



SEA Statement

September 2008

Enniscorthy Town & Environs Development Plan 2008-2014

Adopted 14th April 2008



A joint Plan by Wexford County Council & Enniscorthy Town Council

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Section 1. SEA Statement for the Enniscorthy Town & Environs Development Plan 2008-2014

The Enniscorthy Town & Environs Plan was adopted by Enniscorthy Town Council on the 21st Feb 2008 and Wexford County Council on the 14th April 2008, in accordance with S.I. no. 436 of 2004 Planning and Development (Strategic Environmental Assessment) Regulations 2004 (articles 14I and 14J), the Planning Authority is required to prepare a SEA Statement as soon as may be following the making of the Plan. It is not a statutory requirement at Draft Plan stage.

The SEA statement includes a summary of the following information:

1. How environmental considerations have been integrated into the Plan.
2. How;
 - i. the environmental report prepared pursuant to article 14B
 - ii. submissions and observations made to the planning authority in response to a notice under section 20(3) of the Act, and
 - iii. any consultations under article 14F have been taken into account during the preparation of the plan.
3. The reasons for choosing the plan as adopted, in the light of other reasonable alternatives dealt with.
4. The measures decided upon to monitor, in accordance with article 14J, the significant environmental effects of implementation of the plan.

1.1 Introduction to SEA

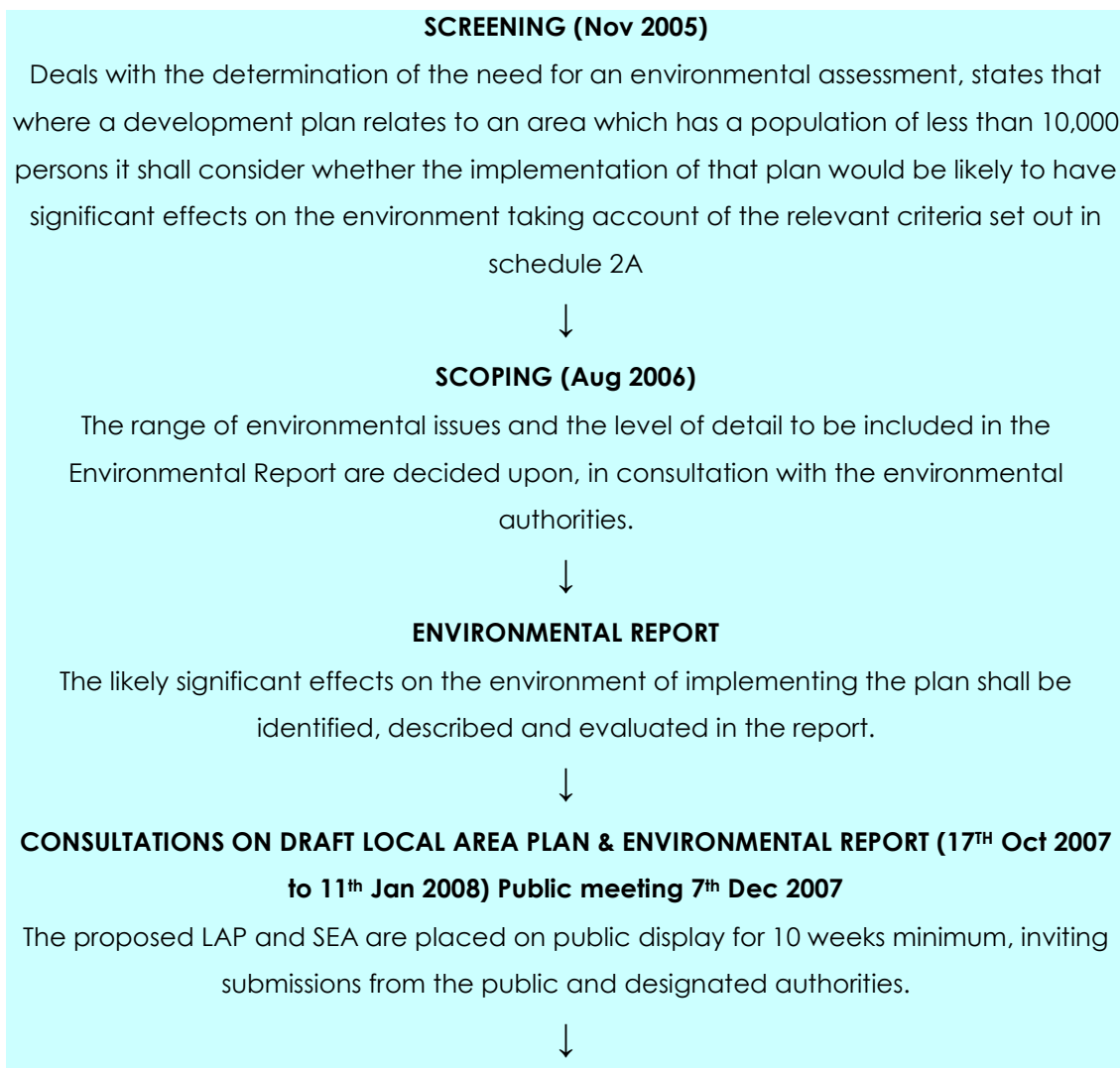
SEA is a formal, systematic evaluation of the likely significant environmental effects of implementing a plan or programme, before a decision is made to adopt the plan or programme. SEA in Ireland is based on *Directive 2001/42/EC (Assessment of the Effects of Certain Plans and Programmes on the Environment)*, more commonly known as the 'SEA Directive'. The main objective of the SEA Directive is to "provide for a high level of protection for 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."

Directive 2001/42/EC came into force in Ireland during July 2004. The Directive has been transposed into Irish Law through two sets of Regulations as set out hereunder;

- *European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. 435 of 2004)*; and
- *Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. 436 of 2004)*.

1.2 Summary of SEA Process

The SEA was prepared in tandem with the Draft Enniscorthy Town & Environs Plan. The SEA process can be illustrated as follows:



MANAGER'S REPORT

The manager's report sets out proposed amendments to the Draft Plan and SEA where appropriate.



SEA STATEMENT AND ADOPTED PLAN (adopted 14th April 08)

Report on how environmental considerations and consultations have been incorporated within the plan.



IMPLEMENTATION OF THE PLAN (next 6 years)

Monitoring the significant environmental effects of implementation of the LAP.

There are four main requirements of the SEA Regulations and these include;

1. The preparation of an Environmental Report, where the likely significant environmental effects of the plan are identified and evaluated. The Environmental Report is the key document in the SEA process and will summarise the likely significant environmental effects and mitigation measures to minimise any adverse impacts.
2. Consultation with the public, environmental authorities, and any EU Member State affected, on the Environmental Report and draft plan.
3. Consideration of the findings in the Environmental Report and the outcome of the consultations in deciding whether to adopt or modify the draft plan
4. Publicising the decision on adoption of the plan and how the SEA influenced the outcome.

1.3 Purpose of Statement

The main purpose of the SEA Statement is to provide information on the decision-making process and to document how environmental considerations, the views of consultees and the recommendations of the Environmental Report have been taken into account in the adopted Plan. It illustrates how decisions were taken, making the process more transparent. It must be made available to the public to accompany the adopted Plan.

The SEA Statement includes the following information:

1. Summary of how environmental considerations have been integrated into the Plan;

2. Summary of how the Environmental Report has been taken into account;
3. How consultation responses have been taken into account;
4. Reasons for choosing the Plan, in the light of other reasonable alternatives dealt with;
5. Measures that are to be undertaken to monitor the significant environmental effects of implementing the Plan.

1.4 Influence of the SEA Process – during plan preparation

Key Influence of SEA:

The process has led to an increased awareness among Planners of the potential environmental impacts (both positive and negative) associated with policies, objectives and zoning of a land-use plan. This indirectly influenced decisions on planning policy therefore improving the Plan.

1.5 Influence of Environmental Report

The recommendations made in the Environmental Report (July 2005) have been assessed and dealt with in a similar way to other consultations made in relation to the Plan. The majority of the issues raised had already been taken into account in the Draft Plan. A selection of the key recommendations and responses are outlined in the following table:

Section 2. Public Consultation

The initial public notice of the review of the Enniscorthy Plan incorporating a Strategic Environmental process was placed in the papers on the 9th Nov 2005 with a public consultation period of 8 weeks ending on the 5th January 2006. A public meeting was also held at the Kilcannon Garden Centre/Conference Centre on Thursday the 7th day of December 2006.

A draft Environmental Report was prepared for the Draft Enniscorthy Town & Environs Development Plan in October 2007. The Plan was then finalised, following a public consultation period of 12 weeks, from the 17th Oct 2007 until 11th January 2008 and a final Environmental Report on the amended Plan was also be prepared.

2.1 Consultation with Environmental Authorities

During the course of the plan review and SEA process the designated SEA Environmental Authorities were consulted with;

- Environmental Protection Agency
- Department of Communications, Marine and Natural Resources
- Department of Environment, Heritage and Local Government

Further consultation on the Environmental Report of the Draft Enniscorthy Town & Environs Plan 2007-2013 was held and their recommendations taken into consideration.

2.2 Initial Public Consultation

At the beginning of the Plan review process a newspaper advertisement advised the public of the commencement of the plan making process inviting submissions. An initial public meeting was held during this period which was held on the 9 November 2004. The issues raised by the public which were considered as part of the Plan/SEA process are as follows:

These issues were fully considered in the formulation of the plan strategy and the environmental issues in the SEA.

2.3 Scoping Consultation

In accordance with the Planning and Development (SEA) Regulations 2004, designated environmental authorities must be consulted in relation to the scope and level of detail to be included in the Environmental Report. Accordingly, the following departments were consulted: Department of the Environment, Heritage and Local Government, Environmental Protection Agency, Department of Communications, Marine and Natural resources. Submissions received by these departments were fully considered in the environmental report and reinforced the identification of the key environmental issues of the plan.

At the scoping stage an SEA meeting took place with EPA in their Cork Office on the 20th March 2007. The level of the scope of the plan and level of detail to be included was discussed. Discussions with the OPW regarding flooding issues in Enniscorthy also took place along with receiving detailed written comments. The Department of Environment, Heritage, & Local Government detailed their scoping comments in a letter.

2.4 Consultation on Draft Plan

In accordance with the statutory requirements the Draft Plan and Environmental report were available for inspection from 17th Oct 2007 to 11th Jan 2008 at the following locations;

- Enniscorthy Town Council, Market Square, Enniscorthy
- Enniscorthy Area Office, Old Dublin Road, Enniscorthy
- Enniscorthy Library, Lymington Road, Enniscorthy
- Planning Reception, Planning Department, Wexford County Council at County Hall

Notices advertising the public consultation period and inviting members of the public for written comments and submission were placed in the local papers.

The environmental authorities were sent a copy of the Draft Enniscorthy Town and Environs Development Plan and Environmental report at the start of the consultation period and written submissions were requested. Following the consultation period, the submissions and comments submitted were compiled and reviewed. A Report on the

submissions received was produced outlining responses to the key issues raised and changes to the Plan where necessary. This was presented to the Elected Members in both Local Authorities.

2.5 Summary of Public consultation

A selection of the key issues raised during the public consultation period and the proposed change to the Plan are outlined in the following table;

Issues Raised	Response/Plan Change
<p>Rivers/riparian zone protection</p> <p>The Eastern Regional Fisheries Board acknowledge that the lands bordering watercourses have been zoned as open space and amenity. They wish this designation to be extended on the River Urrin to the Town Development Boundary. A number of general concerns are expressed regarding developments bordering watercourses with suggestions for ameliorating the effects of development. The Board also notes the effects of abstraction from the River Slaney at Carlow and the knock-on effects for County Wexford chiefly that there will be a lower level of dilution for pollutants / discharge.</p>	<p>The lands bordering most of the salmonid watercourses have been zoned as open space & amenity. However the Urrin, north of Bloody Bridge has been zoned Residential. To protect riparian zones it is imperative that an adequate buffer zone (minimum 5-10m back from riverbank) is maintained along the watercourses.</p> <p>Change to zoning map at Lyre/Greenville, to provide 10m buffer zone either side of the river.</p>
<p>Roads/circulation</p> <p>The NRA state that major works are ongoing on the major routes serving Enniscorthy. The NRA recommends that particular care is exercised when zoning lands where the exact route of the Enniscorthy bypass has yet to be determined and that the capacity of existing national roads are protected.</p> <p>1) The NRA suggests that additional traffic created by development should be catered for within the framework of the existing network rather than overloading the national road network. The NRA believes this principle has not been considered at particular locations.</p> <p>2) The NRA express serious concerns that the land zoning, particularly Zone 3, may have an adverse effect on the planned interchanges.</p> <p>3) It is recommended that all objectives and policies require developers to design transport networks at the earliest stages of planning developments and that applications should include an appropriate transport assessment. The NRA cite several of their publications to provide guidance and offer to meet with the Planning Authority to discuss solutions.</p>	<p>It is a primary goal of the plan to develop a safer, more efficient and integrated transport system within Enniscorthy, with improvements to the road network, the promotion of other forms of transport including public transport, cycle ways and to create a pedestrian friendly environment. An improvement in the environmental quality of the town is dependent on the reorganisation of the town's system of traffic circulation. Car usage should be reduced through the promotion of other modes of transport, such as cycling, walking and public transport. A roads objective map in conjunction with the zoning objectives maps, has been drawn up to improve circulation within the town to benefit both car users and cyclists and will reduce congestion within the town centre.</p>
<p>Spatial Policy</p> <p>The Spatial Policy Section of the Department of Environment Heritage & Local Government makes a detailed submission with regard to the conservation of nature and built heritage. The department feels the draft is intended to address the needs of the town and environs in a sustainable way. It seeks to provide in a plan led way for the balanced development of both the town and environs. It also contains a strong</p>	<p>The Planning Authority welcomes this submission from the Spatial Policy Section of the Department of the Environment, Heritage and Local Government. Any proposed future development will be reliant on the availability of adequate sewerage servicing and networks.</p>

<p>focus on quality of life issues and proposes in tandem with the zoning for development, the provision of educational and social infrastructure for which the Councils are to be commended.</p> <p>He suggests that the following areas are reviewed:</p> <ul style="list-style-type: none"> *Interface with other policy matters (esp. Water Framework Directive) *Zoning and Settlement Strategy inc. potential for phasing lands for development *Flood risk and mapping *Process for monitoring and implementation *Presentation 	
<p>Flooding</p> <p>Conor McDermott refers to Section 3.8 of the Plan and notes that all development within Enniscorthy should give consideration to the proposed flood alleviation scheme. He recommends that Policy SW11 be amended so that floor levels shall be 300mm above the 100 year flood level and that in areas under the influence of the tide the 200 year event should be considered.</p> <p>The Engineering submission from Timothy Joyce of the OPW makes provides a map of the 100 year flood as the situation stands and also the 100 year flood post the flood alleviation scheme.</p>	<p>Locating development in an area at risk from flooding can lead to property damage, human stress and hardship, problems obtaining property insurance and consequential demands for the expenditure of Local Authority or Central Government resources on flood protection works.</p> <p>Development should not itself be subject to an inappropriate risk of flooding nor should it cause or exacerbate such a risk at other locations. Policies regarding flooding contained in section 3.8 of Draft Plan.</p> <p>Add policy into Section 3.8 so that all development within Enniscorthy should give consideration to the proposed flood alleviation scheme.</p> <p>Amend Policy SW11 so that floor levels are 300mm above the 100 year flood level and that in area under the influence of the tide the 200 year event should be considered.</p> <p>Minor amendments to zoning map along river bank to take account of the 100year flood plain.</p>
<p>Spatial Policy</p> <p>The Spatial Policy Section of the Department of Environment Heritage & Local Government makes a detailed submission with regard to the conservation of nature and built heritage. The department feels the draft is intended to address the needs of the town and environs in a sustainable way. It seeks to provide in a plan led way for the balanced development of the both town and environs. It also contains a strong focus on quality of life issues and proposes in tandem with the zoning for development the provision of educational and social infrastructure for which the Councils are to be commended. It also welcomes the commitment from the joint councils to the protection of the architectural heritage of the town as set out in the Draft Plan.</p>	<p>The Planning Authority welcomes the submission from the DOEHLG and notes the overall comments. There are a number of issues outlined which could be amended as follows;</p> <p>HS 9 Co-ordinate and facilitate the release of new residential development, giving priority to locations that enhance the existing urban structure and which can be integrated into existing public services.</p> <p>Development of Greenfield sites, will therefore be encouraged to occur in a orderly manner with the lands nearest the town centre being developed first.</p> <p>Amend Section 9.3 to include for an appropriate assessment of any works located within the SAC and pNHA sites.</p>

Section 3. Reasons for choosing the plan as adopted

The SEA Statement is required for adopting the Enniscorthy Town & Environs Development Plan 2008-2014 in light of the reasonable alternatives considered. The Environmental Report has set out the alternatives considered, and reasons for selection of the preferred option.

3.1 Alternatives considered

The aim of the consideration of alternatives is to look at differing ways to achieve a stated objective or intention.

Option A- Diffusion

Enniscorthy could select a strategy where population expansion would no longer be concentrated in the town itself. Instead expansion might be absorbed by surrounding villages and settlements such as Monageer, Marshalstown, Caim, Tomnalossett and others. These villages might develop as satellite communities while the existing town edge would remain essentially as it is, without pressure for further extension. There are two reasons however for not pursuing such a strategy. Firstly the existing town is still below the threshold of size above which it would support the development of internal local public transport or the development of critical mass of shops to satisfy regional needs. It is also below the threshold that allows the development of a number of higher rank central place functions. Secondly the social character and infrastructure of the surrounding villages are not ready to accept the imposition of sudden and radial population increase due to out migration from Enniscorthy.

Option B – Diffusion within Proposed by-pass Area

Another option, which Enniscorthy might pursue is that of using the proposed bypass as an expansion limit, with long term policy of developing residential neighbourhoods against the bypass, separated by green parkland from the town edge. This would draw pressure away from the town edge and spread the existing town in a more dispersed manner enabling greater scope for the development of extensive open space within the suburbs. This proposed option of dispersal would be similar to a dispersal of the population to the outer settlements as discussed under 'Diffusion', except that here the

settlements would be purpose-built within the town's environs. One disadvantage of this strategy however is the uncertain time frame for commencement and completion of the bypass and traffic congestion and associated problems that would exist in the interim. Also this strategy would put further reliance on the use of the car, as distances to town center uses and services would be too far for walking or cycling in the absence of safe pedestrian and cycle links.

Option C – Preferred Option, Consolidation of Radial Structure

A final Strategy considered is one, which might use the existing structure with its series of radials and its somewhat circular compact characteristic and refine or consolidate this structure to increase its efficiency and balance development on the east and west. Here a number of radial routes have been selected and inter-linked by proposed circulation routes on the outer edges of the town. The existing shell of the older residential areas around the center would remain unpenetrated by major routes, maintaining a pedestrian scale of contact between the older inner suburbs and the center. This strategy would be highly sustainable and would extend in an easily adjustable fashion the existing and recently developing structure of the town. It would represent the concept of supply-based planning.

This option incorporates relevant National & Regional & County Strategies while also providing a structures vision that will realistically accommodate continued urban growth. This scenario is generally believed to have the lowest environmental impacts, providing that the mitigation measures proposed are adopted.

3.2 Environmental Assessment of Alternatives

Development Alternative	Likely to Improve status of SEO's	Probable Conflict with Status of SEO's unlikely to be mitigated	Potential Conflict with status of SEO's likely to be mitigated by policies, strategies and objectives integrated into the Plan.	Uncertain Interaction with status of SEO's	Neutral interaction with status of SEO's	No Likely interaction with status of SEO's
Option A Diffusion		P1, B2, A1	B1, S1, W1, W2, F1, M1,	S2, L1, C1		
Option B Diffusion of Town within proposed by-pass area		L1, B2, P1	B1, S1, W1, W2, F1, A1, M1,	S2, C1		
Option C Consolidation of radial routes	P1, S2, A1, C1		B1, B2, S1, W1, W2, F1, M1,		L1	

Where the appraisal identifies, for example a likely conflict with the status of an SEO the relevant SEO code is entered into the conflict column. All potential conflicts and impacts identified below are those, which will occur if unmitigated against. Where such potential conflicts or impacts occur then Chapter 8 provides a recommendation on how to mitigate this potential impact for the chosen Development Alternative.

3.3 Mitigation measures

Mitigation measures were recommended in the Draft Environmental Report covering transport policies, transportation objectives, pedestrian and cycle networks, water supply policies, solid waste management policies, electricity policies, national transport node,

housing and estate management, community policies, sports facility policy, community and social issues objectives, sustainable development policy, open space and recreation policy, urban residential development policy and specific measures relating to proposed zoning additions in the final Plan.

Section 4. Monitoring

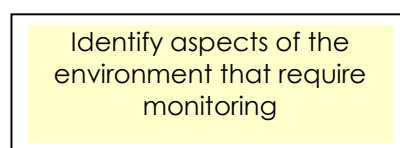
Monitoring requirements refer to the need to monitor the significant effects on the environment as a result of the implementation of the plan. Monitoring begins with the adoption of the plan or and continues for the duration of the plan.

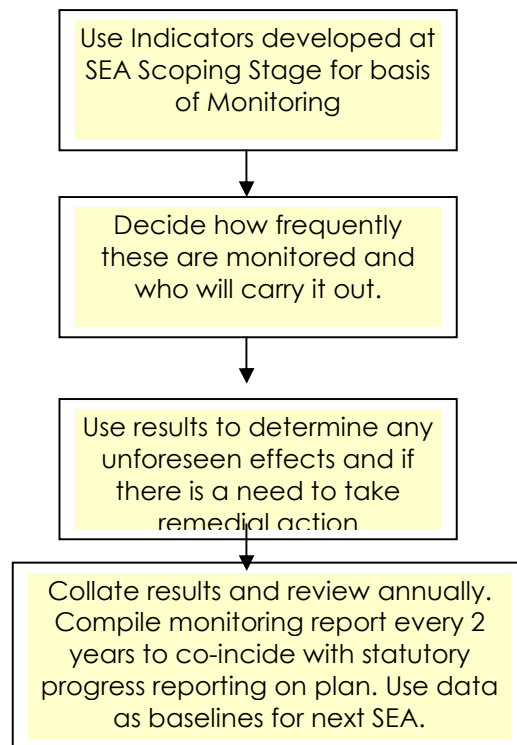
Article 10 of the SEA Directive requires that monitoring be carried out in order to identify at an early stage any unforeseen adverse effects due to the implementation of the Plan, and to be able to take remedial action. Monitoring and review, are key elements of the effective implementation of the Town & Environs Plan. It ensures that social, economic and physical objectives are fulfilled and that quality of life issues can be assessed.

The purpose of monitoring is to cross check significant effects, which may arise during the implementation stage of the development plan, against those predicted during the plan preparation stage. Monitoring is often based on indicators, which measure changes in the environment, especially changes which are critical in terms of environmental quality. Indicators aim at simplifying complex interrelationships and providing information on environmental issues, which are relatively easy to understand.

The statutory Managers Progress Report to be prepared 2 years after the adoption of the Town Plan under Section 15(2) of the Planning and Development Act (as amended), 2002 - 2006. It is anticipated that the environmental indicators will continually evolve so to accurately monitor the predicted environmental impacts of implementing the Plan and will be presented in the context of the 2 year plan review. Where existing monitoring is being carried out i.e. in relation to water quality, air quality etc., and these data sets will be collated in the review. It is envisaged that an in-house multi-disciplinary SEA monitoring team will be established along with a more detailed monitoring programme.

4.1 Summary of Monitoring Process:





4.2 Purpose of monitoring

The final stage of the process is the development and implementation of a monitoring programme.

The main purposes of monitoring are:

- To show changes to the environment that would be attributable to implementation of the Plan, and to allow *Actual* impacts to be tested against *Predicted* impacts.
- To suggest possible actions to reduce the effects of unforeseen events, if they occur.
- To collect good baseline information for the next Plan and other plans requiring SEA. Objectives, Indicators and Targets were developed at the scoping stage in consultation with the Environmental Authorities and were refined during the process.

4.3 Monitoring Indicators

Objectives, Indicators and Targets were developed at the scoping stage in consultation with the Environmental Authorities and were refined during the SEA process. The Objectives used to assess the Plan have been associated and those considered to be significant are Waste water, Flooding, Biodiversity and Cultural Heritage.

The recommendations in relation to Monitoring are;

- Avoid duplication of effort, the majority of the indicators are based on existing data. Therefore information is only required to be collated and reported on.
- The indicators should be collated and produced every 2 years and integrated with Progress report on the Enniscorthy Plan.
- Monitoring is a continual process and indicators should be improved or added to over time if required.
- Opportunities should be investigated for co-ordinating with data managers, GIS and SEA experts in relation to available data sets in usable formats.
- The results should contribute to the next review of the Plan and the next SEA to be undertaken in 4 years, which will be statutory.

4.4 Key Indicators

Environmental Component	Selected Indicator	Selected Target	Monitoring Source
Biodiversity, Flora & Fauna	Indicator B1: Percentage of habitat or percentage of species lost in designated wildlife sites	Target B1: No losses of habitat or species in designated wildlife sites during lifespan of the Town & Environs Plan.	WCC, NPWS
	Indicator B2: Number of significant impacts by development within and outside designated wildlife sites to habitats and flora & fauna within these sites.	Target B2: No significant impacts by development within and outside designated wildlife sites to habitats and flora and fauna within these sites during lifespan of the Plan.	WCC, NPWS
Population & Human Health	Indicator P1: Provision of community facilities, amenities and infrastructure including safe walking and cycling routes, a riverside walk, playgrounds, sports and recreational facilities, new primary and secondary schools, and other such facilities.	Target P1a: All necessary community facilities including a community center, safe walking & cycling routes, a riverside walk, playgrounds, sports and recreational facilities, new primary & secondary schools and other facilities as identified by the Enniscorthy Town & Environs Draft Plan 2007-2013. Target P1b: Sites and/or facilities for new primary & secondary schools, riverside walk, playgrounds and sports areas to be identified and secured or provided during life span of Plan.	WCC
Soil	Indicator S2: Area of brownfield land available	Target S2: No brownfield land to be available at the end of the Plan's lifespan.	WCC

Environmental Component	Selected Indicator	Selected Target	Monitoring Source
Water	Indicator W1a: μg of Phosphorous per litre of surface water	Target W1a: To reduce the amount of phosphorous in surface waters over the lifespan of the Plan. Target W1a(j): To achieve a level of less than $30\mu\text{g}$ of phosphorous per litre of surface water, in line with the requirement to achieve good water status under the Water Framework Directive, by 2015	WCC, EPA
	Indicator W1b: Biotic Quality Rating (Q value)	Target W1b: To achieve a biotic quality rating of Q 4, in line with the requirement to achieve good water status under the Water Framework Directive, by 2015	WCC, EPA
Flooding	Indicator F1: Number and types of developments granted permission in areas liable to flooding	Target F1: No development to be granted in flood plain areas, apart from redevelopment of existing structures and new developments within the town center core which are designed to withstand the 100 yr flood.	WCC
Air & Climatic Factors	Indicator F1: Change in Air Quality	Target F1: Maintain/improve air quality within Air Quality index bands	EPA
Material Assets	Indicator M1a: μg of Phosphorous per litre of wastewater discharge	Target M1a: To aim towards achieving a level of less than $30\mu\text{g}$ of Phosphorous per litre of wastewater discharge from new and upgraded wastewater treatment systems.	WCC
Cultural Heritage	Indicator C1: Number of planning applications for works to protected structures	Target C1: Maintain or increase number of protected structures contained in the RPS of the Plan	WCC
Landscape	Indicator C1: Number of planning applications along riverside and within proximity of Vinegar Hill	Target C1: No developments to be conspicuously located within the Slaney riverside & Vinegar Hill.	WCC

4.5 The recommendations in relation to Monitoring

- It is recommended in this case that the indicators set down be monitored and reported on. This information can also feed into the baseline for the next Plan.
- Avoid duplication of effort; the majority of the indicators are based on existing data. Therefore information is only required to be collated and reported on.
- The indicators should be collated and produced annually and integrated with the 2 year plan review
- Monitoring is a continuous process and indicators should be improved or added to over time if required
- There should be commitment on behalf of the Authorities to make resources available to carry out the monitoring for the duration of the Plan.

- Opportunities should be investigated for co-ordinating with data managers, GIS and SEA experts in relation to available data sets in usable formats.
- The results should contribute to the next review of the Plan and the next SEA to be undertaken.
- A set of indicators will form the basis for reporting on progress/performance of the Plan. It is recommended that the SEA indicators be monitored in conjunction with the plan.
- If the relevant data is not likely to become available consideration should be given to the use of an alternative 'Indicator'.

The Monitoring Programme should be flexible to take account of the various stages of the Plan and to be able to deal with specific environmental issues as they arise. The programme must be able to deal with the possibility of cumulative effects.