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Our Ref: SCP141102.2

Re. South Western CFRAM Draft Flood Risk Management Plans and associated SEA Environmental Report

Dear Sir /Madam,

The Environmental Protection Agency (EPA) acknowledges your notice, dated 15th July 2016, regarding the series of Flood Risk Management Plans (FRMPs) for the South Western CFRAM Study and welcomes the opportunity to provide further input at this stage of the process.

Please find below the EPA's submission in relation to the Draft Flood Risk Management Plans (the Plans) and SEA Environmental Report (the SEA ER) for the South Western CFRAM. This submission reflects the standard approach adopted for the preparation of the Plans. The focus in this submission is primarily on opportunities to strengthen the Plans and in particular on the implementation, governance and monitoring aspects. Additional observations on the Plans and SEA ERs are provided in Attachment 1. The EPA's previous submission at the SEA scoping stage is also attached and the relevant aspects should also be considered as part of this submission.

OVERVIEW COMMENTS

Ireland as an island is vulnerable to weather extremes and sea-level rise. This vulnerability is evident following recent weather extremes, which are expected to become more frequent over the coming decades.

Climate Change is one of the 7 key Messages in the forthcoming EPA publication *Ireland's Environment 2016 –An Assessment*. The need for urgent action on climate change, including the mitigation and adaptation work necessary to protect communities and infrastructures is a key component of this message. In the context of climate adaptation, preparing for flooding, one of the inevitable consequences of climate change is essential.

The National CFRAM Programme and associated series of Plans, maps and related assessments will contribute significantly to the implementation of a robust, evidence based approach to Ireland's actions to addressing the flood risk and flood related implications of climate change. Significantly, for the first time they will provide the basis of a comprehensive integrated and coordinated approach to flood risk assessment and management in Ireland.

While the Plans will contribute to Ireland's national response to climate adaptation, they will only address part of the challenges relating to adaptation. The requirement to prepare Sectoral Adaptation Plans/ Strategies under the Climate Action and Low Carbon Development Act

2015 will provide the framework by which a more integrated sectoral and local authority approach to climate adaptation will be established. The Adaptation Plans/Strategies will need to reflect, and take into consideration, the CFRAM Plans and any subsequent updates.

The implementation phase for the Plans will need to be coordinated and the responsibilities of key stakeholders clearly set out. Along with OPW, individual local authorities, Electricity Supply Board, Waterways Ireland and Irish Water will have key roles to play at the implementation stage.

SUBSTANCE of SUBMISSION

This submission is addressed under the following headings:

- Methodology and Approach
- Flood Risk Management Methods
- Relationship with the Water Framework Directive
- Linkages with other sectors
- Integration of SEA and HDA in the Plans
- Monitoring, Reporting and Review
- Overall Governance and Implementation

1. Methodology and Approach

We acknowledge the CFRAM Programme involved extensive studies, data and information gathering including modelling. The requirement to review the Preliminary Flood Risk Assessment (PFRA) by 2018 will provide an opportunity for updated data and information on significant flood events since 2011 to be taken into account.

We recognise that this is the first cycle of CFRAM Plans, and future cycles will have a more extensive remit including rural and dispersed flood risk, potential risks of climate change and the identification of critical infrastructure that may be at risk from flood events.

The catchment based model adopted has enabled a more holistic approach to managing flood risk and facilitates the identification and assessment of potential cumulative and in combination effects.

The application of a standardised multi-criteria assessment approach has guided the selection of preferred options. There is, however, a need for national coordinated oversight to ensure that the methodology has been applied and followed through in a consistent manner across the CFRAM series of studies and Plans. This will also contribute to a consistent approach to prioritisation at implementation phase.

While the overall objective of the Plans is to manage flood risk, the need to ensure key aspects of the environment are not compromised in achieving these objectives will also need to be embedded throughout the Plans and associated monitoring. It will be important to ensure the key findings and recommendations of the SEA and HDA are clearly integrated and reflected in the final Plans.

2. Flood Risk Management Methods

The suite of Flood Risk Management Methods considered is comprehensive, covering Flood Prevention, Protection and Preparedness measures. Depending on the specific local circumstances, the measures will have a role to play either individually or in combination in managing significant flood risk. The challenge will be getting the combination of preferred solutions implemented on a prioritised and timely basis.

The Planning System and Flood Risk Management (FRM) Guidelines:

A key mechanism in the context of land use planning and flood risk will be the continued and rigorous implementation of *The Planning System and Flood Risk Management (FRM) Guidelines for Planning Authorities* (DEHLG, OPW 2009). The Guidelines should be implemented on a phased prioritised basis in reviewing existing land use zoning to take account of the CFRAM Plans and associated flood maps.

Local Authority Adaptation Strategies:

In addition to the FRM Guidelines, Local Authority Adaptation Strategies will, when prepared, have a significant role to play in promoting an integrated approach to sustainable development. The recently produced Local Authority Adaptation Strategy Development Guideline (EPA, 2016) sets out a methodology for preparing these strategies including identifying, assessing and prioritising adaptation options as well as implementation, monitoring and evaluation. These strategies will need to take into consideration the Plans. The Adaptation Strategy Guideline should be referenced in the Flood Risk Prevention Methods section of the Plans.

Design Standards aligned with CFRAM Studies

Relevant water related infrastructure, including for example storm-water-overflows and sedimentation ponds, and building design standards, should be reviewed and updated as appropriate to reflect the modelling and risk assessment in the CFRAM Studies. This should be included as a specific measure in the Plans.

Sustainable Urban Drainage Systems (SUDS):

The continued incorporation of Sustainable Urban Drainage Systems (SUDS) in implementing land use plans and in development control, coupled with the implementation of the FRM Guidelines referred to above, will further reduce the potential for flood risk.

Green Infrastructure

The potential for Green/Blue Infrastructure to contribute to flood risk management solutions, while captured to an extent in the measures, should be highlighted as a possible approach to be explored at local authority plan level. This could be relevant for Land Use Plans and for the proposed Local Authority Adaptation Strategies. A number of local authorities have prepared green infrastructure strategies which have been incorporated into development plans. These should be taken into account, where relevant, in the implementation of specific measures. Existing green infrastructure strategies could also be updated, where relevant, to reflect the updated findings and information in the Plans.

Flood Protection

We recognise that individual flood protection measures will be subject to site specific design, and where required, project level assessments. Project design should reflect the relevant Mitigation Actions in the SEA ERs.

Flood Preparedness

The emphasis on Flood Preparedness in the Plans is welcome. Clearly there are a number of forecasting and warning systems in place at EU, national and local authority level, all of which contribute to flood preparedness and resilience.

It is recommended that the development of *CFRAM/Plan Specific Flood Preparedness Strategies* be considered as an action / measure in the Plans. This would guide a coordinated catchment based approach to increased community awareness of, and confidence in, flood forecasting and warning, as well as contributing to individual property and community protection.

3. Relationship with the Water Framework Directive

The Plans should include a more detailed description of the linkages between the Water Framework Directive (WFD) and the Floods Directive and their respective Plans and measures. This could be supplemented by the inclusion of a suitable schematic to set out the interactions at development and implementation stages. This is in keeping with the requirement for coordination between the application of the Flood Directive and the WFD as set out in Article 9 of the Flood Directive. This coordination is relevant at the stages of flood mapping, the development of the first FRMPs, and their respective subsequent reviews.

The preferred measures selected in the Plans should not compromise the requirements of the WFD to protect surface waters, groundwater, coastal and estuarine water resources and their associated habitats and species, including fisheries. Where it is identified that potential likely significant effects on water quality or hydromorphology may arise in implementing the measures, the mitigation measures proposed to ensure WFD objectives are not compromised should, where feasible, be described in more detail. Where the preferred measures are likely to result in channel modifications, the potential impacts on hydromorphology should be assessed in greater detail, including in any future project level assessments arising during implementation.

The Plans, and any subsequent project level assessment(s), should examine the interrelationships between the proposed flood risk management measures and the WFD Programmes of Measures for individual water bodies which may be impacted during implementation of the Plan. Implementation related and project specific environmental monitoring will allow adverse impacts on water bodies to be identified and, where necessary, suitable remedial action to be taken.

4. Linkages with other sectors

The Plans and associated SEAs/HDAs and maps, will be a significant resource for informing the preparation and implementation of land use and relevant sector plans in Ireland.

Of particular importance will be the integration of the relevant measures and associated mapping into the hierarchy of land use plans, including the proposed National Planning Framework, Regional Spatial and Economic Strategies and local authority land use plans. This will ensure a coordinated and integrated approach to avoiding flood risk related issues and associated land use zoning issues.

There would be merit in exploring the potential for linkages between the Department of Housing, Planning, Community and Local Government's MyPlan.ie online resource (land use zoning data) and the CFRAM's flood risk mapping. This has potential to identify re-zoning/de-zoning options for undeveloped zoned areas identified as being at significant risk of flooding.

5. Integration of SEA and HDA in the Plans

The Plans should include a detailed account of how the SEA and HDA processes have influenced and informed their preparation. Recommendations and Mitigation Measures should be clearly described in the Plans and should be incorporated into detailed project specific design.

A summary of alternatives considered and the justification for selection of the preferred approach should also be provided. A strong commitment should be included in the Plans to ensure that, in implementing the Plans, the requirements of the WFD, Habitats Directive and where appropriate, EIA Directive, will be fully complied with during the implementation of the Plans and associated measures and related projects.

Flood Risk Management Mitigation Measures

It is recommended that consideration be given to preparing a standard Manual for Flood Risk Management Mitigation Measures for the full suite of measures likely to be implemented. This could be prepared at a national and/or CFRAM/Plan (UoM) level as appropriate. It should include relevant aspects of environmental topic-specific guidelines. This Manual could be referenced in any tender documentation and would inform the development of detailed design specifications for individual flood management projects incorporating the relevant Mitigation Measures. This could be incorporated into an Environmental Management System (EMS) /Environmental Management Plan (EMP) based approach for the roll out of individual or suites of Plan measures.

Construction Environmental Management Plans (CEMPs)

The requirement for contractors to prepare Construction Environmental Management Plans (CEMPs) is welcome. Greater detail should be provided on the contents of these plans. This includes information on the additional suite of plans required to be prepared for project implementation: Erosion and Sediment Control, Invasive Species Management, Emergency Response, Traffic and Safety Management, Dust and Noise Minimisation and Stakeholder Communication plans.

We also recommend that monitoring measures be incorporated into the CEMP, and as appropriate, EMS/EMP. This should also be captured in the overall Plan/SEA monitoring programme to ensure the Plan is being implemented effectively and in accordance with relevant environmental legislation and obligations.

6. Monitoring, Reporting and Review

The continued role of the Inter-Departmental Flood Policy Coordination Group in monitoring progress on implementing the various measures covered under the Plan will provide an important oversight at national level of progress in implementing the Plans and associated flood risk management measures.

Environmental Monitoring Framework

We recommend that a more detailed section on ‘*Monitoring and Review of the FRMP*’ is included in the final series of Plans. This should at a minimum reflect the details in the Monitoring Framework in the SEA ERs and any proposed HDA-related monitoring. Provisions should also be included for links with project specific monitoring.

Relevant existing national environmental monitoring programmes should be reflected in the Monitoring Framework. WFD related monitoring and relevant aspects of Article 17 Reporting under the Habitats Directive are of relevance in this context.

The Monitoring Framework should be reviewed at regular intervals during implementation, and updated, where necessary, to address any specific issues that arise and any new information/ datasets that becomes available.

Reporting on Plan Implementation / Environmental Monitoring

Detailed provisions for reporting on Plan implementation and related environmental monitoring should be included in the Plans. This should capture implementation at relevant scales: CFRAM level, Unit of Management, Area for Further Assessment and IRR level. The

monitoring should incorporate potential positive and negative, temporary and permanent, and cumulative effects associated with Plan implementation.

We recommend the inclusion of a commitment in the Plans to report on a mid-term basis, at the end of year 3 of the six-year implementation cycle, on the implementation of the Plans and the associated environmental monitoring. This will provide a formal mechanism for review of specific aspects of Plan implementation, including the effectiveness of mitigation measures. It will also signal the need for remedial actions to be introduced where Plan related adverse environmental effects have been identified during implementation.

The inclusion of reporting provisions will also make the Plans more robust and provide for increased accountability and transparency during implementation. The Plan implementation and associated environmental monitoring reports, along with a summary of key progress and findings and relevant data and mapping, should be made available to statutory authorities, key stakeholders and communities.

Plan Review

The requirement to review the Plans on a six yearly cycle is welcomed. The requirements for SEA and HDA will also need to be incorporated into cycle 2 and subsequent Plans. This will be of particular relevance where the updated PFRA identifies additional AFAs to be addressed in subsequent Plans.

7. Overall Governance and Implementation

With 29 Plans and 300 AFAs and associated measures, implementation of the Plans will pose a significant challenge for the OPW and local authorities. To ensure their effective delivery, strong governance structures will need to be put in place that provide for collaboration, coordination and clear designation of responsibilities and accountability. The EPA recommends a new chapter on *Governance and Implementation* be included in each Plan. This should include a description of the governance arrangements and mechanisms to oversee implementation of the Plans and associated measures.

There would be merit in considering preparing an overall national level CFRAM Implementation Programme, reflecting priority measures for implementation at national, CFRAM, FRMP, UoM, AFA and IRR level. Key responsibilities (including lead Department/Authority), priority measures/ combination of measures, estimated cost and timescales could be set out alongside each of the measures in the Plans. This would assist the Inter Departmental Flood Policy Coordination Group and any CFRAM/ UoM level Coordination Implementation Groups established in delivering the Measures. It would also inform reporting obligations to the wider public and to the European Commission in accordance with obligations under the Floods Directive.

Strong commitments to governance and robust implementation structures will provide an element of certainty at a national, regional and local level on the sequence of implementation. Relevant aspects of the approach taken by the Department of Agriculture, Food and the Marine in implementing Food Wise 2025 Environmental Sustainability Actions could be considered. The model set up by the Department of Communications, Climate Action and Environment for the implementation of the Offshore Renewable Energy Development Plan (OREDP) may also be of interest in this regard.

Public Consultation

We acknowledge the proactive approach adopted by the OPW and the CFRAM teams to public consultation and stakeholder engagement at key stages throughout the Programme development. This positive approach to stakeholder engagement should continue at the implementation stage and during subsequent Plan cycles.

OTHER MATTERS

Future Amendments/ Modifications to the Plans

Where amendments to the Draft Plans are proposed, these should be screened for likely significant effects on the environment in accordance SEA Regulations. They should also be screened for the purpose of Habitats Directive Assessment. The SEA and HDAs should be updated to reflect any changes related to the assessment. Where additional mitigation is proposed this should be reflected in the updated Plans.

SEA Statement – “Information on the Decision”

Following adoption of the respective Plans, an SEA Statement should be prepared for each Plan that summarises the following:

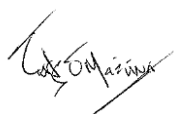
- How environmental considerations have been integrated into the Plan;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

A copy of the SEA Statement should be sent to any environmental authority consulted during the SEA process.

The EPA again welcomes the opportunity to comment at this stage of the CFRAM process. We look forward to working with the OPW and key stakeholders, where appropriate, during the implementation phase through provision of relevant evidence through our water monitoring programmes and our relevant water, climate and sustainability related research and guidance.

Should you have any queries or require further information in relation to the above please contact the undersigned. I would be grateful if an acknowledgement of receipt of this submission could be sent electronically to the following address: sea@epa.ie.

Yours sincerely



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ATTACHMENT 1 – ADDITIONAL OBSERVATIONS ON CFRAM PLANS

A - GENERAL COMMENTS ON PLANS

Duration of Plan & Timescales

Each Plan should include in the title the timescale over which the Plans will be operational.

Summary of key Findings of SEA and Habitats Directive Assessment

Each Plan should include a summary description of the key findings, including recommendations and mitigation measures, from the SEA and HDA. A summary should also be provided showing how these have been incorporated in the Plans.

B - GENERAL COMMENTS ON THE SEA ERs

General comments on the SEA Environmental Reports (the SEA ERs) are provided below. The issues raised should be taken into account prior to finalisation of the Flood Risk Management Plans (the Plans) and the SEA ERs.

SEA ENVIRONMENTAL REPORT (ER)

Environmental Report

The SEA ERs for all Plans should include the information set out in Annex I (a) to (j) of the SEA Directive. The full range of effects on the environment should be assessed and reported on.

The non-technical summary (NTS) should reflect the information required under Annex II of the SEA Directive. Suitable maps and Figures and summary tables should be included as appropriate.

Scope of SEA

Where SEA-related environmental topics are scoped out of the assessment, this should be explained along with the relevant justification.

Baseline Environment Considerations

The baseline environment descriptions should reflect the most recently available environmental monitoring data and published reports. The date(s) of the data used should be clearly stated.

The EPA's publication *Ireland's Environment 2016 –An Assessment* is due to be published shortly. The SEA ERs should reflect the relevant updated information in this report. The Chapters on Nature, Water, Climate, Agriculture and Environmental Challenges and Emerging Issues will be of particular relevance to the Plans.

As this is the first cycle of Plans, continuing to generate relevant up-to-date data will be an important element of evidence gathering during on-going implementation and subsequent plan reviews. As new information and monitoring data becomes available during implementation, including through the Environmental Monitoring Framework and Preliminary Flood Risk Assessment review, this should be integrated, where relevant, to inform the on-going implementation of the Plans.

The recommended interim review of implementation and associated monitoring at mid-plan cycle stage, as proposed in the main submission, will provide a mechanism to take significant new data into account.

Flood and Environmental related Data and Information

We recognise that the Plans have been prepared and associated AFAs determined, taking into account available flood risk data up to 2011/2012 and to a lesser extent more recent historical flooding. The Plans and SEA ERs should include and consider, where appropriate, the most recently available information on flooding within the individual Plan areas.

WFD - Catchments Website and Flood Maps

EPA's recently launched website [catchments.ie](https://www.catchments.ie/) provides comprehensive GIS based data and information resource on Risk, Water Quality, Environmental Pressures, Protected Areas, and Susceptibility. See <https://www.catchments.ie/>

This information should be taken into account particularly in the detailed design of project level water related mitigation measures. This is with a view to ensuring the implementation of the Plans does not compromise the overall objectives of the WFD.

There would be merits in considering integrating, where possible, the relevant catchments.ie map-based information with the OPW's CFRAM generated series of flood related mapped information, including Flood extent, Flood zone, Flood depth, Flood velocity and Flood hazard.

This could become a very useful tool in developing water body specific mitigation measures. It could also provide a framework against which the impacts of implementation of individual and combinations of flood risk management related projects, and the effectiveness of project specific mitigation measures, could be monitored.

In addition, it would assist in delivering on the requirement, under Article 9 of the Floods Directive, for coordination between the application of the Flood and WFD Directives.

Existing Environmental Problems

In describing the key environmental characteristics of the Plan area, where relevant, a description of existing environmental problems associated with specific topics should be included.

Evolution of the environment without implementation of the Plan

For each environmental topic included within the scope of the assessment, a description should be provided on the evolution of the specific topic in the absence of the Plan.

Data Gaps and Technical Deficiencies

Where data gaps or technical deficiencies have been encountered during the SEA process, these should be highlighted along with the implications for the Plan and the SEA. Where relevant, recommendations should be put forward to address specific aspects identified either prior to implementation or at the project level assessment stage.

Alternatives

In considering options for individual AFAs, it should be ensured the selection of preferred options is suitably justified with reference to the relevant Environmental Objectives and the Multi Criteria Analysis (MCA) scores. Where the preferred MCA option is not selected, clear justification should be provided for the selection of the preferred alternative.

Effects on the Environment

The overall positive aspects of the Plans to population and communities should be highlighted in both the SEA ERs and in the Plans. This should also be captured in the associated Plan implementation and environmental related monitoring and associated reporting.

Cumulative Effects

Where there is potential for significant cumulative negative effects associated with implementation of the Plans, this should be acknowledged in the SEA ERs and also reflected in the Plans. This is of particular relevance in the context of water quality and biodiversity including fisheries.

The mitigation measures proposed should also seek to address, where possible, potential catchment/sub catchment level negative cumulative effects. This could for example include phasing of proposed measures and related construction and /or environmental enhancement.

Wider Biodiversity-related aspects

The potential impacts of the Plans on wider biodiversity including fisheries should be considered.

Relationship with Other Plans/Programmes

It would be useful to clarify the extent to which flood prevention options such as re-zoning or de-zoning existing undeveloped local authority zoned lands at high risk of flooding has been considered.

Reference should be included to a number of key relevant national and sectoral plans/programmes, some of which are in preparation and will be finalised during the lifetime of the Plans. These include:

- National Planning Framework (DHPCLG, to commence)
- Regional Spatial and Economic Strategies (Regional Assemblies, to commence)
- 2nd Cycle of River Basin Management Planning (DHPCLG, in preparation)
- Forestry and Freshwater Pearl Mussel Plan (DAFM, in preparation)
- Arterial Drainage Maintenance Activities 2016-2021 (OPW, in preparation)
- Irish Water's Capital Investment Plan,
- Irish Water's Water Services Strategic Plan

Mitigation Measures

Residual effects

The assessment of likely significant effects indicates that, in a number of instances, the preferred options selected have associated negative environmental effects. While it is recognised that mitigation is proposed, in the case of some AFA's, the assessments indicate that residual adverse environmental effects will remain, though less significant.

It is acknowledged that more detailed assessments will be required at the options development and project level stages, which will determine more specific details on mitigation. Notwithstanding this, where significant adverse environmental impacts are identified for the preferred options, where possible, detailed descriptions of Plan-level mitigation measures should be provided. These should provide more certainty on the effectiveness of the mitigation measures to prevent, reduce and as fully as possible offset any significant adverse effects, including residual effects, on the environment during Plan implementation.

Protection of important biodiversity features

The Plans and SEA ERs should promote a standardised approach to the application of appropriate buffer zones between features of biodiversity and proposed projects. The specific details should be considered at project level assessment stages (including EIA and Habitats Directive). Where the application of buffer zones is being considered, the NPWS and Inland Fisheries Ireland should be consulted.

Enhancement Opportunities

Where opportunities exist for environment enhancement, these should be maximised during project specific design and implementation. These should be developed in consultation with the relevant statutory authorities, including as appropriate, NPWS, Inland Fisheries and relevant local community groups, and the resulting positive effects should be monitored and reported on.

SEA related monitoring

The proposed Monitoring Framework should incorporate trigger levels for specific environmental aspects which would determine when remedial actions would need to be implemented in response to adverse effects identified. These should take into account relevant environmental objectives.

This approach should also be reflected at project level environmental monitoring. The Construction Environmental Management Plans (CEMPs) required to be prepared by contractors, and the suggested Environmental Management System (EMS) and associated Environmental Management Plans (EMPs) based approach, would need to reflect the relevant trigger levels for remedial action for specific environmental topics.

Monitoring of effectiveness of mitigation

Monitoring of the effectiveness of mitigation measures required to be put in place should be captured in the overall Monitoring Framework.

HABITATS DIRECTIVE ASSESSMENT

The relevant key findings and recommendations in the HDA should be incorporated into the SEA ERs and the Plans. There should be consistency between the findings of the biodiversity, flora and fauna elements and related environmental aspects, such as water, of the SEA and the HDA findings.

Greater certainty should be provided to demonstrate that the flood management measures proposed, along with relevant mitigation, where required, will not adversely affect the integrity of European sites.

Where HDA related monitoring is proposed, this should also be reflected in the overall Monitoring Framework for the Plans. This should also include cumulative/ in combination effects and the effectiveness of the mitigation measures proposed.

The terminology used in relation to the assessment process, and the associated stages and outputs, should reflect the terminology in the European Communities (Birds and Habitats) Regulations 2011.

C - ADDITIONAL TOPIC SPECIFIC COMMENTS

Hydrometric and Hydromorphology Considerations

Hydrometric Gauging Stations

For all UoMs covered by the CFRAM Plan Areas, a prioritised programme of installation of proposed additional gauging stations should be coordinated with the EPA via the National Hydrometric Working Group.

The additional gauges will provide more comprehensive hydrometric data, which will in turn inform more evidence based assessments and modelling along with increased certainty in on-going flood risk assessment and review of measures.

Implications of preferred options on hydromorphology

Hydromorphology is a particularly important consideration, given that it is likely to be one of the elements most impacted by individual proposals. Significant changes in hydromorphology can in turn affect the ecological status of a water body. While the Plans indicate whether channels are currently altered, consideration should also be given to the implications of hydromorphology related impacts on water bodies resulting from the preferred options. Given that many of the projects are located in urban areas, it is recognised that channels may already be significantly modified. Where this is the case, this should be reflected in the Plans and SEA ERs.

It should be clarified whether the preferred options/measures will introduce additional channel modifications, and what these modifications (and associated environmental implications) would be. In the absence of formal assessment criteria, it is important that the hydromorphological impact is considered and assessed in some way, e.g. the % change in channel modification or coastal modification as a result of the preferred options. This aspect should also be considered, where relevant, at project level assessment stage.

The hydrological regime is an important quality element in the process of identifying and designating 'Heavily Modified Water Bodies'. The impacts of the selected options/measures on the flow regime should be described and assessed. A requirement for more detailed hydrological assessments, where relevant, should be included for any future EIAs arising out of implementing the Plans. This would provide greater clarity on how the options/measures will align with the WFD objectives. In particular, the impacts on achieving the WFD Objectives, water quality and the potential to prevent impact on assets such as WWTPs or industrial sites will be improved upon.

For information the EPA Catchment Science and Management Unit is developing a fluvial geomorphological assessment that will provide an understanding of the fluvial geomorphological condition of rivers, identify morphological pressures and the response of the river to these pressures. This will address the hydromorphological component of characterisation under Article 5 of the Water Framework Directive. This fluvial geomorphological assessment has the potential to inform the designation of WFD Heavily Modified Water Bodies.

Water-related Mitigation Measures

The key potential impacts of the proposed flood management measures on achievement of WFD objectives are hydromorphological (discussed above), which in turn can impact on the ecology. These include increased sediment due to structural measures; increased sediment due to increased channel maintenance and dispersal of invasive species

Increased sediment due to structural measures

The mitigation measures described mostly relate to short term impacts on water quality (e.g. excessive fine sediment entering the river during construction). The mitigation measures should address in more detail the potential long term effects of increased sediment on the fluvial geomorphological conditions which are needed to support habitats which in turn, can impact the overall WFD ecological status. If this issue is not considered to be a significant threat, this should be stated and reasons given.

Increased sediment due to increased channel maintenance

The Plans should address the potential for increased sediment in receiving water bodies during on-going channel maintenance activities arising out of any preferred options/measures. The potential environmental impacts and associated possible mitigation measures should be described. Where other key plans/programmes address these aspects, this should be discussed in further detail in the Plans.

Dispersal of invasive species

The Invasive Species Management plans required under the Construction Environmental Management Plans should cover both construction and maintenance-related activities. This is particularly relevant for species such as Himalayan balsam and Japanese knotweed. This is important given the environmental implications of invasive species on both water quality and biodiversity.

Protection of Critical Service Infrastructure

The SEA ERs and Plans should emphasise the requirements for the protection of existing and proposed critical service infrastructure (wastewater, waste, drinking water, electricity etc.) from risk of flooding. Where relevant, greater detail could be provided on the extent to which storm water and combined sewer overflow infrastructure are considered in the Plans. This is in terms of potential water quality and related human health and ecological impacts arising from flood events affecting the sewer network.

A clear commitment is required to protect key critical service infrastructure in implementing the Plans. Where particular Water Treatment Plants or Waste Water Treatment Plants are at significant flood risk, or are situated near environmentally sensitive receptors which may be significantly impacted by flooding, these areas should be highlighted and specific mitigation measures considered, where appropriate.

Information on historic flooding of treatment plants would also be useful to consider in relation to options and measures selection. Irish Water should be consulted to obtain information on historical flooding of drinking water and wastewater treatment plants where available.

The Plans should acknowledge the environmental, financial and social implications associated with restoring flood impacted treatment plants. The Plans should clearly acknowledge the need for specific measures to prevent reoccurrences of flooding to be implemented in partnership with other relevant stakeholders, in particular Irish Water. As part of the Water Safety Planning process being implemented by Irish Water, one of the hazards considered relates to identification of risk of flooding of water treatment plants.