Authority.

At the time of the RPG Review, there were four SAs listed in S.I. 436 (2004) that were consulted on SEA:

■ The Environmental Protection Agency;

■ The Minister for the Environment, Heritage and Local Government (now called DECLG);[31]

■ The Minister for Communications, Marine and Natural Resources (now called DCENR); and,

■ The Department of the Environment, Northern Ireland (SEAs are now referred to the Northern Ireland Environment Agency)

---

30 Please refer to DEHLG (2010) *Best Practice Guidance Note on SEA Transboundary Consultation between Ireland and Northern Ireland*.

31 DEHLG (in existence during the RPG review) functions were split between the Department of the Environment, Communities & Local Government and the Department of Arts, Heritage and the Gaeltacht as of May, 2011.

5.3 Influence of the Statutory Environmental Authority on the SEA Process

The SAs can influence, inform and guide the SEA process when the Regional Authority seeks to engage or consults them. Table 23 provides a snapshot of the SEA stages and when the SAs can make a contribution to RPGs review.

Table 23: Consultation with the Statutory Environmental Authorities on Key SEA Report Stages

SEA Stage	Description of the SEA Stage	Consultation
Scoping	The scope and level of detail of information to be included in the Environmental Report is decided at this stage.	👍 *
Environmental Report	In the Environmental Report the alternative development scenarios are created and assessed, the likely significant effects of implementing the Draft RPGs are identified and mitigation measures are proposed to prevent, reduce, offset the significant impacts, etc.	👍 *
Information post-adoption (SEA Statement)	A statement must be provided on how environmental considerations have been integrated into the RPGs including submissions, observations and consultations, reasons for alternative chosen and monitoring measures.	👎
Monitoring	Regional Authorities are required to carry out monitoring of 'likely significant effects' of implementing the RPGs as identified in the Environmental Report. Environmental data held by the EPA may be required to monitor the effects of implementing the RPGs.	👎

Legend:	Good consultation	👍
	Infrequent/no consultation	👎

* Statutory Consultation

Source: Adapted from EPA, CCC & WRA (2010) Draft SEA Implementation Manual. Unpublished. Environmental Protection Agency, Cavan County Council & West Regional Authority.

Table 23 shows the potential for SAs to engage at the early stages of the RPG Review process (prior to drafting) and at the Draft RPG stage, though the input fades towards the end of the process. While it is not documented, many Regional Authorities and Local Authorities engage in informal consultation with the SAs (EPA and NPWS in particular) to enhance the SEA process. Table 24 outlines who will respond, at what stage and how much time SAs have to make a submission or observation to the Regional Authority. The Statutory Environmental Authorities are not statutorily required to make a submission at any stage.

Table 24: Consultation with SAs

SEA Stage	RPG Stage	Statutory Environmental Authority (SA) Consultation Role	Minimum Period for Consultation
Scoping	Pre-Draft Regional Planning Guidelines	SAs will normally respond within the statutory time period with a submission or observation in relation to the scope and level of detail of information to be included in the Environmental Report. In the case of the EPA this response may be by way of letter, e-mail or voice communication at its discretion; and in complex cases, an agreement may be sought on a later date for consultation with the competent authority. Exceptionally, where higher risk plans take up all available resources, no response may be made. The NIEA may also provide a 'no comment' response to a consultation if it has not identified any significant issues, or does not hold relevant information.	4 weeks
Environmental Report	Draft Regional Planning Guidelines	SAs in the Republic of Ireland may respond at their own discretion if their views have not been taken into account at the Scoping stage. SAs will normally respond if Transboundary Consultation has been sought by another Member State.	10(+) weeks
SEA Statement	Regional Planning Guidelines (made)	SAs will not normally respond at this stage, though they should be informed.	–
Monitoring	Regional Planning Guidelines (made)	SAs will not normally respond at this stage, though they should be informed.	–

The above is based on PDA 2000–2010, S.I. 436, 2004; S.I. 201, 2011; S.I. 100, 2009 & EPA, CCC & WRA (2010) *Draft SEA Implementation Manual*. Unpublished. Environmental Protection Agency, Cavan County Council & West Regional Authority.

5.4 Analysis of Case Studies and Interviews

Consultation

Analysis of the case studies suggests that the Regional Authorities sought to engage with the SAs in the Scoping process and they responded in kind. Both the case studies and the interviews suggest that SA engagement is strongest in the early stages of SEA. It would appear that the engagement of the SAs dwindles towards the latter stages of the SEA process, with the compliance of SEA Statements (with S.I. 436 2004) going unchecked. There is no legislative incentive for Regional Authorities and Local Authorities to carry out regular monitoring.

The SAs provided the Regional Authorities with very useful and important information. The EPA's role is considered to be particularly important. While Table 22 above sets out the specific areas that the various SAs focus on, there was duplication of some information issued to the Regional Authorities and it is clear that the SAs are not aware of each other's submissions.

The case studies indicated that it is not always clear how the environmental considerations raised in SA submissions have been incorporated in the SEA Environmental Reports. The case studies revealed that the Regional Authorities did not receive submissions from all SAs during the RPG process. Therefore some SAs may not be equipped (e.g. with staffing resources) to respond to SEA consultation and to engage with the process.

During the RPG process, the *DECLG (2010) Best Practice Guidance Note on SEA Transboundary Consultation between Ireland and Northern Ireland* was developed between the Border Regional Authority, DECLG and Northern Ireland Environment Agency. This shows a good working relationship and the ability to eliminate procedural deficits within the current SEA governance arrangements.

Guidance & Procedures

The DECLG and the EPA produced guidance documents (in 2003/2004) to aid the implementation of SEA legislation. Despite this, the RPG case studies highlighted many procedural issues which remain unresolved. SEA Reports are inconsistent despite (for the most part) meeting legislative requirements. The key difficulties that arose during the RPGs are related to mitigation, alternatives, range of significant effects including cumulative assessment, matrix assessment techniques and the description of the likely evolution of the environment in the absence of the RPGs. These are all critical components of the process and in the absence of clear guidance, there are a variety of approaches adopted that may not be effective. However, guidance needs to evolve alongside the evolution of SEA techniques and approaches.

In order for SEAs to reflect the true 'state of the environment', Regional Authorities and other authorities must gain access to readily available, up-to-date and relevant data.

Perception of SEA

There is a common perception that SEA does not have a similar restrictive role to that of AA under the Habitats Directive (which has been the subject of legal challenges). There is potential for the legal requirements of the SEA Directive to be restated and clarified to ensure that it is not overlooked by plan-makers.

6.0 Effectiveness of SEA in the RPG Process

6.1 Introduction

This chapter draws conclusions on the strengths and weaknesses of SEA in the RPGs review, based on the case studies, interviews and existing governance arrangements. Some of the general findings are outlined below and this is followed by a table of strengths and weaknesses. This section concludes by examining the main questions identified in Section 1 of this report. Section 7 sets out recommendations and key actions to deal with areas of SEA weakness.

6.2 General Findings

Overall the SEA process was an effective means of integrating environmental considerations into the RPGs to provide a high level protection of the environment. SEA helped to identify the significant effects; it helped to integrate environmental concerns into the RPGs; and SEA governance is broadly effective. However, there are clear aspects that need to be improved. The quality of the SEA *inputs* in Ireland varies from 'very good' (e.g. scoping) to leaving 'room for improvement' (e.g. mitigation and monitoring), as shown in Table 21. Understanding of the quality of SEA *outcomes* is hampered by lack of buy-in from decision-makers and a lack of monitoring.

Figure 12: Overview of Effectiveness of SEA Inputs and Outcomes
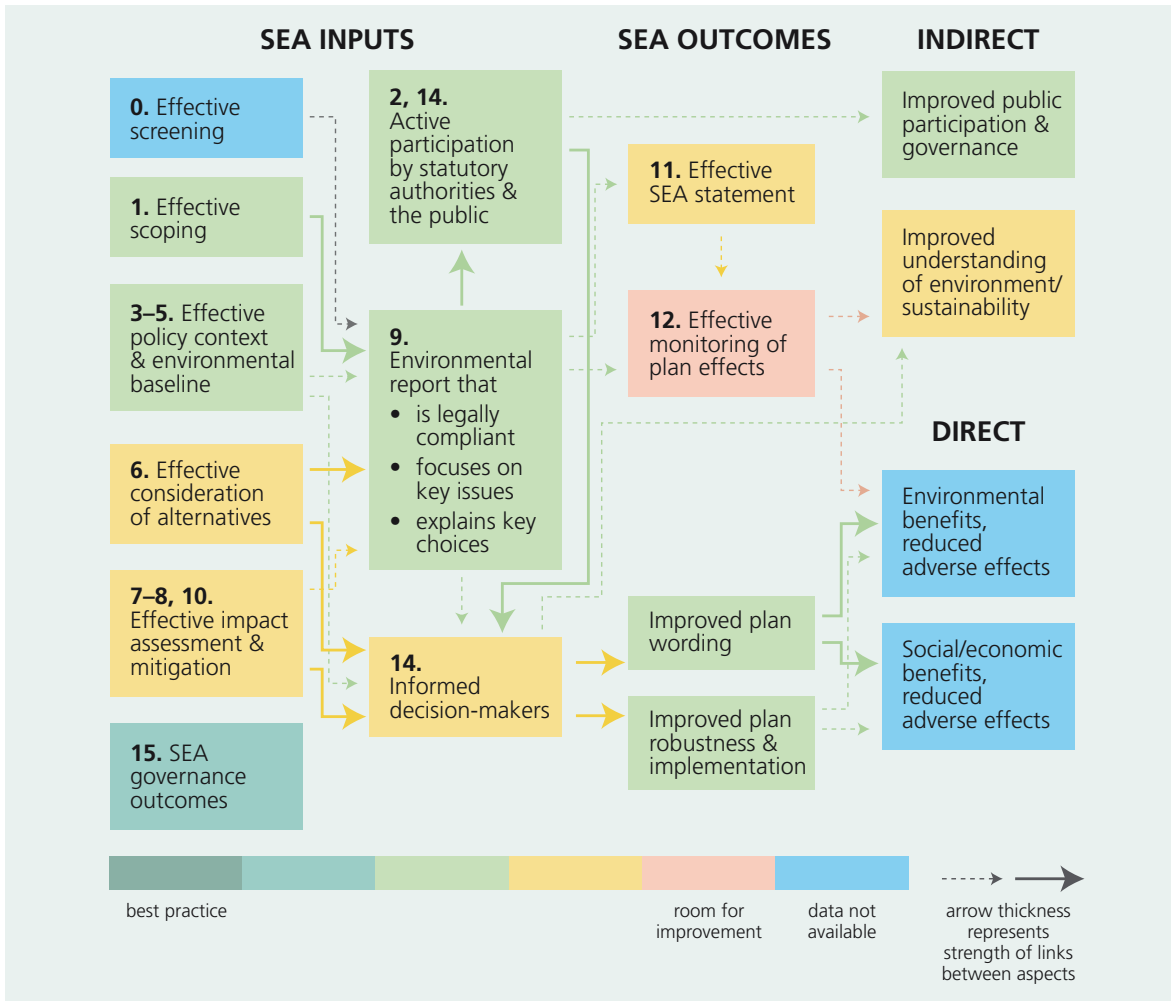
Please note that the figure above takes account of findings from case studies and interviews, therefore it is slightly different to the findings of Table 21.

Inputs

1. During SEA Scoping, the major regional environmental problems should be identified first, i.e. what should go into the Environmental Report. Following this, agreement should be reached on what does not need to go in (though this can be difficult as RPGs can affect many aspects of the environment).

2. The Statutory (SEA) Environmental Authorities were very helpful and provided useful advice and information during consultation on the RPGs; however, public involvement in SEA was very limited.

3–5. All Environmental Reports provided a good description of the RPGs, policy context, and an environmental baseline, although there were gaps in available data.

6. The consideration of SEA alternatives was limited in some cases as some planners felt that certain decisions made in higher-level planning policy documents and previous RPGs must be followed, which left little scope for new alternatives. Planning legislation requires RPGs to be consistent with the National Spatial Strategy.

7–8. All impact assessment (including cumulative, synergistic, etc. and the interrelationships between the impacts) and mitigation could be improved.

9. The quality of the Environmental Reports was high, but they often do not focus tightly enough on key issues, and often they do not explain clearly why certain choices were made or how SEA mitigation measures were integrated into the RPGs.

10. Amendments to the RPGs were all considered in SEA though the reports could have been made available for public viewing.

11. One RPG's SEA Statement was not prepared at the time of this review. There is a legal requirement to prepare such documents and they are a very useful record of the SEA process.

12. Monitoring of the environmental impacts of implementing the RPGs has not begun (at least one year and eight months following their adoption).

13. Appropriate Assessment (under the Habitats Directive) and SEA should be more effectively integrated or linked.

14. Greater 'buy-in' to the benefits of SEA by decision makers is needed in some cases. SEA should not be treated as a parallel exercise but should be integrated with the RPG-making process.

15. SEA governance is generally strong, but there could be stronger legal emphasis on the need to complete SEA Statements. Statutory Environmental Authorities could prepare guidance notes on various aspects of SEA, as similar errors are being repeated.

Outcomes

■ Planners suggest that SEA significantly improved the RPG process and made the RPGs more environmentally robust, with environmental resources being considered in greater detail than would have been the case (in the absence of the SEA Directive).

■ Monitoring of the RPGs must be carried out regularly to ensure that SEA leads to environmental, social or economic improvements and prevents environmental, social or economic harm.

6.3 Key Strengths and Weaknesses

Table 25 presents an analysis of key strengths and weaknesses of SEA practice in the RPG process to determine how effectively environmental considerations were integrated into the RPGs 2010–2022. The table is based on the case studies and interviews.

Table 25: Strengths and Weaknesses of SEA (Case Studies and Interviews Analysis)

Strengths & Weaknesses		
SEA Stages	**Strengths**	**Weaknesses**
1. Scoping	■ Consultation periods open for 8+ weeks (4 more than required) ■ Good consultation – Regional Authorities sought to engage with the public and a wide range of organisations; this included workshops/meetings with statutory authorities ■ RPG Reports complement SEA Reporting stages (i.e. pre-draft RPG Issues Paper & Scoping Paper) ■ RPG Report on consultation (Director's Report) can include SEA responses *Best practice examples in relation to Scoping include: BRA*	■ AA and SEA scoping are not integrated or informing each other ■ SEA Scoping Report is not obligatory ■ Difficult to scope out issues at a regional level ■ Difficult to determine the level of detail in the ERs at a regional level (especially as AA can be very specific) and this can result in long ERs that may not focus on key issues ■ Poor use of time and resources if the above is not achieved
2. Consultation on Draft RPGs & ER	■ Consultation periods open for 10+ weeks (6 more than required) ■ Good involvement of SEA Statutory Environmental Authorities ■ Meaningful consultation with the public and a wide range of organisations ■ Consultations resulted in numerous alterations to the RPGs (robustness) ■ RPG Reports complement SEA Reporting stages (e.g. Draft RPGs and SEA Environmental Report available at the same time) ■ RPG Report on consultation (Director's Report) includes responses on SEA ■ New 'Best Practice Guidance Note' on transboundary consultation *Best practice examples in relation to draft RPGs consultation include: MRA, WRA, BRA, GDA, SERA, SWRA* *Best practice example on transboundary consultation: BRA*	■ Failure to document Scoping responses and link with key outputs from SEA Environmental Report

Strengths & Weaknesses		
SEA Stages	**Strengths**	**Weaknesses**
3. Description of RPGs & review of other plans	■ Descriptions of RPGs and other plans are generally good *Best practice examples of the plan description and review of legislation include: GDA, SWRA*	■ Wide variation in number of influencing plans and programmes referenced – no guidance on what should be included/excluded ■ Key plans and programmes not listed under headings (e.g. listed under 'water', 'landscape', etc.) ■ Conflicts between higher level plan objectives or objectives that the RPGs must follow/be consistent with were not documented ■ This section of the ER was not clearly linked to 'environmental objectives'
4. Existing environment	■ Some good examples of constraint/ sensitivity mapping ■ Baseline information is a 'state of the environment report' for each region *Best practice examples GIS: MRA, GDA and SWRA*	■ Resource-intensive ■ Environmental information is not concise ■ 'Significant gaps' in environmental information not documented or addressed ■ Evolution of the environment in the absence of the RPGs not addressed at all or not addressed by SEA topic (e.g. dealt with under cultural heritage, material assets, etc.) ■ Mapping techniques (e.g. modelling) not explained; some maps are too small ■ No mapping facilities or lack of a centralised, consistent, up-to-date data and easily accessible database; those RAs that used GIS models made use of limited spatial environmental information ■ Scoping issues not addressed in the Environmental Report ■ Baseline hampered by a lack of data on specific topics (e.g. habitats and designated sites, soil conservation techniques) or inconsistent data sets

Strengths & Weaknesses		
SEA Stages	**Strengths**	**Weaknesses**
5. Objectives, indicators and targets	■ Objectives linked with higher level plans etc. but are tailored to meet requirements of RPG SEA ■ Objectives, indicators and targets (O/I/T) linked to each other and linked to environmental problems identified in the 'Existing Environment' ■ O/I/T categorised by topic (e.g. human health, climate) ■ Most Environmental Reports contain a manageable number of indicators *Good example: SERA*	■ Failure to set limits/thresholds for intervention or set dates to meet targets ■ Regional Authority (RA) remit is limited – Indicators are often parameters that the RA do not have authority over ■ Rigorous assessment of I/T was not carried out (e.g. types of indicators used) and likely success of addressing environmental issues ■ Responsibility for monitoring not being clearly established may mean it is not carried out
6. Alternatives	■ SEA widens the scope of alternatives considered ■ GIS constraints/sensitivity mapping is a useful support in their assessment *Best practice example: GDA*	■ Generation of reasonable/realistic alternatives is a big challenge ■ Some alternatives were based on previous RPG alternatives or predetermined decisions in the planning policy hierarchy, were not devised in the SEA ER, or were retrospectively included in the ER ■ Limited assessment of alternatives and no detailed analysis of the chosen alternative ■ Reasons for the developing specific alternatives not clearly outlined ■ Early days for mapping models and more testing is required ■ Do-nothing option or business as usual option was not used ■ Basic limitations of all alternatives not discussed (e.g. infrastructural availability) ■ Emergence of preferred alternatives that are unsustainable may have potential impacts on the environment ■ Failure to utilise AA in development and assessment of Alternatives with potential impacts on Natura 2000 network

Strengths & Weaknesses		
SEA Stages	**Strengths**	**Weaknesses**
7. Likely significant effects	■ Constraints mapping is a useful tool ■ Environmental objectives are used to assess the plans *Good examples:* *Assessments: GDA, MRA, BRA, WRA, SERA, SWRA* *Assessment tools: GDA, MRA, SWRA* *Cumulative and synergistic effects: GDA, MRA, SWRA*	■ Failure to assess all categories of effects (in particular cumulative, synergistic, secondary, permanent and temporary effects) and interrelationships between effects – insufficient assessment may result in eventual impact on the environment ■ 'Likely significant effects' not distinguished from other baseline environmental pressures or problems ■ Failure to explain how impacts were predicted ■ Uncertainties as to the 'likely significant effects' on the environment of a strategic or indicative policy or objective in the RPGs ■ Poor presentation of Matrix Assessment (i.e. RPG objectives compared to SEA objectives) or poor discussion of same
8. Mitigation measures	■ Proposed mitigation measures were specific to potential effects of implementing the RPGs ■ The wording of policies/objectives provides strong commitments to protect environmental vulnerabilities identified *Good examples: BRA, MWRA*	■ Likely significant effects are not properly mitigated where mitigation measures are not incorporated into the final RPGs ■ Unclear how SEA/AA influenced the RPGs ■ Overall added value and influence of SEA/AA in RPG process not acknowledged in RPGs ■ Potential residual (outstanding) impacts are not explored ■ No agreement with other bodies/ authorities to conduct mitigation (if necessary)

Strengths & Weaknesses		
SEA Stages	**Strengths**	**Weaknesses**
9. ER and NTS	■ GIS and constraints maps are particularly useful ■ NTS is a key means of ensuring that decision makers and non-environmental stakeholders are aware of SEA findings ■ NTS is concise ■ Evidence-based information supported better decision making in the RPGs *Best practice examples NTS: BRA, GDA and MRA* *Mapping: GDA, MRA and SWRA*	■ Long SEA Environmental Reports ■ NTS must refer to technical SEA headings but ambiguous 'technical' language used ■ No use of mapping in the NTS or it is of insufficient size/scale ■ No bibliography in the Environmental Report, no map license details or no legends ■ Elected Members (decision makers) and the public not engaging in process
10. Amendments to the RPGs	■ Alterations/Amendments were screened through SEA/AA and this indicates that consultations were taken seriously and enhanced the RPGs *Best practice examples: GDA, BRA, WRA, MRA, SWRA, SERA*	■ Documentation and transparency of amendment stage need improvement ■ As significant changes to the RPGs were not proposed, SAs or the public were not consulted ■ Consultation with Statutory Environmental Authorities may have highlighted potential environmental impacts or synergistic effects from the amendments to the Draft RPGs
11. SEA Statement	■ SEA process very transparent once an SEA Statement has been prepared correctly and outlines the role that consultation played *Good examples: MRA, WRA, SWRA, GDA*[32]	■ Lack of formal requirement for SAs to review SEA Statements; no consultation on SEA Statements (e.g. on Draft SEA Statement) required and contents can be inconsistent or omit necessary sections ■ Lack of guidance on the requirements of an SEA Statement ■ SEA Statement not summarising the key decisions taken by the SEA/AA and RPG teams ■ Lack of mapping in SEA Statements

---

32 The GDA's SEA Statement is a good example; however it omits sufficient detail on monitoring and does not include indicators. While RPG and SEA indicators are combined elsewhere, there is no reference to this in the SEA Statement.

Strengths & Weaknesses		
SEA Stages	**Strengths**	**Weaknesses**
12. Post-RPG adoption including monitoring	■ Good links between potential effects, mitigation and proposed monitoring in most cases ■ Monitoring programmes can be altered if required ■ Monitoring is based on existing monitoring arrangements ■ Monitoring will inform the next review of the RPGs *Good examples (Monitoring): SERA, WRA* *Good examples: BRA, MRA, WRA, GDA*	■ Monitoring of the RPGs has not begun ■ Guidance on how to create a monitoring programme is required as there is a lack of clarity on what is required from SEA monitoring (responsibility for monitoring, coordination, implementation, frequency of reporting (including presentation), monitoring 'unforeseen impacts' and thresholds/ trigger levels for intervention based on monitoring ■ Failure to set timeframes to meet targets ■ Lack of national monitoring standards for land use plans and central monitoring database (i.e. potential inconsistencies in data sources used) ■ No one responsible for checking that mitigation measures are being implemented ■ No requirement to report to the SAs or the public ■ No agreement with other authorities to carry out new monitoring procedures to suit new indicators proposed by RAs ■ Lack of resources for any new monitoring proposals (e.g. at a Local Authority level) ■ RPG and SEA monitoring proposals not combined ■ Regional Authority intervention when thresholds are breached is limited or unlikely given its remit

Strengths & Weaknesses

SEA Stages	Strengths	Weaknesses
13. Appropriate Assessment	■ AA Screening and/or AA Stage 2 carried out by Regional Authorities *Good examples: SWRA*	■ SEA and AA are poorly integrated from the beginning of the RPG review ■ AA was not used in the development of SEA alternatives – potential for a preferred SEA alternative to impact on Natura 2000 sites – e.g. inappropriate projects progressed through planning ■ RPGs drafted prior to the release of DEHLG/NPWS Guidelines on AA in Ireland
14. Influence of SEA and integration with plan-making	■ SEA has had a positive influence and improved the RPGs ■ SEA is identifying and addressing significant effects; it helps to avoid environmentally damaging development or mitigates significant effects, therefore it provides a basis for better planning decisions ■ Beginning the SEA process early positively influenced the RPGs ■ SEA raised awareness/understanding of environmental considerations and has provided a learning outcome for planners ■ SEA makes planners address other Directives such as the Water Framework, Habitats and Birds Directives and Floods Directive ■ EPA is a key information resource and had a significant influence on SEAs and RPGs ■ Cost- and resource-effective where qualified project manager is in place ■ Consultation (SEA & RPG) benefited the RPG review process at all stages ■ Awareness of valuable information within Local Authority departments	■ AA and SEA are separate processes and should be combined. SEA/AA/FRA and RPGs not well integrated ■ Unclear if SEA/AA teams were well integrated ■ Difficulties in identifying which changes to the RPGs resulted from the SEA process ■ SEA is resource-intensive – Regional Authorities relied on Local Authority staff within their region or consultants to carry out work ■ Limited resources to conduct the SEA process (e.g. personnel, IT) ■ Quality of the content of SEA Reports should be improved, with a focus on the effective integration of the SEA outcomes into the RPGs ■ Decision makers may have limited understanding of the benefits of SEA therefore a concerted effort to engage decision makers, Regional Authority and Local Authority management staff is required ■ Environmental issues must be properly identified ■ SEA is not a simple exercise and is challenging given the statutory time constraints in the Planning & Development Act 2000, as amended ■ SEA/AA integration in the RPG document can result in disjointed final documents (e.g. with caveats at the end of policies)

Strengths & Weaknesses		
SEA Stages	**Strengths**	**Weaknesses**
15. SEA governance	■ SAs are appropriate for the process, with the EPA providing a critical role ■ EPA's informing/guiding role has enhanced the process ■ Best engagement of SAs witnessed in the early–mid stages of the RPG review ■ Capacity within existing governance arrangements to eliminate procedural deficits (e.g. new Best Practice Guidance Notes)	■ A perception that SEA (especially when compared to AA) does not have much legislative weight and so can be ignored ■ No single body is responsible for governing the process (i.e. EPA, DECLG, etc. have an informative role) ■ SAs are not aware of each other's submissions (duplication of tasks) ■ No provisions for SA review of SEA Statements or monitoring timescales set out in legislation ■ SAs without dedicated personnel to engage with SEA process for RPGs and other plans or programmes ■ SAs do not follow up on monitoring procedures ■ No independent body tasked with conducting reviews of SEA procedures to enhance their effectiveness

As indicated previously, the effectiveness of SEA in the RPG review process was considered under the following four questions:

Question 1	What influence did the SEA process have in identifying the significant effects of implementing the RPGs? *(see Section 6.4)*
Question 2	Did the SEA process inform and support effective integration of environmental concerns into the RPG-making process? *(see Section 6.5)*
Question 3	What opportunities exist to improve the SEA process? *(see Sections 7.1 & 7.2)*
Question 4	How effective is SEA governance? *(see Section 6.6)*

6.4 What Influence did the SEA Process have in Identifying the Significant Effects of Implementing the RPGs?

SEA enhanced the understanding and awareness of environmental issues in the Regional Authority areas and it enhanced the RPG review process by contributing to the creation of more robust and sustainable documents than would otherwise have been the case. Regional Authorities identified the environmental pressures/problems within their region through a baseline on the 'current state of the environment'. The Regional Authorities took these issues into consideration in the drafting of the RPGs, although only five of the seven specifically identified 'likely significant effects' for consideration.

Meaningful consultation at the SEA Scoping/pre-draft RPG stage led to successful identification of the likely significant effects. Some of the Regional Authorities made good use of Geographical Information Systems (GIS) and computer modelling techniques in order to conduct spatial analysis on the environmental effects that might occur in the region, though not all Regional Authorities had mapping resources available to them.

One of the drawbacks in identifying the likely significant effects was the lack of up-to-date, relevant and readily accessible data (both paper-based and digitised GIS data), as this curtailed the presentation of findings on the state of the environment and analysis using GIS. The Regional Authorities' description of the 'evolution of the environment' in the absence of the RPGs could be improved, as it could have been used to make comparisons with the likely effects of implementing the RPGs.

In particular, the study has shown that Regional Authorities should ensure that likely significant effects on the environment from implementing the RPGs are separated from other baseline environmental pressures or problems. There was an inability to assess the full range of effects identified in the SEA Directive (namely cumulative, synergistic, secondary, permanent and temporary effects) and the interrelationships between these effects. The method of impact predication was not discussed. The strategic and indicative nature of many of the policies of the RPGs left uncertainties as to what effects could occur, so mitigation of likely significant effects usually involved the displacement of 'responsibility for further assessment' to lower level plan or project stages.

6.5 Did the SEA Process Inform and Support Effective Integration?

The SEA process helped integrate environmental concerns into the RPG-making process and, as previously indicated, it had a positive influence, improving the robustness of the RPGs and providing the basis for better planning policies. The SEAs sought to identify and address or mitigate significant effects on the environment through the text and policies in the RPGs.

The study revealed that to be most effective, the SEA process must begin at the formative stage of the RPGs. In order to accomplish this, RPG and SEA/AA teams must be closely linked, ideally led by an experienced project manager. Good team integration should ensure good-quality, focused reports and effective integration of SEA outcomes into the RPGs. However, the study revealed that AA and SEA were not effectively integrated during the RPG process, as best practice examples and practitioner experiences of AA were limited at the time.

The SEA process resulted in a learning outcome for the planners involved, and they are much more aware of the need to integrate environmental concerns into all aspects of their work. The collection of information for the baseline on the current state of the environment revealed valuable environmental data resources within Local Authorities in the regions.

SEA was considered a very valuable tool but the process was challenging and required a significant investment of time by RPG/SEA/AA teams, Regional Authority staff, Local Authority staff, decision-makers (Elected Members), statutory authorities, etc. All Regional Authorities sought to make use of the SEA to integrate environmental considerations; however, tight timeframes (in planning legislation) may have impinged on the quality of SEA inputs given the difficult task of assembling baseline data and ensuring that analysis of likely significant effects was carried out by experienced practitioners. On occasion it was difficult to identify what alterations were made to the Draft RPGs or final RPGs as a result of the SEA process, and this aspect of the reporting must be improved.

Consultation is a key part of both the RPG and SEA processes, and it was particularly useful to have key SEA and RPG reports available for public consultation at the same time (e.g. Draft RPGs and Environmental Report). The outcomes of consultation significantly improved the RPGs. The 'Director's Report on Submissions' derived from planning legislation which is prepared following each RPG consultation stage enhances the transparency of both SEA and RPG decision-making. Consultation with the SAs was very valuable as they contributed information, assistance and advice in the identification of environmental pressures or problems within each Region.

It is the role of the decision makers (Elected Members) to make the RPGs. They must be involved in the SEA process from the outset. The Non-Technical Summary (part of the Environmental Report) is a key document to inform decision makers of the outcomes of SEA. While some Elected Members and senior management staff were generally supportive of the findings of SEA, increased engagement with the Members from the early stages of the process would be beneficial.

6.6 How Effective is SEA Governance?

For the purposes of the 2009–2010 RPG Review, SEA was carried out in accordance with S.I. 436 (2004) and it is clear that the legislation influenced the preparation of the RPGs. Discussions with key staff involved in the RPG review process reveals a general perception that SEA does not have similar legislative weighting to that of other environmental assessments such as AA (Habitats Directive), so environmental problems identified in the SEA could be ignored by decision-makers if they chose to do so. While this did not occur in the RPG review process, the legal interpretation of the requirements of the SEA Directive must be clarified.

It is possible to eliminate minor procedural deficits within the current SEA legislation through informal working relationships. One example is where a 'Best Practice Note on SEA Transboundary Consultations' was developed (during the RPG review process). Examples of best practice SEA reports and new guidance notes will reduce many of the current weaknesses.

The SAs' role is considered to be very useful to plan-making authorities, and their input greatly improves the outcomes of SEA. While the SAs have a strong legislative role in the formative stages of SEA and RPGs, their effect dwindles towards the end of the process; that is, there is no emphasis on the SEA Statement or Monitoring. Minor alterations to the legislation should ensure that there is a stronger focus on these key areas. The study also suggests that some SAs may not retain dedicated staff for the SEA process and that SAs are not aware of each other's submissions during consultation, as much of the content of submissions overlaps. In order to enhance SEA effectiveness, there may be benefits from having periodic reviews of SEA procedures carried out by an independent body.

7.0 Recommendations – Key Areas for Improvement

7.1 What Opportunities Exist to Improve the SEA Process?

Based on the conclusions of Section 6, this section seeks to present recommendations on how SEA integration, effectiveness and governance can be improved. Full recommendations are presented in Appendices 1 and 2.

7.2 Recommendations

Key recommendations on guidance, training and awareness, and governance and legislation are outlined below (see Tables 26–28). Figure 13 highlights areas of the SEA process that have clear links to outcomes and which require further emphasis in order to improve outcomes and effectiveness.

Figure 13: Focus on Areas to Improve SEA Effectiveness
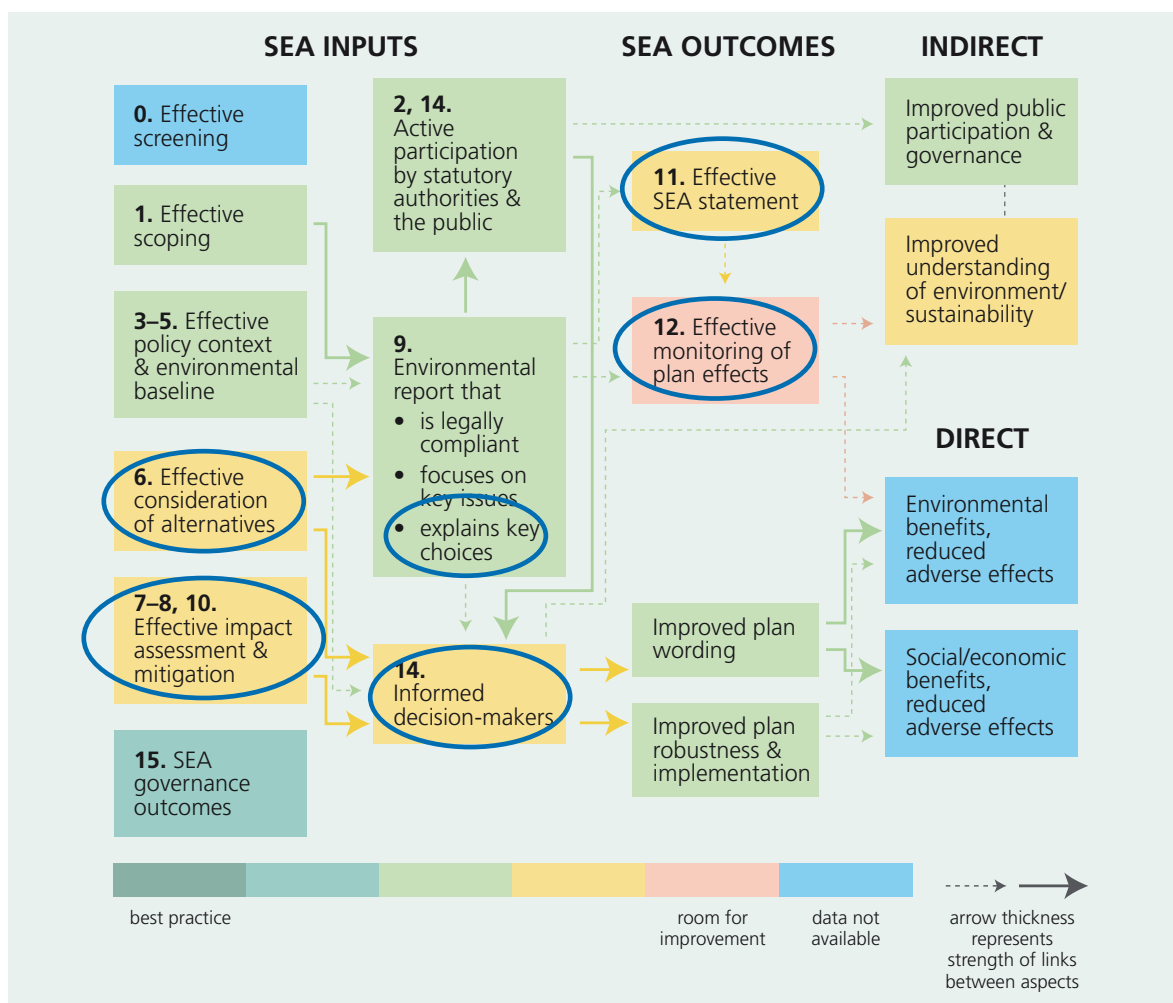
Please note that the figure above takes account of findings from case studies and interviews – therefore it is slightly different to the findings of Table 21.

The areas for improvement relate to the following.

Identification, assessment and documentation of alternatives that are necessary to provide useful information to decision-makers and support policy direction;

Effective assessment of all types of 'likely significant impacts' so that they can be successfully mitigated through the text/policies of the RPGs;

Decision-makers need to understand the role and importance of SEA in order to make best use of it to improve the RPGs. At the moment, many decision-makers do not 'buy into' SEA. Non-Technical Summaries are very important documents to engage decision-makers;

SEA Statements are the main way that SEA effectiveness is documented and the quality should be improved;

Monitoring makes it essential to know whether SEA ensured the desired outcomes of environmental protection and improved understanding and integration of environment considerations in decision-making.

best practice ⟵——————————————————— room for improvement   NA

The tables below provide an indication of the parties that may be appropriate to implement the recommendations. However, they are suggestions only and do not represent commitment by any party. It is anticipated, based on the findings of this review and the 'Review of Effectiveness of SEA in Ireland', that SAs will formulate an agreed strategy for improving SEA effectiveness.

The division into short- (ST = within a year), medium- (MT = 1–3 years) and long-term (LT = >3 years) recommendations reflects (1) how straightforward it would be to implement the recommendation and (2) whether it is a priority recommendation.

Table 26: Actions for Implementation: Guidance

Priority recommendations are outlined in blue. Please refer to Appendices 1 and 2 for detailed recommendations.

Actions	Guidance	ST	MT	LT	Responsibility
A1	Prepare a series of Best Practice Guidance Notes[33] (see GRPG02 in Appendix 2) as a companion to the existing guidance, to include the following aspects: a) Scoping Report formats to bring about effective consultation (see SCPRPG03 in Appendix 1) b) Likely evolution of the environment in the absence of the RPGs (see ERRPG08) c) **Development and assessment of alternatives (including the do-nothing/business as usual option and the potential use of GIS modelling techniques) (see ERRPG21–25)** d) Assessment of all of the 'types of effects' including short-term, cumulative, synergistic effects, etc. outlined in the SEA Directive and interrelationships between effects (see ERRPG26) e) Mitigation (including post-mitigation residual impacts) (see ERRPG32–35) and the use of matrices in mitigation (see ERRPG29) f) **Development, implementation and reporting on SEA-related monitoring (see PARPG02–14)** g) **Preparation of SEA Statements (including format, contents, and linkages between SEA and its influence on the RPGs (see ISRPG01–04)** h) Preparation of a clear, concise and relevant Non-Technical Summary in the Environmental Report (see ENRPG01–04 and ISRPG10)	👍			All SAs
A2	**Prepare guidance for plan makers on integration of SEA, AA and plan-making, and how to document changes to a plan such as the RPGs as a consequence of SEA/AA (see ENRPG02, SRPG03, PARPG01, ISRPG03–04, ISRPG12).**		👍		NPWS, EPA, DECLG

33 It is envisaged that a Best Practice Guidance Note would constitute a 5–10 page document outlining how to undertake stages of SEA. This is not intended as an instruction manual, nor a detailed step-by-step process, but rather a guide to the principles that should be adopted in the SEA process.

Actions	Guidance	ST	MT	LT	Responsibility
A3	Prepare detailed guidance on Cumulative Effects Assessment, in combination effects assessment in SEA and AA, and how to integrate SEA and AA in the assessment process (ERRPG26–28).				NPWS, EPA, DECLG

Priority recommendations highlighted in blue seek to address the areas for improvement as identified in Figure 13.

Table 27: Actions for Implementation: Training and Awareness

Actions	Training and Awareness	ST	MT	LT	Responsibility
B1	Develop and provide targeted training to promote integration between SEA and AA for Local Authority and Regional Authority staff (see ISRPG07).	👍			All SAs
B2	Develop targeted training for SEA decision makers (public representatives) and senior management staff, planners, engineers, etc. and key stakeholders to raise awareness of SEA, its responsibilities and benefits.		👍		All SAs
B3	Develop and provide training on the assessment of effects (short-, medium- and long-term, cumulative, synergistic, permanent, temporary, direct, indirect, interrelationships, etc.) including the use of GIS (see ISRPG07)		👍		All SAs
B4	Support the establishment of a National SEA/AA Forum to discuss SEA/AA practices and procedures and monitor the effectiveness of SEA in Ireland (see ISRPG01).		👍		All SAs
B5	Support the establishment of Regional SEA/AA Fora where Local Authorities can share SEA practices; environmental data, approaches, etc. (see ISRPG02).	👍			RAs, LAs & All SAs

Table 28: Actions for Implementation: Data Collation, Provision and Sharing

Actions	Data collation, provision and sharing	ST	MT	LT	Responsibility
C1	Develop a centralised GIS database and register of up-to-date environmental data (see ERRPG15). This should contain legislation, circulars, guidance, etc. relating to SEA/AA/FRA from the SAs. Best Practice examples should be made available and a web-based SEA Portal should be developed with up-to-date mapping.		👍		All SAs
C2	SAs should update their websites with relevant SEA information and include details of SA's role and function (i.e. consultation during the SEA/plan-making process, etc.) (see GRPG08).	👍			All SAs

Table 29: Actions for Implementation: Governance and Legislation

Actions	Governance and Legislation	ST	MT	LT	Responsibility
D1	Establish a national SEA/AA Technical Forum (see ISRPG01) comprising members of the statutory authorities to: a) Promote overall compliance with the requirements of the SEA Directive & Regulations b) Seek to ensure that SEA Statements are prepared and reviewed, mitigation is implemented, monitoring is conducted and reports are reviewed c) Develop and agree a set of standardised key national environmental objectives, targets and indicators (see PARPG02–03)		👍		All SAs
D2	Issue a Circular Note on Article 8 of the SEA Directive; that is, what are the legal implications if SEA is prepared but not adequately 'taken into account' in the plan-making process (see GRPG01)		👍		DECLG
D3	Ensure existing statutory environmental authorities have sufficient resources to engage effectively at key stages of the SEA process (see GRPG03)		👍		All SAs

SA = Statutory Authority; **RA** = Regional Planning Authority; **LA** = Local Authority

7.3 Conclusions

This review aimed to provide evidence on how effective SEAs were in integrating environmental considerations into the RPGs 2010–2022. While all Regional Authorities sought to engage and effectively integrate the findings of SEA into the RPGs, some fundamental elements of the process were not properly addressed or fully utilised, highlighting the need for guidance. Despite this, SEA had a very positive effect on the RPG documents and successfully raised the awareness of environmental pressures or problems in each Region.

The report has highlighted that the EPA plays a major role in the current governance arrangements and the EPA and other Statutory Authorities have influenced the shaping of the SEA and RPGs.

It is clear that SEA influenced the RPG decision-making process, however key areas for improvement identified in the report relate to the need for Best Practice Guidance Notes on many aspects of the SEA process, clarification on the strength of SEA legislative requirements, and training and awareness.

The findings of this study have been incorporated into the 'Review of Effectiveness of SEA in Ireland' prepared by RPS for the Environmental Protection Agency. The recommendations outlined above and the more detailed recommendations in Chapter 7, Appendices 1 and 2 of the main report provide the basis for a significant improvement in the SEA process during the next review of the RPGs and for effective monitoring of the adopted RPGs.

Successful implementation of the recommendations in this report will enhance the effectiveness of the SEA process by improving the assessment of likely significant effects, improving integration of environmental concerns into the RPG-making process and improving governance. This will ensure that regional planning policy documents are sustainable and represent best practice in Ireland, thereby setting a high standard for lower level land use plans and programmes.

References

Border Regional Authority (2004) *Regional Planning Guidelines for the Border Region 2004–2016*.

Border Regional Authority (2010) *Regional Planning Guidelines for the Border Region 2010–2022*.

DECLG (2004) Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment – Guidelines for Regional Authorities and Planning Authorities.

DECLG (15 February 2008) *Appropriate Assessment under Article 6 of the Habitats Directive*. Circular SEA 1/08 & NPWS.

DECLG (2009) *The Planning System and Flood Risk Management – Guidelines for Planning Authorities*.

DECLG (2010) *Best Practice Guidance Note on SEA Transboundary Consultation between Ireland and Northern Ireland*.

DECLG (11 March 2011) *Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities*. Circular NPW 1/10 & PSSP 2/10.

Dublin & Mid-East Regional Authority (2004) *Regional Planning Guidelines Greater Dublin Area 2004–2016*.

Dublin & Mid-East Regional Authority (2010) *Regional Planning Guidelines for the Dublin & Mid-East Region 2010–2022*.

EPA (2009) *GISEA Manual – Draft*. www.epa.ie/downloads/consultation/Updated%20Jan%202010%20Draft_GISEAManual.pdf Accessed 14/06/2011.

EPA (2008) *SEA Process Checklist – Consultation Draft*. www.epa.ie/downloads/advice/ea/SEA%20Process%20Checklist.pdf Accessed 14/06/2011.

EPA, CCC & WRA (2010) *Draft SEA Implementation Manual*. Unpublished. Environmental Protection Agency, Cavan County Council & West Regional Authority.

European Commission (1992) *Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora*.

European Commission (2007) *Directive 2007/60/EC on the assessment and management of flood risks*. http://ec.europa.eu/environment/water/flood_risk/index.htm Accessed 10/06/2011.

Irish Government (2002) The National Spatial Strategy 2002–2020 – People, Places and Potential.

Irish Government (2000) *Planning and Development Act 2000, as amended*.

Irish Government (2004) *European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 S.I. 435*.

Irish Government (2004) *Planning and Development (Strategic Environmental Assessment) Regulations 2004 S.I. 436*.

Irish Government (2008) *Planning and Development (Regional Planning Guidelines) Direction 2008*.

Irish Government (2009) *Planning and Development (Regional Planning Guidelines) Regulations 2009 – S.I. 100*.

Irish Government (2011) *Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011 S.I. 201*.

Irish Government (2011) *Planning and Development (Amendment) Regulations 2011 S.I. 262*.

Midlands Regional Authority (2004) *Regional Planning Guidelines for the Midlands Region 2004–2016*.

Midlands Regional Authority (2010) *Regional Planning Guidelines for the Midlands Region 2010–2022*.

Mid-West Regional Authority (2004) *Regional Planning Guidelines for the Mid-West Region 2004–2016*.

Mid-West Regional Authority (2010) *Regional Planning Guidelines for the Mid-West Region 2010–2022*.

Scottish Government (2011) *Strategic Environmental Assessment – SEA Review* www.scotland.gov.uk/topics/environment/sustainabledevelopment/14587/review Accessed 10/06/2011.

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

South-East Regional Authority (2004) *Regional Planning Guidelines for the South-East Region 2004–2016*.

South-East Regional Authority (2010) *Regional Planning Guidelines for the South-East Region 2010–2022*.

South West Regional Authority (2004) *Regional Planning Guidelines for the South West Region 2004–2016*.

South West Regional Authority (2010) *Regional Planning Guidelines for the South West Region 2010–2022*.

West Regional Authority (2004) *Regional Planning Guidelines for the West Region 2004–2016*.

West Regional Authority (2010) *Regional Planning Guidelines for the West Region 2010–2022*.

Further Reading

Breen, Rachel (2010) *A Preliminary Study on Strategy Environmental Assessment (SEA) Effectiveness in Ireland*. Unpublished

CLG (2010) *Towards a more efficient and effective use of Strategic Environmental Assessment and Sustainability Appraisal in spatial planning*. Communities and Local Government, London.
http://communities.gov.uk/documents/planningandbuilding/pdf/15130101.pdf
Accessed 10/06/2011.

European Commission (2009) *Study concerning the report on the application and effectiveness of the SEA Directive (2001/42/EC)*. European Commission, DG ENV, Denmark.

Acronyms

AA	Appropriate Assessment
ACA	Architectural Conservation Area
BMW	Border, Midland & West
BRA	Border Regional Authority
CFRAMs	Catchment based Flood Risk Assessment & Management Plans
CSO	Central Statistics Office
DAFM	Department of Agriculture, Food & the Marine
DCENR	Department of Communications, Energy and Natural Resources.
DECLG	Department of Environment, Community and Local Government
DEHLG	Department of Environment, Heritage and Local Government (became the DECLG in 2011)
DRA	Dublin Regional Authority
ECJ	European Court of Justice
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
ER	Environmental Report
ESDP	European Spatial Development Perspective
EU	European Union
FDI	Foreign Direct Investment
FRMPs	Flood Risk Management Plans
GDA	Greater Dublin Area
GHG	Greenhouse Gas
GIS	Geographical Information Systems
GSI	Geological Survey Ireland
HDA	Habitats Directive Assessment (see AA)
IBIA	Integrated Biodiversity Impact Assessment
IFI	Inland Fisheries Ireland
IGH	Irish Geological Heritage (IGH Programme)
IPPC	Integrated Pollution Prevention & Control
IROPI	Imperative Reasons of Overriding Public Interest
LA	Local Authority
LAP	Local Area Plan

MERA	Mid-East Regional Authority
MRA	Midlands Regional Authority
MWRA	Mid-West Regional Authority
NDP	National Development Plan
NHA	Natural Heritage Area
NHP	National Heritage Plan
NIEA	Northern Ireland Environment Agency
NPWS	National Parks and Wildlife Service
NSS	National Spatial Strategy
NTS	Non-Technical Summary
OPW	Office of Public Works
OSi	Ordnance Survey of Ireland
PDA	Planning & Development Act 2000, as amended
PM	Particulate Matter
RA	Regional Authority
RAL	Remedial Action List
RBD	River Basin District
RBMP	River Basin Management Plan
RFRA	Regional Flood Risk Assessment
RPGs	Regional Planning Guidelines
SA	Statutory (Environmental) Authority (*i.e. EPA, DECLG, DCENR, NIEA*)
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SEO	Strategic Environmental Objective
SEPA	Scottish Environmental Protection Agency
SERA	South-East Regional Authority
SFRA	Strategic Flood Risk Assessment
S.I.	Statutory Instrument
SWRA	South-West Regional Authority
SPA	Special Protection Area
WRA	West Regional Authority
WES	Wind Energy Strategy
WFD	Water Framework Directive
WWTP	Waste Water Treatment Plant

Appendices

Appendix 1: Recommendations from the RPG Case Studies

The following tables summarise the outcomes of the RPG Case Studies. For a list of questions examined, please refer to Appendix 3 below.

Legend:		
Action Required		👍
Next RPG Review		*
Linking Sections of the ER		⟳
Responsible Authority	SA – Statutory (Environmental) Authority RA – Regional Authority LA – Local Authority	
Actions	ST – Short Term MT – Medium Term LT – Long Term	

Scoping	ST	MT	LT	Responsibility
SCPRPG01 SEA & AA should be integrated from the beginning of the RPG review process.	👍 *			RAs
SCPRPG02 A Scoping meeting should be held with the EPA (as lead Statutory Environmental Authority) on the RPGs given the significance of the document in the planning hierarchy. It would be useful to include the NPWS in Scoping meetings and invite other Statutory Environmental Authorities to attend.	👍 *			RAs, SAs, Other Statutory Bodies and Agencies, Stakeholders, Public, etc.
SCPRPG03 A Best Practice Note on Scoping Reports is required. The format should be sufficient to bring about effective consultation and stimulate the reader's interest (e.g. through the use of questions on environmental pressures or influential documents, etc.).	👍			SAs
SCPRPG04 A Scoping document should be available with the RPG Issues Paper for public consultation at the pre-draft RPG stage. It is useful to consult organisations, authorities and the public early in the Scoping process.	👍 *			RAs

Scoping	ST	MT	LT	Responsibility
SCPRPG05 A wider variety of stakeholders (i.e. in addition to the Statutory Environmental Authorities) such as the Prescribed Bodies (PDA Regulations 2001–2011) should be consulted during the Scoping process (particularly other environmental organisations and interested parties).	👍 *			RAs
SCPRPG06 Where a Scoping Report is included in an Environmental Report the key issues identified during Scoping (including consultation) should be linked to relevant sections in the Environmental Report where they have been addressed. In order to identify the links, a follow-up report/summary should be prepared. This will provide an opportunity to identify where issues have been included. At the very least this element should be provided in the SEA Statement. There should be a clear stocktaking of key issues in the SEA process (from the Scoping Stage through to Assessment of likely significant effects, mitigation measures and monitoring).	👍 *			RAs

Consultation on Draft RPGs & ER	ST	MT	LT	Responsibility
CRPG01 Ensure there is a good level of stakeholder involvement and clear attempts are made to engage with the public throughout the RPG process. Ensure that transboundary consultation is conducted where necessary.	👍 *			RAs, SAs

RPG Description (in the ER)	ST	MT	LT	Responsibility
ERRPG01 Plans and programmes that relate to the RPGs should be classified by relevant environmental receptor (population, human health, flora, etc. as per S.I. 436, 2004) in the Environmental Report. Include a diagram that presents an overview of plans and programmes which will influence the RPGs and which the RPGs will influence in the Environmental Report (again this should be divided into relevant environmental receptors/topics).	👍 *			RAs
ERRPG02 Conflicts or synergies between Regional Planning Guidelines and strategic objectives of other plans and programmes should be highlighted.	👍 *			RAs with advice of SAs
ERRPG03 A summary of Draft RPG Chapters should be included in the Environmental Report. This should provide a comprehensible and concise overview for the reader.	👍 *			RAs

Existing Environment	ST	MT	LT	Responsibility
ERRPG04 Ensure all topics 'scoped in' at the Scoping stage are included in the Environmental Report. It is acknowledged however that it is difficult to 'scope out' environmental topics in a Regional level plan that has potential to significantly affect a wide range of environmental receptors.	👍*			RAs with advice of SAs
ERRPG05 Sufficient consideration must be given to the determination of the level of detail to be considered in a regional level ER (i.e. 'strategic issues'), which is different to the level of detail pertaining to a lower level plan. Again this can be difficult in some instances where specific projects are being considered or where it is difficult to determine the likely impact of indicative policies/objectives etc. on specific Natura 2000 sites, etc.	👍*			RAs with SAs guidance
ERRPG06 Environmental Report baseline data should reflect the key significant environmental resources in the study area, be relevant to the RPG area, up to date and concise.	👍*			RAs
ERRPG07 Sufficient detail should be provided on key interactions between environmental receptors (e.g. water, human health and biodiversity). The likely direct, indirect or other types of interrelationships should also be outlined.[34]	👍*			RAs with advice of SAs
ERRPG08 A Best Practice Note on the 'likely evolution of the environment in the absence of the RPGs' is required.	👍			SAs
ERRPG09 A description of the 'likely evolution of the environment in the absence of the RPGs' should be provided under each 'environmental receptor'. Spatial analysis using GIS mapping may prove useful for this section.	👍*			RAs
ERRPG10 The baseline environment section of the Environmental Report should be accompanied by relevant supporting maps; the use of composite 'sensitivity-type mapping' is particularly useful for cumulative assessment or the assessment of Alternatives (at a later stage in the Environmental Report). Maps should be of sufficient scale to support the text of the Environmental Report.	👍*			RAs

---

34 Poor water quality can have a direct impact on human health. Increased levels of phosphorus in a lake can directly result in excessive growth of vegetation and reduce the levels of oxygen in the water, thereby indirectly threatening fish in the water.

Existing Environment	ST	MT	LT	Responsibility
ERRPG11 A comprehensive description of GIS modelling techniques applied in the assessment/analysis should be included in the Environmental Report. The limitations of any model used should be identified (e.g. based on obtainable environmental data).	👍 *			RAs
ERRPG12 Modelling techniques[35] should be subjected to rigorous analysis to identify key parameters and the likely significant effects of implementing the RPGs. Models are limited to using readily available GIS data. Simple explanations of modelling techniques should be employed.	👍 *			RAs, SAs, 3rd Level Educational Institutions
ERRPG13 If Draft RPGs include overarching policies and objectives which seek to address strategic environmental problems (i.e. sustainable elements) that may not have arisen from the SEA/AA, this should be documented in the Environmental Report.	👍 *			RAs

Technical Difficulties	ST	MT	LT	Responsibility
ERRPG14 Significant gaps/deficiencies in key relevant baseline data should be highlighted. Where feasible, a commitment to addressing them in association with relevant stakeholders should be included.	👍 *			RAs with advice of SAs
ERRPG15 A centralised GIS database and register of up-to-date, relevant and usable environmental data should be established on a national basis. There is a general lack of regional level GIS data in accessible formats, i.e. most information was largely paper-based and this hampered many of the Regional Authorities.	👍	👍	👍	SAs, Govt. Departments, other statutory bodies and agencies

---

35 One example is MOLAND (Monitoring Land Use/Cover Dynamics), a spatial planning tool that comprises macro scale (regional) and micro scale (local) models used for assessing, monitoring and modelling the development of urban and regional environments. For more information please visit: http://moland.jrc.ec.europa.eu/background.htm

Objectives, Targets & Indicators	ST	MT	LT	Responsibility
ERRPG16 Where environmental objectives have been influenced by EU Directives, national legislation, etc. this should be highlighted and categorised by the type of environmental receptor (i.e. water etc.).	👍*			RAs
ERRPG17 There should be a direct connection between the key environmental resource, associated environmental pressures/problems and the 'likely significant environmental effects' identified in the baseline environment section of the Environmental Report, the environmental objectives and the monitoring proposed through indicators and targets.	👍* 🔁			RAs
ERRPG18 Careful consideration should be given to the types of indicators and targets used. It will only be possible to monitor a small number of key/strategic indicators/targets so they must be appropriate. They should focus on the key aspects of the environment for which mitigation measures are proposed as well as significant environmental resources in the Regional Authority area.	👍			RAs with advice of SAs
ERRPG19 Indicators should be categorised into short-, medium- or long-term timescales or prioritised.	👍			RAs
ERRPG20 Sources of key information for targets and indicators should be identified.	👍			RAs

Alternatives	ST	MT	LT	Responsibility
ERRPG21 A Best Practice Note is required on Alternatives (including the do-nothing option). It should include a description of how to develop and assess alternatives and the potential use of GIS modelling techniques.	👍	👍		SAs
ERRPG22 Alternatives should be generated, discussed and assessed in the SEA Environmental Report and AA rather than restricting the assessment to RPG-derived alternatives. It is recommended that a detailed analysis of the chosen alternative is conducted. Clear justification (on environmental grounds) should be provided for the preferred alternative.	👍*			RAs with advice of SAs
ERRPG23 Realistic RPG-related/specific alternatives should be described within acknowledged limitations (e.g. infrastructure capacity). Unrealistic alternatives outside the scope of the RPGs should be avoided.	👍*			RAs with guidance of SAs

Alternatives	ST	MT	LT	Responsibility
ERRPG24 Consideration and discussion on the 'do-nothing alternative' is required.	👍*			RAs with guidance of SAs
ERRPG25 Alternatives should be supported by suitable mapping and, where possible, they should be subject to spatial assessment using GIS.	👍*			RAs

Likely Significant Effects of Implementing the RPGs	ST	MT	LT	Responsibility
ERRPG26 Standard 'criteria' or a Best Practice Note should be developed to guide the determination and assessment of the full range of environmental effects (i.e. cumulative, synergistic impacts, etc.) outlined in the SEA Directive.	👍	👍		SAs
ERRPG27 The methodology for impact prediction should be clearly set out, with reference to standard recognised methodologies where relevant and appropriate.	👍*			RAs
ERRPG28 The full range of likely significant effects should be assessed systematically and presented clearly. This should include short, medium and long, temporary, cumulative, permanent, synergistic, etc. The list of 'likely significant environmental issues' should be summarised in a table with a column that specifies the relevant 'type of effect from the implementation of the RPGs' expected.	👍*			RAs
ERRPG29 A Best Practice Note on the use of Matrices is required. Simple matrix formats should be employed (e.g. block colours) with comments. A summary of key findings (i.e. where 'likely significant effects' require mitigation) should be presented and discussed in the Mitigation section of the Environmental Report.	👍*			SAs guidance
ERRPG30 'Likely significant environmental effects' should be distinguishable from existing known baseline environmental pressures or problems discussed in the baseline section of the Environmental Report.	👍*			RAs
ERRPG31 Where 'likely significant effects' are outlined in an Environmental Report, the recommended change to the Draft RPGs policies and objectives (following consideration of these issues) should be highlighted (in a table) in the Environmental Report.	👍*			RAs

Mitigation Measures	ST	MT	LT	Responsibility
ERRPG32 A Best Practice Note on mitigation (including post-mitigation residual impacts) is required as a variety of approaches are taken. Mitigation must be linked with other relevant plans and programmes (e.g. RBMPs, CFRAMs) in place or due to be implemented.	👍	👍		SAs
ERRPG33 Mitigation proposed should be clearly reflected in the text of the RPGs. AA mitigation should be incorporated into the SEA Environmental Report and RPGs.	👍*			RAs
ERRPG34 Agreements/commitments should be made with other relevant responsible authorities for the implementation of key mitigation measures (if proposed by the Regional Authority). There should also be certainty that the mitigation measures proposed can be achieved/implemented and their effectiveness can be monitored.	👍			RAs (LAs) etc.
ERRPG35 The SEA Environmental Report should include a table that summarises all likely significant effects of implementing the RPGs. It should include a clear link between SEA Environmental Objectives, Mitigation and Monitoring proposals – in effect all key elements/outputs of the SEA process must be linked.	👍* ↻			RAs

Environmental Report & Non-Technical Summary	ST	MT	LT	Responsibility
ENRPG01 Non-Technical Summaries must contain details under every section required by the SEA Directive. While 'SEA technical terms' are referenced, simple unambiguous language should be used.	👍*			RAs
ENRPG02 ER/NTS should include relevant summary tables showing links between SEOs, the likely significant effects, the proposed mitigation in RPGs (including relevant RPG objectives/policies that take the effects into account) and monitoring proposals.	👍* ↻			RAs
ENRPG03 Environmental constraints maps should be included. They should illustrate all constraints on a single map for the Regional Authority area. This can be particularly useful in land use planning, as all data sets and information are provided on one map.	👍*			RAs
ENRPG04 Maps should be of sufficient size/scale with legible legends to reflect the key environmental characteristics and constraints in the Regional Authority area and to enhance the information in the text of the Environmental Report.	👍*			RAs

Amendments to the RPGs Following Consultation	ST	MT	LT	Responsibility
ARPG01 Amended/Final Environmental Reports or Addenda to Environmental Reports that contain proposed 'alterations' to Draft RPGs following consultation (i.e. not 'material amendments' which are subject to further consultation procedures) should be issued to Statutory Environmental Authorities for comment prior to adoption of RPGs.	👍 *			RAs – to issue SAs – responsibility to comment
ARPG02 SEA/AA Screening documents or Amended Environmental Reports outlining alterations to Draft RPGs should be made available for public viewing.	👍 *			RAs – make use of websites

SEA Statement	ST	MT	LT	Responsibility
SRPG01 SEA Statements should be completed as soon as possible following adoption of the RPGs. Key decisions taken by SEA/AA & RPG teams should be documented and a summary of this process should be provided in the SEA Statement. Where possible, the SEA Statement should be issued to Statutory Environmental Authorities with the adopted RPGs.	👍 *			RAs
SRPG02 The SEA Statement should close-off any key aspects highlighted in the SEA Environmental Report and/or consultation. A draft could be incorporated into an appendix of the Environmental Report (available for public consultation at the Draft RPG stage).	👍 *			RAs
SRPG03 The SEA Statement should identify key specific issues raised during consultations and indicate how they were taken into account (and also who they were received from, e.g. SA).	👍 * 🔁			RAs
SRPG04 SEA Statements should include key maps (e.g. consolidated map of environmental sensitivities or alternatives) used during the SEA process.	👍 *			RAs

Post-RPG Adoption including monitoring	ST	MT	LT	Responsibility
PARPG01 Most importantly there must be clear links between all sections of the Environmental Report indicating that all key elements have been integrated into the RPGs. There should be a clear link from one section of the Environmental Report to the next, e.g. what the RPGs are, what influences them and what the RPGs influence, a description of likely significant environmental effects, the future alternatives (including AA alternatives) for the development of the region and the likely significant environmental effects associated with this (and how they interact with each other), mitigation proposed to counteract these effects and monitoring to examine the success of mitigation and implementation of the RPGs, etc.	👍 * ↻			RAs
PARPG02 National monitoring standards should be developed for land use plans. Monitoring should be linked to the hierarchy of relevant plans and programmes (and their objectives) that influence the RPGs.	👍	👍		SAs
PARPG03 A national set of indicators should be agreed upon (ideally already being monitored by other relevant plans and programmes) for use in monitoring programmes.	👍	👍		SAs
PARPG04 Monitoring should be linked to existing monitoring programmes (e.g. RBMP monitoring) and should avoid, unless critical, establishing new monitoring regimes. Where new monitoring (e.g. not already carried out by a Local Authority) is proposed by a Regional Authority, formal procedures for data collection must be developed. Regional Authorities are predominantly reliant on Local Authorities, other bodies and organisations to collect data, i.e. Regional Authority monitoring is based on their monitoring procedures. In many cases Regional Authorities would require notification of breaches in thresholds (e.g. drinking water quality parameters) monitored at a Local Authority level, if the Regional Authority is to involve itself in a 'corrective action'.	👍	👍	👍	RAs, LAs, advice of SAs
PARPG05 More rigorous assessment of monitoring programmes is required, to ensure they are justified and effective, and usable data will be produced.	👍	👍		RAs with advice of SAs
PARPG06 Monitoring proposals should be focused on key aspects emerging from the SEA/AA. A manageable number of (fit for purpose RPG-specific) indicators and targets should be defined for the purposes of monitoring.	👍	👍		RAs with help of SAs

Post-RPG Adoption including monitoring	ST	MT	LT	Responsibility
PARPG07 SEA (including AA) and RPG Implementation monitoring should be combined (this was a recommendation made by the EPA in many of its submissions to the Regional Authorities). Each Regional Authority is required to prepare an 'Annual Report on Implementation of the Regional Planning Guidelines' (Planning and Development Act 2000–2010). All monitoring should be contained in this document and should be made available to the public and Statutory Environmental Authorities etc.	👍	👍		RAs
PARPG08 Monitoring should provide for a 'learning outcome' for SEA/RPG practitioners and decision makers. This has particular relevance when embarking on subsequent RPG Review (including SEA and AA) cycles.	👍	👍	👍	
PARPG09 Monitoring proposals/commitments should be described in detail, outlining monitoring, coordination, implementation, reporting responsibilities.	👍			RAs with advice of SAs
PARPG10 Thresholds/trigger levels should be specified to allow for intervention if unforeseen negative impacts are identified during monitoring. However, guidance on setting thresholds or trigger levels is required. Various limits are set in national environmental legislation and many sectors contribute to the status of a single parameter (e.g. Local Authorities, forestry sector, agricultural sector, waste sector, etc. all have potential to impact on water quality).	👍			RAs with advice of SAs SAs, national government
PARPG11 Timescales within which to meet proposed Targets should be outlined.	👍			RAs
PARPG12 The frequency of reporting on monitoring should be clearly defined. Monitoring frequency should be fit for purpose, with a clear indication of what it will feed into, how it will be used, how it will be presented and whom it will be available to. Provisions should be made for updating the monitoring programme.	👍			RAs
PARPG13 The frequency at which environmental monitoring information will be available should be identified. Key sources of information should be identified, and agreements should be put in place to ensure that the relevant data is provided to the Regional Authority once available.	👍			RAs

Post-RPG Adoption including monitoring	ST	MT	LT	Responsibility
PARPG14 The responsibility for collation of data on indicators and targets should be outlined. New procedures (e.g. at a Local Authority level) for the collection of data should be agreed prior to their inclusion in the monitoring section of the SEA Statement.	👍			RAs/LAs

Appropriate Assessment	ST	MT	LT	Responsibility
AARPG01 AA should guide the relevant aspects and associated interrelationships in the SEA process and be integrated into the SEA process from the beginning of the RPG Review.	👍*			RAs with advice of SAs
AARPG02 Appropriate Assessment should play a key role in informing the inception and development of alternatives and in the assessment of potential impacts on Natura 2000 sites as a result of implementation of proposed alternatives.	👍*			RAs with advice of SAs

Other	ST	MT	LT	Responsibility
ORPG01 Regional Authorities should highlight the 'key regional environmental issues' (identified in RPGs SEA and any monitoring information) in their submissions made to Local Authorities on the preparation of Draft Development Plans and associated SEAs/AAs.	👍	👍	👍	RAs

Appendix 2: RPG Interview Recommendations

The following tables summarise the outcomes of interviews in relation to the influence of SEA and its integration with the RPGs and SEA Governance.

Legend:

Action Required		👍
Next RPG Review		*
Linking Sections of the ER		⟲
Responsible Authority		SA – Statutory (Environmental) Authority RA – Regional Authority LA – Local Authority
Actions		ST – Short Term MT – Medium Term LT – Long Term

Influence of SEA & integration with RPGs (Legislative & Procedural Requirements, Level of Protection and Integration & Improved Understanding of Environmental Issues & Cost and Resource Effectiveness)	ST	MT	LT	Responsibility
ISRPG01 A National SEA/AA Forum should be established in order to discuss SEA/AA practices and procedures, and monitor the effectiveness of SEA/AA in Ireland.	👍			SAs (including NIEA); Heritage Council, An Taisce, etc.; Experts from other Member States; RA/LAs
ISRPG02 Regional SEA/AA Fora should be organised by the Regional Authorities in order to share environmental data, experiences, etc. between Local Authorities in each region.	👍			RAs, SAs, LAs, other stakeholders, decision-makers, etc.
ISRPG03 A Best Practice Note on AA and SEA integration is required. An approach to combining the AA and SEA processes must be explored.	👍 ⟲	👍		SAs with input from various organisations
ISRPG04 Ensure that the Regional Authority has a proactive approach to SEA from the commencement of the RPG review process, ensuring that SEA, RPG and AA teams are integrated. Teams should also be focused on integrating key elements of SEA into the RPGs.	👍 * ⟲			RAs

Influence of SEA & integration with RPGs (Legislative & Procedural Requirements, Level of Protection and Integration & Improved Understanding of Environmental Issues & Cost and Resource Effectiveness)	ST	MT	LT	Responsibility
ISRPG05 Ensure that a qualified project manager is in place throughout the SEA process who can ensure that the SEA contains appropriate detail, is focused and compliant with legislation. Similarly, suitably qualified professionals should be responsible for analysis and evaluation of data.	*			RAs
ISRPG06 Sufficient resources must be made available to Regional Authorities (e.g. staff expertise, GIS) to ensure the process can be effectively carried out, as SEA is not a simple exercise and is challenging given the statutory time constraints in the RPG process.	*	👍		RAs, SAs
ISRPG07 Formal training of Regional and Local Authority staff is required.	👍			SAs, 3rd Level Institutions, Other agencies
ISRPG08 Effective engagement of Elected Members (decision makers), Regional Authority and Local Authority management should be pursued. A concerted effort to engage decision makers is necessary or a critical element of the process falls short.	👍*	👍	👍	RAs with help of SAs
ISRPG09 Consultation at all stages should be maintained as a priority; however, consultation during the Scoping stage should be recognised as being a key aspect/stage of the SEA process. It is important to identify the critical/significant environmental issues early in the process to ensure they are properly identified, assessed and addressed.	👍*			RAs with guidance from SAs & others
ISRPG10 The Non-Technical Summary is a crucial document to engage decision makers and members of the public in the SEA process.	👍*			RAs
ISRPG11 Valuable information/data resources exist within various Local Authority departments and should be utilised through the involvement of multi-disciplinary teams in the SEA/RPG process.	👍*	👍	👍	RAs, LAs
ISRPG12 The method of integrating SEA and AA into the RPGs should be improved, i.e. the RPGs become disjointed when numerous caveats or conditions are included in the latter stages of their development.	👍*			RAs/SAs

SEA Governance	ST	MT	LT	Responsibility
GRPG01 AA is perceived as having a stronger legislative footing than SEA. It is recommended that specific requirements of Article 8 of the SEA Directive[36] are restated and given a stronger emphasis in SEA-related Legislation and Guidance.	👍	👍	👍	SAs, Government
GRPG02 Best Practice examples and a series of Best Practice Notes are required to improve the overall quality of SEA documents and integration of SEA with the RPGs.	👍	👍		SAs
GRPG03 Ensure all Statutory Environmental Authorities are adequately resourced to respond to SEA consultation requests and to engage with the SEA/RPG process.	👍	👍		Government
GRPG04 A more resourced independent body should conduct reviews and provide clear guidance in the SEA procedures to enhance their effectiveness.		👍		Government
GRPG05 The most effective engagement of the Statutory Authority is witnessed at the statutory consultation stages at Scoping; however, governance would appear to be ineffective at the latter stages of SEA (e.g. monitoring). This should be improved.		👍		SAs
GRPG06 SEA Reports are not cross-checked for compliance with SEA legislation (at latter stages) despite the existence of an EPA SEA Checklist.	👍*			RAs, SAs
GRPG07 The EPA's guidance and informative role is crucial to the success of the SEA process and should be supported. The EPA is a key source of environmental data for SEA purposes and the SA had a significant guiding influence on the RPG SEA process and the final RPG.	👍	👍	👍	Central Government, EPA
GRPG08 All SAs should update their websites with relevant SEA information. Include details of role and function of SA consultation during the SEA/plan-making process.	👍			SAs

36 Article 8 of the SEA Directive: *'Decision making – The Environmental Report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure'.*

Appendix 3: Case Study Questions

This Appendix contains the questions examined in each of the RPG Case Studies. The first table outlines the rating applied to each section of the Environmental Report (i.e. score) in the second table.

Rating	Explanation
Best Practice	Represents best practice in current SEA methodology.
	Approaching best practice in current SEA methodology; minor changes could bring it up to best practice standards.
	Good but requires moderate to major changes in some areas to achieve best practice standards.
	Meets requirements but goes no further.
Room for Improvement	Certain issues identified could be Improved.
	To be determined, as process was not complete at the time of the study.

Screening Stage:	Comment	Score (see rating above)	Follow-Up Questions
Was a screening assessment for SEA carried out? If so, does the screening determination clearly state why the SEA is required? If not, is a reason given as to why a screening was not required, i.e. mandatory?			
Score		–	

Appropriate Assessment:	Comment	Score (see rating above)	Follow-Up Questions
If an Appropriate Assessment screening and, where required, full Appropriate Assessment (AA) were carried out, at what point did they commence, i.e. did the AA commence at the same time as SEA Screening, SEA Scoping, during compilation of the Environment Report or once the SEA was completed?			
Score			

Scoping Stage:	Comment	Score (see rating above)	Follow-Up Questions
Who was consulted on the scope of the Environmental Report? (e.g. statutory authorities only, other stakeholders, the public)			
Does the zone of influence of the P/P extend beyond the P/P boundary? If so, was transboundary notification and consultation undertaken with other Member States and adjoining authorities on the scope of the SEA?			
How long was the scoping consultation open for comment?			
Did the proposed scope of the Environmental Report cover all of the topics listed in the Directive and transposing legislation (i.e. biodiversity; population; human health; fauna and flora; water; soils; air quality; climatic factors; material assets; cultural heritage; and landscape)? If not, have reasons for eliminating certain topics from further consideration been documented?			
What form did the scoping notification take? Was it a letter or was a scoping report prepared? Was sufficient detail on the P/P, its contents and the proposed scope of the SEA provided to allow meaningful response by the Statutory Authorities, other stakeholders and the public, where consulted?			
Were scoping meetings/workshops held with (a) any of the Statutory Environmental Authorities, (b) relevant internal departments within the organisation and (c) other relevant statutory and non-statutory organisations and interest groups?			
How many responses were received during the scoping consultation? Did all of the Statutory Authorities respond to the scoping notification? Where information was provided by the Statutory Authorities, what topics did each address?			
Were the responses to the scoping exercises included in either a Final Scoping Report or the Environmental Report? Were issues raised in the scoping consultation responses subsequently addressed in either a Final Scoping Report or in the Environmental Report?			

Scoping Stage:	Comment	Score (see rating above)	Follow-Up Questions
Where an Appropriate Assessment was undertaken in conjunction with the SEA, were any environmental problems, indicators or other issues relevant to the assessment identified that also needed to be considered during the SEA?			
Score			

Consultation on draft P/P and ER:	Comment	Score (see rating above)	Follow-Up Questions
Outside of the legislatively required notice in the newspaper, were the public and other stakeholders notified of the fact that the ER and draft P/P were open for comment through any other media (e.g. radio ads, website, newsletter)?			
How long was the draft P/P and ER consultation period?			
Is it clearly demonstrated how the ER and the opinions expressed by the designated authorities, other stakeholders and the public during consultation were taken into account during preparation of the RPGs?			
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?			
Does it appear that the consultation was carried out in a meaningful way, i.e. were the consultation responses taken seriously and addressed appropriately? Was the P/P able to be changed as a result of consultation or was it too set in stone to allow for meaningful changes to be made?			
Score			

Plan Description:	Comment	Score (see rating above)	Follow-Up Questions
Does the ER provide an outline of the contents and the main objectives of the P/P and has information been provided on the relationship of the P/P with other relevant P/Ps in the ER?			
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?			
Does the ER refer to the sustainability and strategic objectives of the relevant P/P?			
Score			

Existing Environment:	Comment	Score (see rating above)	Follow-Up Questions
Are the relevant aspects of the current state of the environment described as required under the Regulations? (i.e. biodiversity; population; human health; fauna and flora; water; soil; air quality; climatic factors; material assets; cultural heritage; and landscape). Were any additional topics that were not required under the Regulations addressed? List any additional topics.			
Are any existing environmental problems described? Where environmental problems have been described, what did they relate to and have they been put into the context of the P/P?			
Where environmental problems have been described, have mitigation measures been described?			
Is the likely evolution of the existing environment without the implementation of the P/P well described?			
Have any significant gaps in the baseline data been identified? Have alternative data sources been identified where existing baseline data is unavailable?			
Were any difficulties encountered in compiling the required information? Was an explanation given as to how these difficulties were overcome?			

Existing Environment:	Comment	Score (see rating above)	Follow-Up Questions
Was mapping used effectively to display/describe the environmental topics included in the scope of the assessment? For which subject/topic was mapping the most effective way of illustrating the baseline environment and/or potential impacts? What could have been improved?			
What sources of environmental data and/or environmental information systems were used? List key data sources used in the ER.			
Was the baseline information presented relevant to the P/P and the assessment being carried out, or was it information gathering purely for the sake of information gathering?			
Score			

Objectives, Targets and Indicators:	Comment	Score (see rating above)	Follow-Up Questions
Have the environmental protection objectives established at International, European Community or Member State level that are relevant to the P/P been identified? 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?			
Are Objectives, Targets and Indicators used in the SEA? If not, skip this section.			
In relation to environmental targets: (a) have limits or thresholds been established where appropriate; and, (b) have timescales been set where appropriate?			
Is the number of environmental indicators manageable, in terms of time and resources?			
Are the indicators tailored to subject areas over which the competent authority for the P/P has remit? If not, is the data readily available from other sources?			
Score			

Alternatives:	Comment	Score (see rating above)	Follow-Up Questions
Have 'reasonable alternatives' been identified and described?			
Does the SEA describe how the alternatives were selected? Was this determined before the SEA commenced or were the alternatives developed in tandem with the SEA?			
Has clear written justification been given for the choice of the preferred alternative?			
Are the proposed alternatives assessed against the relevant environmental objectives and against each other? Was each alternative considered fully or does there seem to have been a predisposition to selecting a certain alternative?			
Is there evidence of other alternatives being considered because of the SEA process? Is there evidence of any alternatives being eliminated as a result of the SEA?			
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?			
Score			

Likely Significant Effects of the P/P:	Comment	Score (see rating above)	Follow-Up Questions
Are the likely significant effects on the environment comprehensively described, including: positive and negative; short, medium and long term; permanent and temporary; secondary; cumulative; and synergistic?			
Are interrelationships between the likely significant effects on the environment for the individual environmental topic areas described?			
What type of assessment was carried out – objectives-led or baseline-led? Was the assessment baseline-led? If the answer is 'Yes', provide details on how the assessment was undertaken; if the answer is 'No', provide details on the type of assessment carried out (e.g. objectives-led). Include a description on how impacts were predicted.			

Likely Significant Effects of the P/P:	Comment	Score (see rating above)	Follow-Up Questions
Have changes been made to the P/P as a result of the likely significant effects identified? Are they major changes, e.g. a complete reworking of the P/P, or minor changes, e.g. changes to individual words or slight modifications to the preferred alternative? Are the changes commensurate with the impacts the P/P is predicted to have?			
If relevant and possible quantify the following: a) number of new policies included in the P/P as a result of the SEA process; and b) number of new objectives included in the P/P as a result of the SEA process. Also, were there changes to land use zonings in the P/P area as a result of the SEA process and, if so, what were these changes?			
Score			

Mitigation Measures:	Comment	Score (see rating above)	Follow-Up Questions
Have mitigation measures been proposed for all significant adverse effects on the environment of implementing the P/P? Has an explanation been provided where mitigation of significant adverse effects is not proposed? Is the argument given that the P/P is already sustainable?			
Have the proposed mitigation measures been incorporated into the P/P? Is it easy to find where these have been included?			
Have the proposed mitigation measures been linked, where appropriate, to specific relevant significant environmental effects and monitoring proposals?			
Are the mitigation measures proposed within the remit of the statutory authority? If not, is there reasonable certainty that they will be implemented? And has the authority responsible been identified? Is there any follow-up suggested to make sure that these are a) implemented and b) effective? Are these within the competent authority's remit to implement or are they reliant on another body to ensure they are put in place?			
Do the proposed mitigation measures have potential to avoid fully or mitigate the relevant impact(s)? If not, have additional measures been considered?			
Is a description provided of any likely post-mitigation residual impacts?			
Score			

SEA Environmental Monitoring:	Comment	Score (see rating above)	Follow-Up Questions
Has a monitoring programme of significant environmental effects of implementing the P/P been described? Does the monitoring programme allow unforeseen adverse effects to be identified?			
Are responsibilities for carrying out the monitoring programme clearly defined?			
Has the frequency of monitoring been specified in the monitoring programme? Has provision been made to produce regular monitoring reports during the time period of the P/P? Is there evidence that this information will be used to inform the next cycle of planning?			
Does the monitoring programme utilise existing monitoring arrangements where appropriate? Does the monitoring programme address significant gaps identified in the baseline data?			
Have thresholds/trigger levels been assigned that will determine the need for appropriate remedial action?			
Are responsibilities for identifying and responding to unforeseen adverse effects of implementation of the P/P clearly defined?			
Has a link been provided to existing monitoring and response procedures? (i.e. link in the relevant hierarchy of plans)			
Are provisions in place to make the results and interpretation of the monitoring programme available to the Statutory Environmental Authorities and the public?			
Has the recommended monitoring within the Plan area been undertaken?			
Score			

Environmental Report and Non-Technical Summary:	Comment	Score (see rating above)	Follow-Up Questions
Is the Non-Technical Summary concise and easy to understand?			
Does the ER make effective use of maps, tables, figures, etc.?			
Score			

Amendments to the P/P Following Consultation:	Comment	Score (see rating above)	Follow-Up Questions
Have all amendments to the P/P following consultation been screened for SEA and Appropriate Assessment?			
If material amendments to the P/P were identified that would have a likely significant effect on the environment, was a further round of public consultation carried out?			
Have changes to the P/P been made as a result of consultation on the SEA? Are they major changes, e.g. a complete reworking of the P/P? Or minor changes?			
Score			

SEA Statement:	Comment	Score (see rating above)	Follow-Up Questions
Is the SEA Statement clear and concise and does it provide a transparent accounting of how the P/P was developed and the role that consultation and SEA played in its development?			
Does the SEA Statement include specific reference to the changes that were made to the P/P due to the consultation and SEA processes? If 'Yes', does it distinguish where these changes originated from? (public or stakeholders or SEA Team)			
Where the P/P seems to be obviously unsustainable, is it clear from the SEA Statement why this is and why improvements to the P/P can't be made to improve its sustainability?			
Score			

Post-P/P Adopting – Quality and Integration with the P/P:	Comment	Score (see rating above)	Follow-Up Questions
Have environmental considerations been clearly integrated in the P/P preparation and adoption?			
Where the SEA did not influence the plan (i.e. where environmental considerations were not identified in the SEA), was the plan itself considered sustainable?			
Has the integration of the P/P making process and the SEA process been documented, including key stages and decisions?			
Does the SEA or P/P documentation give the feeling that the two processes were carried out alongside each other? Does a regular exchange of information seem to have occurred or was the SEA kept separate to the P/P development process?			
Score			

Summary Conclusion
1) Does the SEA fulfil the legislative/procedural requirements of the SEA Directive?
2) Does the SEA fulfil the Directive's substantive purpose, i.e. high level of protection of the environment, integration of environment into preparation of plans and sustainable development?
3) Did the SEA have indirect effects such as better understanding by planners of environmental issues, or ideas for the next round of planning?
4) Was the SEA process cost- and resource-effective?

P/P refers to a plan or programme subject to SEA legislation.

An Ghníomhaireacht um Chaomhnú Comhshaoil

Is í an Gníomhaireacht um Chaomhnú Comhshaoil (EPA) comhlachta reachtúil a chosnaíonn an comhshaol do mhuintir na tíre go léir. Rialaímid agus déanaimid maoirsiú ar ghníomhaíochtaí a d'fhéadfadh truailliú a chruthú murach sin. Cinntímid go bhfuil eolas cruinn ann ar threochtaí comhshaoil ionas go nglactar aon chéim is gá. Is iad na príomhnithe a bhfuilimid gníomhach leo ná comhshaol na hÉireann a chosaint agus cinntiú go bhfuil forbairt inbhuanaithe.

Is comhlacht poiblí neamhspleách í an Ghníomhaireacht um Chaomhnú Comhshaoil (EPA) a bunaíodh i mí Iúil 1993 faoin Acht fán nGníomhaireacht um Chaomhnú Comhshaoil 1992. Ó thaobh an Rialtais, is í an Roinn Comhshaoil, Pobal agus Rialtais Áitiúil.

ÁR bhFREAGRACHTAÍ

CEADÚNÚ

Bíonn ceadúnais á n-eisiúint againn i gcomhair na nithe seo a leanas chun a chinntiú nach mbíonn astuithe uathu ag cur sláinte an phobail ná an comhshaol i mbaol:

- áiseanna dramhaíola (m.sh., líonadh talún, loisceoirí, stáisiúin aistrithe dramhaíola);
- gníomhaíochtaí tionsclaíocha ar scála mór (m.sh., déantúsaíocht cógaisíochta, déantúsaíocht stroighne, stáisiúin chumhachta);
- diantalmhaíocht;
- úsáid faoi shrian agus scaoileadh smachtaithe Orgánach Géinathraithe (GMO);
- mór-áiseanna stórais peitreail;
- scardadh dramhuisce.

FEIDHMIÚ COMHSHAOIL NÁISIÚNTA

- Stiúradh os cionn 2,000 iniúchadh agus cigireacht de áiseanna a fuair ceadúnas ón nGníomhaireacht gach bliain.
- Maoirsiú freagrachtaí cosanta comhshaoil údarás áitiúla thar sé earnáil – aer, fuaim, dramhaíl, dramhuisce agus caighdeán uisce.
- Obair le húdaráis áitiúla agus leis na Gardaí chun stop a chur le gníomhaíocht mhídhleathach dramhaíola trí comhordú a dhéanamh ar líonra forfheidhmithe náisiúnta, díriú isteach ar chiontóirí, stiúradh fiosrúcháin agus maoirsiú leigheas na bhfadhbanna.
- An dlí a chur orthu siúd a bhriseann dlí comhshaoil agus a dhéanann dochar don chomhshaol mar thoradh ar a ngníomhaíochtaí.

MONATÓIREACHT, ANAILÍS AGUS TUAIRISCIÚ AR AN GCOMHSHAOL

- Monatóireacht ar chaighdeán aeir agus caighdeáin aibhneacha, locha, uiscí taoide agus uiscí talaimh; leibhéil agus sruth aibhneacha a thomhas.
- Tuairisciú neamhspleách chun cabhrú le rialtais náisiúnta agus áitiúla cinntí a dhéanamh.

RIALÚ ASTUITHE GÁIS CEAPTHA TEASA NA HÉIREANN

- Cainníochtú astuithe gáis ceaptha teasa na hÉireann i gcomhthéacs ár dtiomantas Kyoto.
- Cur i bhfeidhm na Treorach um Thrádáil Astuithe, a bhfuil baint aige le hos cionn 100 cuideachta atá ina mór-ghineadóirí dé-ocsaíd charbóin in Éirinn.

TAIGHDE AGUS FORBAIRT COMHSHAOIL

- Taighde ar shaincheisteanna comhshaoil a chomhordú (cosúil le caighdéan aeir agus uisce, athrú aeráide, bithéagsúlacht, teicneolaíochtaí comhshaoil).

MEASÚNÚ STRAITÉISEACH COMHSHAOIL

- Ag déanamh measúnú ar thionchar phleananna agus chláracha ar chomhshaol na hÉireann (cosúil le pleananna bainistíochta dramhaíola agus forbartha).

PLEANÁIL, OIDEACHAS AGUS TREOIR CHOMHSHAOIL

- Treoir a thabhairt don phobal agus do thionscal ar cheisteanna comhshaoil éagsúla (m.sh., iarratais ar cheadúnais, seachaint dramhaíola agus rialacháin chomhshaoil).
- Eolas níos fearr ar an gcomhshaol a scaipeadh (trí cláracha teilifíse comhshaoil agus pacáistí acmhainne do bhunscoileanna agus do mheánscoileanna).

BAINISTÍOCHT DRAMHAÍOLA FHORGHNÍOMHACH

- Cur chun cinn seachaint agus laghdú dramhaíola trí chomhordú An Chláir Náisiúnta um Chosc Dramhaíola, lena n-áirítear cur i bhfeidhm na dTionscnamh Freagrachta Táirgeoirí.
- Cur i bhfeidhm Rialachán ar nós na treoracha maidir le Trealamh Leictreach agus Leictreonach Caite agus le Srianadh Substaintí Guaiseacha agus substaintí a dhéanann ídiú ar an gcrios ózóin.
- Plean Náisiúnta Bainistíochta um Dramhaíl Ghuaiseach a fhorbairt chun dramhaíl ghuaiseach a sheachaint agus a bhainistiú.

STRUCHTÚR NA GNÍOMHAIREACHTA

Bunaíodh an Ghníomhaireacht i 1993 chun comhshaol na hÉireann a chosaint. Tá an eagraíocht á bhainistiú ag Bord lánaimseartha, ar a bhfuil Príomhstiúrthóir agus ceithre Stiúrthóir.

Tá obair na Gníomhaireachta ar siúl trí ceithre Oifig:

- An Oifig Aeráide, Ceadúnaithe agus Úsáide Acmhainní
- An Oifig um Fhorfheidhmiúchán Comhshaoil
- An Oifig um Measúnacht Comhshaoil
- An Oifig Cumarsáide agus Seirbhísí Corparáide

Tá Coiste Comhairleach ag an nGníomhaireacht le cabhrú léi. Tá dáréag ball air agus tagann siad le chéile cúpla uair in aghaidh na bliana le plé a dhéanamh ar cheisteanna ar ábhar imní iad agus le comhairle a thabhairt don Bhord.

ENVIRONMENTAL PROTECTION AGENCY

epa
Environmental Protection Agency
An Ghníomhaireacht um Chaomhnú Comhshaoil