

1ST November 2017

Re: Draft Ireland 2040 - National Planning Framework and associated SEA Environmental Report, Natura Impact Statement and Strategic Flood Risk Assessment Report

Dear [REDACTED]

Thank you for your email dated 28th September 2017 regarding the publication of the Draft Ireland 2040 - National Planning Framework and associated SEA Environmental Report, Natura Impact Statement and Strategic Flood Risk Assessment Report

The Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA) Northern Ireland Environment Agency has considered the consultation documents and our opinions are set out below.

General Comments

DAERA welcomes the consideration of transboundary issues during the SEA process and the inclusion of the state of the environment and baseline conditions and pressures in Northern Ireland and are content with the conclusions reached in the Environmental Report.

We welcome the identification of mitigation measures to reduce impacts identified within the Environmental report. We assume that these mitigation measures will also apply to Northern Ireland in order to avoid and/or to reduce any transboundary impacts.

DAERA is content with the consideration of Natura 2000 sites within Northern Ireland in the Habitats Regulation Assessment process and the mitigation measures incorporated to avoid and/or to reduce impacts on European designated sites.

Biodiversity, Flora and Fauna

4.3.8 Nature Conservation: The Environment (Northern Ireland) Order 2002, The Wildlife (Northern Ireland) Order 1985 and The Wildlife and Natural Environment Act (Northern Ireland) 2011 should also be taken into consideration.

DAERA now have a map browser for NI protected sites and known priority habitats see:
<https://www.daera-ni.gov.uk/services/natural-environment-map-viewer>

Historic Environment

Spatial datasets on Northern Ireland's historic environment are available for download at this link: <https://www.communities-ni.gov.uk/publications/historic-environment-digital-datasets>.

Consideration of our records particularly those that lie in the border area, and additionally those which are cross border assets such as the Ulster Canal and the Black Pigs Dyke would be appropriate as additions to the baseline evidence.

Climate

Pg. 47 Table 5.3: In 2015, Northern Ireland's GHG emissions were estimated to be 20.7 million tonnes of carbon dioxide equivalent, or a 17.8% reduction in GHG emissions from the 1990 base year. The largest sectors in terms of emissions were agriculture (29%), transport (21%) and energy supply (19%). Most sectors showed a decreasing trend since the base year. The largest decreases, in terms of carbon dioxide equivalent, were in the energy supply, residential and waste sectors. They were driven by improvements in energy efficiency, fuel switching from coal to natural gas which became available in the late 1990's and the introduction of methane capture and oxidation systems in landfill management. There are government targets towards reducing GHG emissions in the UK by at least 80% on 1990 levels by 2050 but this will prove challenging; Northern Ireland's emissions amounted to 4.2% of the UK total in 2015. A key priority for climate change has been the implementation of Northern Ireland's Climate Change Adaptation Programme in 2014.

For future reference would be better to use the GHG inventory. The latest bulletin can be viewed at:

<https://www.daera-ni.gov.uk/articles/northern-ireland-greenhouse-gas-inventory>

Marine Environment

Overall, the National Planning Framework (and associated documents) are comprehensive and wide ranging and there are only a few places where some additional consideration of both transboundary issues in relation to marine spatial planning and also the integration between marine and terrestrial planning would be useful.

Chapter 6: Realising Our Island and Marine Potential

The introductory text states that 'land use planning and maritime planning processes will work alongside each other working also with other national administrations, such as Northern Ireland, regarding transboundary issues to ensure a consistent and effective policy and regulatory approach to marine and terrestrial planning'

However, the main body text only refers to the potential for development in relation to Ireland's national marine considerations and does not include consideration of the transboundary aspect (including the shared waters at Carlingford Lough and Lough Foyle).

It would also be helpful if the potential transboundary aspect of maritime spatial planning was also included in the associated National Policy Objective 40 (6.2 Page 92).



Overall, while this chapter addresses the need for transboundary considerations with Northern Ireland, this is done only in relation to the terrestrial planning systems and does not consider that similar deliberations should apply for the marine areas. This consideration should refer not only to the impact on shared waters of Carlingford Lough and Lough Foyle, but also to the potential impact across the respective wider marine areas on and from both terrestrial and maritime planning decisions.

Reference is made to working in tandem with the Regional Development Strategy (RDS) (NI), however, this would only address the terrestrial aspect of planning (7.2, page 100, Para. 2). Currently, in terms of maritime planning, account should also be taken of the UK Marine Policy Statement, which applies to all UK waters, including those of Northern Ireland's marine area. Once adopted, the Northern Ireland Marine Plan, will also be applicable in this context.

The National Policy Objective 45 (7.2 Page 101) should also include consideration of the marine aspect of spatial planning.

Figure 7.2 (page 103) Areas for Cross Border Local Consideration, the last box, 'co-ordinated spatial planning', could also include a reference to marine spatial planning and forthcoming marine plans.

National Policy Objective 52 (7.5, page 107) could also include a reference to seascape, in addition to the landscape considerations. This would take account of the coastal aspect and ensure better integration between terrestrial and marine spatial planning.

Chapter 8: Realising our Sustainable Future

The National Policy Objective 59 (page 119) could also include reference to seascape, in addition to the landscape considerations. This would take account of the coastal aspect and ensure better integration between terrestrial and marine spatial planning.

Chapter 9: Investing in Ireland 2040 - Implementation

This chapter should also include some consideration of the integration between marine and terrestrial planning in implementing the Ireland 2040 framework.

Strategic Environmental Assessment:

We note that there is an acknowledgement (page 6, 2nd para.) that the NPF will have to align with planning in the maritime environment, in the MSFD programme of measures and forthcoming maritime spatial plans

However,

- 'transboundary issues' would need to be reflected in Section 8.3.5.
- marine would need to be reflected in Section 8.3.6.
- the integration between marine and terrestrial planning would need to be reflected in Section 8.3.8.

In addition, it is suggested that references to Seascape are included under the following to ensure integration with marine planning as it is an important coastal element:

- Objective 9 (page 19)



- Table 3.2
- Page 46 – state of environment overview
- Table 5.18
- Table 6.1

It is also suggested that account is taken of the UK Marine Policy Statement which applies to all UK waters, including those of Northern Ireland's marine area, to ensure that transboundary

issues are considered in Section 4.3.4 (page 37) and included in Appendix B. Once adopted, the Northern Ireland Marine Plan, will also be applicable in this context.

Please contact the seateam@daera-ni.gov.uk should you have any queries or require clarification.

Yours sincerely



