

Appendix B: Scoping Consultation Responses

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| Organisation & contact: National Trust (Heather Thompson, Director for Northern Ireland) | | | | |
| Date received: 12 November 2013 | | | | |
| 1 | 1 | Para 1.3.5 | <p><u>Economic Development</u></p> <p>We are concerned that the list of 'Core Planning Principles' (at 1.3.5) does not include the principle of protecting the natural and historic environment. Presumably the thought is that this is covered in 'sustainable development' - which includes considering the economy, environment and community wellbeing in balance. However, our worry would be that listing 'Economic Growth' as a separate principle in the main list, this balance could be lost, and that 'Economic Growth' will become the overriding or dominant consideration. Instead the inclusion of 'protecting' or 'safeguarding the natural and historic environment' as a principle in its own right on the main list would provide clarity that would be in everyone's interest.</p> | DOE have now removed "Economic Growth" from the Core Planning Principles (December draft), but there is still no inclusion of "Natural and Historic Environment". As this is included in Scotland's 2010 SPP and England's 2012 NPPF, it has been recommended for inclusion in the SPPS, as set out in the enhancements section of the Environmental Report (Section 7.3). |
| 2 | 1 | General | In addition we would be keen to see, as the SPPS develops, how the 'sustainability' of economic growth is to be defined and assessed if it is to be useful for planners, applicants and all those with an interest in planning issues. | PP-5 of the December draft SPPS suggests 'sustainable' economic growth means "to facilitate the economic development needs of Northern Ireland in ways consistent with the protection of the environment and the principles of sustainable development". This policy has been assessed against the SEA Objectives, as can be seen in Table 5.1 of the Environmental Report. |
| 3 | 1 | General | <p><u>World Heritage Site Issues</u></p> <p>In June 2013 the UN body responsible for World Heritage Sites, UNESCO, proposed that both the UK Government and Northern Ireland should "strengthen legal provisions an planning framework to allow the national authorities to ensure their responsibilities for the implementation of the World Heritage Convention". The SPPS presents the perfect opportunity to address issues around protection for World Heritage Sites as it updates subject policies under the existing PPS 4, policy BH5 and its policy amplification...</p> | World Heritage Sites are included in PP-1 of the SPPS. A recommendation for strengthening protection has been set out in the enhancements section of the Environmental Report (Section 7.3). |
| 4 | 2 | p.49 | <p>We would propose:</p> <p>- The SEA must properly recognise and specify the international significance of World Heritage Site designation, setting out the principle of 'outstanding universal value' - and the fact that World Heritage Sites belong 'to all the peoples of the world, irrespective of the territory on which they are located'. It should correctly identify the outstanding universal values of our current World Heritage</p> | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Landscape. |

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| 5 | 2 | p.61 | - That World Heritage Site protection should be included as a distinct SEA sub-objective under objective 10, landscape (pp.61) - along the lines of "c) Provide protection for World Heritage Sites and their settings (buffer zones)". The issue of setting and buffer zone is of particular importance for 'natural' World Heritage Sites. | This has been added to Table 3.1 of the Environmental Report. |
| 6 | 2 | General | - The SEA (and subsequently the SPPS) should ensure that 'buffer zones' are established for current and future World Heritage Sites in Northern Ireland (at the Giant's Causeway there is currently such a zone in draft form - a 'distinctive setting' designated in the draft Northern Area Plan) | This has been mentioned in the enhancements section of the Environmental Report (Section 7.3). |
| 7 | 2 | General | - That any future development proposals within a buffer zone which could threaten the outstanding universal value of a World Heritage Site be refused. | This has been mentioned in the enhancements section of the Environmental Report (Section 7.3). |
| 8 | 2 | p.49 | <u>Other Issues</u> The SEA fails to properly lay out the (already limited) scope of protections which should be afforded by the Area of Outstanding Natural Beauty designation in Northern Ireland. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Landscape. |
| 9 | 2 | p.60 | Under SEA objective 4, we would suggest that the language around the need for brownfield land development could be strengthened, i.e. instead of 'encourage use of previously developed land' perhaps 'prioritise use of previously developed land' as it is vital for the sake of communities and environment that such land should be considered first. | This has been modified in Table 3.1 of the Environmental Report. |
| Organisation & contact: Geological Survey of Ireland (John Butler, Clerical Officer) Date received: 13 November 2013 | | | | |
| 10 | 1 | General | <u>Datasets</u> To assist with an Environmental impact Assessment (EIA), and especially the "Soils & Geology" and "Surface Water & Groundwater" parts, maps/databases are available on the GSI website under "Online Mapping"- direct link: http://www.gsi.ie/Mapping.htm with datasets currently available for Bedrock, Geological Heritage, Groundwater, Karst, Geotechnical boreholes, Mineral locations. More recent viewers accessible from the same link include the National Landslide Viewer, the Aggregate Potential Mapping and the Geotechnical Viewer. Please note that Geological Heritage data can now be viewed online on the GSI Public Data Viewer at: http://spatial.dcenr.gov.ie/imf/imf.jsp?site=GSI_Simple These will all be available to download as well in the next few weeks from: http://www.dcenr.gov.ie/Spatial+Data/Geological+Survey+of+Ireland/GSI+Spatial+Data+Downloads.htm | No action taken as the database only includes data in RoI. This is an SEA of planning policy in NI, not an EIA of a development in RoI, thus not considered applicable. |
| 11 | 2 | General | <u>Guidelines</u> - Department of Environment, Heritage and Local Government, 2006. Wind Energy Development Guidelines, chapter 5.3. - IWEA, 2012. Best Practice Guidelines - Institute of Geologists of Ireland, 2013. Geology in Environmental Impact Statements, A Guid | No action taken; this is an SEA of planning policy in NI, not an EIA of a development in RoI, thus not considered applicable. |

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| 12 | 2 | General | <u>Other comments</u> Should you identify a Geological Heritage Site with buffer within your study area, please contact Sarah Gatley, Head of the Geological Heritage and Planning Programme at sarah.gatley@gsi.ie, for further information and possible mitigation measures if applicable. | No action taken; this is an SEA of planning policy in NI, not an EIA of a development in RoI, thus not considered applicable. |
| Organisation & contact: Northern Ireland Environment Link (Sue Christie, Director) Date received: 14 November 2013 | | | | |
| 13 | 2 | Table 1.2 | We suggest that this table should also include Local Nature Reserves, Country Parks and Sites of Local Nature Conservation Interest. Designated Sites NI should also include figures for Conservation Areas (c60) and Areas of Townscape Character. The table should carry a note to point out that there is significant overlap between designations, with all SACs and most SPAs designated as ASSI for example. | This has now been updated in Section 1.4 and Table 1.2 of the Environmental Report. |
| 14 | 2 | Para 3.4.4 | We suggest that the importance of a high quality natural environment to public health (both physical and mental) should be emphasised. | This has been emphasised in the Environmental Report in Table 1.4, Section 2.3 (under Health), Table 3.1 (a new SEA sub-objective has been added under Health) and to the enhancements Section 7.3. |
| 15 | 2 | Para 3.5.2 | We suggest that mention is made here of the land tenure system in NI – a very large number of small owner-occupied farms, the lack of tenant farming, and the letting of about one third of farm area through conacre (11 month) agreements. This is the context in which achieving any objectives on a landscape scale in NI must currently happen. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Soil and Land Use. |
| 16 | 2 | Para 3.5.6 | NIEL promotes the ecosystem service approach throughout government. One of the most valuable services provided by peatland is its carbon sequestration and storage capacity, which should be emphasised here. | Extra emphasis has been added in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Soil and Land Use. |
| 17 | 2 | Para 3.6.8 | The coast is an essential meeting point between the two planning regimes, and needs to be managed carefully. NIEL suggest a separate section on Coast in the document. Apart from water quality there are important planning issues ahead on the bringing ashore of offshore renewable energy, oil exploration and possible exploitation, sea-level change and coastal protection, and tourism-related developments. NIEL believes the need for Shoreline Management Plans in NI should be emphasised. | The coast is mentioned in relation to ecology, socio-economics, water, climate change, landscape, and ecosystem services in Section 2.3 of the Environmental Report. PP-2 of the December draft SPPS covers coastal development; enhancements to this have been included in Section 7.3 of the Environmental Report. |
| 18 | 2 | Para 3.8.1 | An increase in extreme weather events, including heavy rainfall and storms, is also predicted. A key manifestation of climate change will be sea level rise. This has implications for coastal planning, understanding coastal processes and managed retreat. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Climate Change. |

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| 19 | 2 | Para 3.10.2 | The first statement is not necessarily true – built and archaeological heritage in NI has inherited a legacy of neglect and mistreatment, which undermines its value among society. Unlike England, the Second Survey of Listed Buildings is area based (not subject based) and once finally completed will provide a comprehensive written and photographic record of NI's built heritage. New build is currently often preferred to renovation/restoration of an existing building, which can be seriously deleterious to the cultural heritage. | Alterations have been made in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Cultural Heritage. |
| 20 | 2 | Para 3.10.3 | Final sentence should be amended as follows 'these are subject to an ongoing conservation programme to which only modest funds are currently allocated.' | Alterations have been made in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Cultural Heritage. |
| 21 | 3 | Para 3.10.6 | Final sentence should be rewritten as follows: In 2011/12 there were 487 listed buildings and structures on the database, and twelve buildings had been removed during the same period. The Programme for Government 2006 set a target of 200 eligible removals (i.e. pre 2006 additions) by 2016. 120 building still remain on the At Risk register, and it is thus highly unlikely that this target will be achieved within the remaining three years. | Alterations have been made in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Cultural Heritage. |
| 22 | 3 | Para 3.11.3 | NIEL suggests the inclusion of a note that these AONBs have no statutory management plans and are therefore not equivalent to those in England and Wales. NI's AONBs also fail to qualify as Protected Areas under IUCN definitions. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Landscape. |
| Organisation & contact: Causeway Coast and Glens Heritage Trust (Andrew Bratton, AONB / WHS Project Manager) Date received: 14 November 2013 | | | | |
| 23 | 1 | p.9 | With regards to the Giant's Causeway and Causeway Coast World Heritage Site (WHS): a) On p.9 of the SEA the WHS boundary area is incorrect. The official boundary of the WHS is 236ha. | This has now been corrected in Table 1.2 of the Environmental Report. |
| 24 | 1 | p.9 | b) The draft Northern Area Plan and its associated maps list the 'Supportive' and 'Distinctive' WHS Settings as 'proposed designations'. These proposed designations are material planning considerations and could therefore be considered conservation designations for the purposes of the table on p.9: Supportive Setting - 8,671ha; Distinctive Setting - 2,033ha. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Landscape. |
| 25 | 1 | Para 3.11.3 | c) Within paragraph 3.11.3 the text states that the Giant's Causeway and Causeway Coast WHS is 'renowned for its polygonal columns of layered basalt'. This is at odds with the official 'Statement of Outstanding Universal Value' (SOUV) for the site which provides the definitive justification for the site's inscription and designation. | This has now been corrected in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Landscape. |
| 26 | 1 | Para 3.11.3 | With regards to the Areas of Outstanding Natural Beauty (AONBs): a) Paragraph 3.11.3 correctly states there are eight AONBs in Northern Ireland, however it fails to list the official names correctly: Antrim Coast and Glens; Causeway Coast; Binevenagh; Sperrin; Mourne; Ring of Guillon; Strangford and Lecale; Lagan Valley. | This has now been corrected in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Landscape. |

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| 27 | 2 | Para 3.11.3 | Paragraph 3.11.3 fails to refer to the official legislative terminology for AONBs in Northern Ireland under the 1985 Nature Conservation and Amenity Lands Order i.e. the DoE may, in relation to an area designated as an AONB formulate proposals for: - conserving or enhancing the natural beauty or amenities of that area; - conserving wildlife, historic objects or natural phenomena within it; - promoting its enjoyment by the public; - providing or maintaining public access to it. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Landscape. |
| 28 | 2 | Para 3.11.5 | c) Paragraph 3.11.5 states that there are on-going discussions for a National Park 'in much of County Antrim'. This statement is incorrect and potentially quite damaging for future landowner engagement regarding landscape protection. | Inaccuracies are noted. The Environmental Report does not repeat this information. |
| Organisation & contact: Northern Ireland Environment Agency (John O Boyle, SEA Team) Date received: 15 November 2013 | | | | |
| 24 | 1 | General | <p>We would point out that future Development Plans must 'take account' of the 'Regional Development Strategy 2035, Building a Better Future'. As such, the SPPS should be guided by the Strategic Guidance within this document, and in particular, from an environmental perspective; RG9, RG10, RG11 and RG12.</p> <p>Whilst acknowledging that there are knowledge gaps, in Northern Ireland, in the emerging area of the ecosystems approach, we encourage the use of an Ecosystems Approach (including looking at Ecosystem Services) at the next stage of the process.</p> <p>We suggest that alternatives to the SPPS itself should be outlined/ considered within the Environmental Report and the Likely Significant Effects of the SPPS and the alternatives on the receiving environment should be examined. A rigorous consideration of alternatives should result in stronger preferred alternative.</p> | <p>The December draft of the SPPS sets out RDS requirements at the start of each land-use planning policy.</p> <p>An Ecosystems Approach has been taken in the Environmental Report. Methodology is set out in Section 3.2 and an assessment of alternatives against Ecosystem Services shown in Table 4.2. Recommended enhancement measures related to Ecosystem Services are set out in Section 7.3.</p> <p>Strategic alternatives (including a best practice alternative derived from innovative and eco-friendly aspects of Scottish, English and Welsh planning policy) are considered and assessed in Chapter 4 of the Environmental Report, including against SEA Objectives and Ecosystem Services.</p> |

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| 25 | 1 | General | <p>It is noted that Sustainable Development is listed as a core planning principle in Section 1.3.5. It is important that this gives equal significance to the three pillars of economic, social and environmental development.</p> <p>It is noted that Sustainable Economic Growth is also listed as a key principle – which is essentially a repetition of Sustainable Development but with more emphasis on the economic growth aspect. It is important that the SPPS and SEA do not promote or allow economic growth at the expense of sustainable social and environmental considerations.</p> | <p>Sustainable Development is addressed by CPP-1 of the December draft SPPS; this has been assessed against the SEA Objectives.</p> <p>'Sustainable Economic Growth' has been removed from the list of core planning principles in the December draft SPPS in response to comments from stakeholders during the workshops held in October.</p> |
| 26 | 2 | 3.7.1 | The following amended sentences are suggested for incorporation into the Scoping Report text: 'These elevated PAH levels are believed to be predominantly due to the domestic burning of bituminous (smoky) coal, where natural gas is unavailable.' | This has now been amended in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Air Quality. |
| 27 | 2 | 3.7.2 | <p>There are 28 AQMAs.</p> <p>'Of these, eleven have been declared AQMAs for NO₂ (either on its own or together with PM₁₀), four have AQMAs for PM₁₀ (on its own or with another pollutant) and one has an AQMA for SO₂ (together with PM₁₀).'</p> <p>'There are two AQMAs in Ballymena; one, for NO₂, is due to traffic emissions while the other is declared for PM₁₀ from domestic combustion.'</p> | This has now been amended in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Air Quality. |
| 28 | 2 | 3.7.4 | 'Northern Ireland's ammonia emissions have reduced only slightly (by 6%) between 1990 and 2011 and, in 2011, accounted for 10% of total UK ammonia emissions. In 2011, 95% of Northern Ireland's ammonia emissions were from agriculture, with 80% coming from manure management alone. Air pollution from agricultural...' | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Air Quality. |
| 29 | 2 | 3.13.2 | <p>In the 'Ecology and Nature Conservation' section, please add in, after sub-section on NI's habitats and species –</p> <p>'The majority of protected sites in Northern Ireland are at risk of damage from ammonia emissions arising from agricultural activities, specifically manure handling, storage and spreading.'</p> | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Ecology and Nature Conservation. |
| 30 | 2 | Table 4.1 | Section 7 on Air Quality, part b could be more specific: 'Minimise the effects of ammonia emissions from agricultural activities on designated sites and priority habitats.' | This has been amended in Table 3.1 of the Environmental Report. |

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| 31 | 2-3 | General | <p><u>Noise (sub-topic of Health and Quality of Life)</u> The following information may be of use in relation to noise regarding planning policy and for baseline noise information:</p> <p>The World Health Organisation Guidelines for Community Noise may be referred to for guidance.</p> <p>Noise maps for Northern Ireland together with information on the Environmental Noise Directive are available on the Department's website: http://www.doeni.gov.uk/index/protect_the_environment/local_environmental_issues/noise.htm and the Noise Northern Ireland website: www.noiseni.co.uk</p> | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Health and Quality of Life. |
| 32 | 3 | Table 2.2 | <p><u>Climate Change</u> Whilst the first three sub topics are about greenhouse gas emissions it is suggested that a general mitigation sub-topic should be included, such as 'meeting mitigation targets to reduce greenhouse gas emissions'. The sub topic relating to adaptation could also amended to include '...such as, flooding, global warming and changing weather patterns.'</p> | This has been amended in Table 1.4 of the Environmental Report. |
| 33 | 3 | General | <p><u>Baseline Data</u> Climate change adds a further dimension to the topics within this Section as its impacts cut across all of the topics. While climate change impacts are drawn out in some topics they could be drawn out more explicitly within each of the other topic areas. Further information on the impacts can be found in the Climate Change Risk Assessment for Northern Ireland published in January 2012. The document is available on the DoE website at: http://www.doeni.gov.uk/index/protect_the_environment/climate_change/uk_climate_change_risk_assessment.htm</p> <p>Taking each of the topic areas in turn the following could be highlighted:</p> <ul style="list-style-type: none"> • 3.2 - Ecology & Nature Conservation: the key impacts of climate change on the terrestrial, freshwater and marine environments • 3.3 - Socio-economic and 3.4 Health & Quality of Life: the greater impact of climate change on vulnerable people • 3.5 – Soil & Land use: impacts, such as, waterlogging and landslides • 3.6 – Water: impacts, such as, flooding risk, water quality, pollution and increased temperatures • 3.7 – Air: the relationship between air quality and climate change, particularly in relation to ozone • 3.9 – Material Assets: the impacts of climate change on sustainable forestry, important infrastructure & infrastructure networks and waste management • 3.10 – Cultural Heritage: cultural heritage may be at risk from flooding in general, not just coastal flooding. | <p>The CCRA report is referred to in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Climate Change, and also in the review of other plans and programmes (Section 2.3 and Appendix C).</p> <p>Climate change is now referred to in all subject topics in the Summary of Baseline Data (Section 2.4 of the Environmental Report).</p> |

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| 34 | 4 | 3.8.4 | 1st bullet – forestry productivity is not projected to increase significantly. 6th bullet – suggest amendment to ‘flooding may become the greatest climate change concern for people, property’ | This has now been amended in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Climate Change. |
| 35 | 4 | 3.8.5 | Part 4 of the UK Climate Change Act 2008 sets out the duties of Northern Ireland in relation to the impact of and adaptation to climate change. | This is now referred to in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Climate Change. |
| 36 | 4 | 3.8.7 | This paragraph needs updating: The remit of the Cross Departmental Working Group was extended to encompass climate change adaptation and includes: • Supporting the preparation of assessment of the risks for the UK of the current and predicted impact of climate change; and • To prepare and deliver a cross-departmental Adaptation Programme on climate change. The CDWG CC also reports annually to the NI Executive on progress in relation to adaptation. Up to date information can be found on the DOE website at: http://www.doeni.gov.uk/index/protect_the_environment/climate_change/cross_departmental_working_group.htm | This has now been amended in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Climate Change. |
| 37 | 4 | 3.8.15 | Whilst low levels of afforestation currently present a limited opportunity for carbon offsetting, there is good potential for carbon storage considering DARD’s strategic aim to double the area of tree cover over the next 50 years in the context of sustainable forestry. See http://www.dardni.gov.uk/index/forestry/forestry-publications/policy-and-legislation.htm These may need to be reviewed given the cross cutting nature of climate change. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Climate Change. |
| 38 | 5 | Table 4.1 | Climate Change Is it appropriate to restrict sub objective (c) to transport, industry and agriculture given % of total GHG emissions by Sector? 2011 figures indicate Energy supply (19%) Residential Combustion (16%) Business (12%) Waste management (2%). Industry only account for 1%. Suggest amending sub-objective (c) to ‘Reduce greenhouse gas emissions by supporting the sustainable location of development’. The last 3 sub objectives could be grouped together to be more holistic and flexible given the long term nature of the SPPS. A new sub-objective of ‘Minimise vulnerability and improve resilience to the impacts of climate change and support future proofing of new development’ is suggested. Reasoning: Sub –objective (e) restricts improved resilience to habitats and the water environment. Resilience should be improved across housing, historic environment, infrastructure etc. Sub-objective (e) & (f) both refer to minimise and adapt. In addition, Analytical Services Branch looked at greenhouse gas emissions and trends in temperatures and rainfall and found a couple of issues detailed below. | Table 3.1 of the Environmental Report has been edited as follows: GHG emissions from energy supply and residential combustion are dealt with through sub-objectives a and b, therefore do not need to be incorporated into c, however some changes to wording have been made to reflect this. The last three sub-objectives have been merged as requested. |

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| 39 | 5 | 3.8.2 | <p>There is some evidence of an upward trend in mean annual rainfall, with less rain falling in summer months. The 1970s had lower levels of rainfall but there is no strong trend in recent years. The DOE Climate Change indicators for precipitation (linked below) agree with the comments about summer rainfall and about the 1970s, but they do not show an upward trend in mean annual rainfall. Have a look at the 'annual rainfall' tab. http://www.doeni.gov.uk/cc_indicators_-_precipitation1.xls</p> <p>Table 3.3, percentage for Agriculture in Scotland should be 16.2% not 16.3%. Source: 2011 Devolved Administration Greenhouse Gas Inventories. http://naei.defra.gov.uk/reports/reports?report_id=756</p> | Inaccuracies are noted. The Environmental Report does not repeat this information. |
| 40 | 5 | 3.8.9 | <p>Despite a small increase (3.6%) in GHG emissions during 2009-2010 This figure is taken from the 2010 GHG Inventory. This has been replaced by the more up to date 2011 GHG Inventory, which revises the figures for 2009 and 2010, and results in an increase of 4.3% between 2009 and 2010. whilst carbon dioxide emissions (which accounted for 72.1% of all GHG emissions in NI...) This should be 69.1%. Source: 2011 GHG Inventory NI statistical bulletin http://www.doeni.gov.uk/ghg-inventory-statistical-bulletin-2011.pdf#page=2</p> | The Summary of Baseline Data (Section 2.4 of the Environmental Report) under Climate Change has been updated to reflect the more recent data. |
| 41 | 5 | Table 3.4 | <p>All columns 1990 to 2010 contain incorrect figures. These figures refer to the 2010 GHG Inventory. However each year when the updated GHG Inventory is produced, it revises the entire back series from 1990 to current year. So the 2011 GHG Inventory contains updates for all the figures in this table. Source: 2011 Devolved Administration Greenhouse Gas Inventories. http://naei.defra.gov.uk/reports/reports?report_id=756 or table 5.1 on page 108 of associated report http://uk-air.defra.gov.uk/reports/cat07/1306070907_DA_GHGI_report_2011_Issue1.pdf#page=108</p> | Inaccuracies are noted. The Environmental Report does not repeat this information. |
| 42 | 5-6 | 3.8.11 | <p>Across the UK, emissions from the transport sector have shown a small increase since 1990 This statement is based on the 2010 GHG Inventory. The updated 2011 GHG Inventory has revised the figures, and the small increase becomes a small decrease. Source: 2011 Devolved Administration Greenhouse Gas Inventories. http://naei.defra.gov.uk/reports/reports?report_id=756</p> | The Summary of Baseline Data (Section 2.4 of the Environmental Report) under Climate Change has been updated to reflect the more recent data. |

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| 43 | 6 | General | <p><u>Waste</u></p> <ul style="list-style-type: none"> The brief summary of waste management data trends in Section 3.9 is reasonable. With regard to Planning and waste management, the key issue is the selection and approval process for the location of controversial waste facilities (landfills, thermal treatment, AD plants, etc) and either the SPPS and/or the SEA will need to clearly address the policy in relation to this issue. It is noted that Planning and Waste Management is included in the list of subject policies in Section 1.3.6 It is not clear from Section 1.3 if the existing planning policy on waste management & planning (PPS11) will be replaced by or incorporated into SPPS. Will SPPS contain the same level of detail as PPS11? PPS11 is currently out of date and needs urgent review & updating. Will these essential updates be included in SPPS? | PP-16 of the December draft of the Environmental Report deals with the location and minimising impact of waste facilities. This represents a less detailed consolidation of PPS11, however it refers to the more recent waste management requirements of PFG 2011-2015, the RDS 2035, and the revised Waste Framework Directive. Recommendations have been made in the enhancements section of the Environmental Report (Section 7.3). |
| 44 | 6 | Tables 2.2 and 4.1 | <p><u>Habitats, Flora & Fauna</u></p> <p>Page 14, Chapter 2, we suggest that in Table 2.2 Sustainability Topics, some measure of 'invasives' should be included under Sustainability Topic, 'Ecology and Nature Conservation'. Spread of invasives can be associated with poor bio-security practice linked to development, through earth moving and waste disposal etc. Invasives could also be incorporated within Table 4.1 SEA Objectives against SEA objective 1.</p> | This has now been included in Tables 1.4 and 3.1 of the Environmental Report. |
| 45 | 6 | Section 3.2 | Page 21, Chapter 3, the report acknowledges that for the majority of NI's priority species there are no trends. In many cases the best available information comes from 'UK trends' and whilst it is reasonable to assume that NI species trends will differ, it also seems reasonable to adopt a precautionary approach to priority species in NI which are showing marked declines in the UK. | This has now been amended in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Ecology and Nature Conservation. |
| 46 | 6 | Tables 2.2 and 4.1 | On page 43, 3.8.15, the Scoping Report acknowledges the 'massive carbon store' of peatland when specifically managed to protect this store. Protection of Peatland could be included as a meaningful sub-topic under 'Green infrastructure and Ecosystems Services' in Table 2.2, page 15. Protection of peatlands could also be incorporated within Table 4.1 SEA Objectives specifically against SEA objective 7d, 8a and 11a. | This has now been included in Tables 1.4 and 3.1 of the Environmental Report. |
| 47 | 6 | General | On page 50, reference is made to the possibility of creating a National Park in much of County Antrim. This is factually incorrect. | Inaccuracies are noted. The Environmental Report does not repeat this information. |
| 48 | 6 | Table 2.2 | On page 56, reference is made to the large increase in the area of agricultural grassland lost to rural housing. This item could be included as a meaningful sub-topic under 'Soil and Land Use' in Table 2.2, page 14. | This is now emphasised in Tables 1.4 and 3.1 of the Environmental Report. |

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| 49 | 7 | General | On page 57, it is noted that landscapes in NI have been affected by rural development. We recommend that Regional scale impacts on landscape quality should be expanded to encompass sites outside of designated landscape to include impacts on all Landscape Character Areas in Northern Ireland. A very useful resource for information on general impacts, design and site considerations may be obtained from the ERM Landscape Character Assessment Series at: http://www.doeni.gov.uk/niea/land-home/landscape_home/country_landscape.htm | No action taken. The sentence is not restricted to protected landscapes; it includes all landscapes. LCAs were mentioned in Section 3.11 of the Scoping Report. |
| 50 | 7 | General | We agree with the stated requirement on page 51 for agreement and co-operation of stakeholders in a participatory planning process regarding the creation of multi-functional GI networks. | Comment welcomed. |
| 51 | 7 | General | References should include: the Natural Heritage Vision & Strategic Plan 2020 found at: http://niea.intranet.nigov.net/niea_natural_heritage_strategy.pdf and the second report of the Northern Ireland Biodiversity Group 2005-2009. Note that the new 'Biodiversity Strategy' is due to be published by the end of this year. | References added and information added to the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Ecology and Nature Conservation. |
| 52 | 7 | General | As Councils are due to become the new plan making bodies, particular reference should be paid to Recommendation 21 regarding the 'Biodiversity Duty' of Councils. | This has been mentioned in the enhancements section of the Environmental Report (Section 7.3). |
| 53 | 7 | General | <u>Water</u> We note that the water quality legislation and the River Basin Management Plan related Register of Plans & Programmes below have not been included in the scoping report. As such their impact would not be assessed by the SEA. We recommend that this legislation and the plans and programmes are included in the scoping report and fully considered within the environmental report. The SEA assessment of River Basin Management Plans should also include the potential impact on Local Management Area Action Plans. | The three river basin management plans relating to NI were included in the Review of Plans and Programmes (Appendix A of the Scoping Report) and are also considered in Section 2.3 and Appendix C of the Environmental Report. Local level plans have not been assessed due to the strategic and non-spatial nature of the SPPS. |
| 54 | 7 | General | <u>Water Quality Legislation</u> <ul style="list-style-type: none"> • The Control of Pollution (Silage, Slurry and Agricultural Fuel Oil) Regulations (Northern Ireland) 2003 (as amended) • The Nitrates Action Programme Regulations (Northern Ireland) 2010 (as amended) • Environmental Liability (Prevention and Remediation) Regulations (Northern Ireland) 2009 • Control of Pollution (Oil Storage) Regulations (Northern Ireland) 2010 (as amended) | The SEA has not assessed the impact of legislation related to water quality or any other SEA topic. However it is noted where relevant in the Environmental Report that compliance with various regulations e.g. NAP, EIA or regarding pollution, will minimise certain impacts. |

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| 55 | 8 | General | <p><u>Register of Plans & Programmes</u></p> <p>River Basin Management Plans - see also list of related Register of Plans & Programmes:</p> <p>http://www.ni-environment.gov.uk/register_plansprogs_ne.pdf http://www.ni-environment.gov.uk/register_plansprogs_nw.pdf http://www.ni-environment.gov.uk/register_plansprogs_nb.pdf</p> | The three river basin management plans relating to NI were included in the Review of Plans and Programmes (Appendix A of the Scoping Report) and are also considered in Section 2.3 and Appendix C of the Environmental Report. |
| <p>Organisation and Contact: RSPB (Michelle Hill, Senior Conservation Officer; Planning) Date received: 15th November 2013</p> | | | | |
| 56 | 2 | General | Given that the Planning Bill (NI) 2013 has now been withdrawn, all future documentation should ensure that it reflects the current legislative context. | References to planning legislation have been checked. |
| 57 | 2 | 1.3.5 | With regards to the core principles, and as they are only headings at the moment, no detailed comments can be made, however at this stage we would question where the natural environment fits. Furthermore, we are of the opinion that sustainable development needs to come first in the list. Getting sustainable development right is critical and will place the economy in context. The 2005 UK Sustainable Development strategy is useful in this regard. | Sustainable Development does not come first in the list, addressed by CPP-1 of the December draft SPPS. Though not a standalone principle, the natural environment is covered by CPP-1, CPP-2 and CPP-6. |
| 58 | 2 | 2.5.4 | We question why the 2005 UK Sustainable Development Strategy was in a list of documents which might have negative in-combination effects with the SPPS, but nonetheless welcome the fact that it has been referenced and is contained within Appendix A. | Appendix A of the Scoping Report suggests positive associations; the strategy was listed in 2.5.4 of the Scoping Report in error. |
| 59 | 2 | 2.3 | The RSPB welcomes the fact the interrelationship between topics has been considered e.g. ecology and health within the Green Infrastructure and Ecosystems Services topic. In this regard we would also reference the following useful reports: (i) wellbeing through wildlife, RSPB (http://www.rspb.org.uk/Images/wellbeing_tcm9-132872.pdf) (ii) planning for a healthy environment good practice guide for green infrastructure and biodiversity Town and Country Planning Association The Wildlife Trusts, July 2012 | These documents have now been referenced and their subject mentioned in the enhancements section of the Environmental Report (Section 7.3). |
| 60 | 2 | 3.2 | In this section, regard should also be given to candidate nature conservation designations. We would also recommend inclusion of the State of Nature Report (http://www.rspb.org.uk/Images/stateofnature_tcm9-345839.pdf) This report present the very latest population data on a wide range of species to provide a single, authoritative statement on the changing state of nature in the UK and the UK Overseas Territories, including Northern Ireland. | Candidate SACs are referred to in Section 2.3 of the Environmental Report. The State of Nature Report only discusses the UK as a whole, so was not deemed appropriate for inclusion in the Environmental Report which summarises key baseline data for NI. |
| 61 | 3 | 3.4 | Please refer to documentation noted at 2.3 above. This section should acknowledge the links between the environment, health and quality of life. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Health and Quality of Life. |

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| 62 | 3 | 3.5.1 | The second sentence of this paragraph should also acknowledge that the location of land is as much a factor in the value of land as is quality. Consideration should reach beyond solely housing completions on Greenfield and Brownfield land, and relate to development per se, including urban extensions. | Inaccuracies are noted. The Environmental Report does not repeat this information. |
| 63 | 3 | 3.5.6 | This paragraph should also make reference to the importance that peatland can make with regards to water quality, carbon sequestration and climate change. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Soil and Land Use and also Water. |
| 64 | 3 | 3.5.8, 3.5.9 | These paragraphs should also reflect the fact that current Agri-environment schemes are currently under review and that under current proposals, the only scheme available in 2016 will be the Northern Ireland Countryside Management Scheme (NICMS). The Environmentally Sensitive Areas Scheme (ESAS), and Countryside Management Schemes 1 and 2 will finish in 2015. The resultant effect of this mean that in 2016, the land area covered by Agri-environment in Northern Ireland will be down to 10%; this represents a drop of approximately 32% from its current level. We believe that better transitional arrangements for 2014, including the retention and extension of particular aspects of the current Agri-environment package, could have potentially lessened the impact of the new Rural Development Programme in 2016. The RSPB is highly supportive of Agri-environment schemes and has been advocating that rural development is funded to the maximum amount to allow all farmers and nature to benefit. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Soil and Land Use. |
| 65 | 3 | 3.5.16 | Not only is there an expectation for Brownfield development, there is a policy requirement at strategic level within the Regional Development Strategy and Planning Policy Statements, and also at local level within the more recently adopted Area Plans. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Soil and Land Use. |
| 66 | 4 | 3.8 | The section should also have regard to the predicted impact that climate change will have on sea level rise, the declining return period for extreme water levels, and the combined implication of both for flood risk areas and coastal erosion. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Climate Change. |
| 67 | 4 | 3.9.2 | The reference to potential for future production and power generation from NI deposits of coal, peat and lignite should be set within the context of the necessary move away from fossil fuel production towards renewable energy generation in order to be compatible with climate change commitments. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Material Assets. |
| 68 | 4 | 3.11.5 | This paragraph requires to be updated to reflect the Environment Minister's statement on 11 November 2013 'shelving' the National Parks Plan. | The contentious debate about National Parks has been deliberately omitted from the Environmental Report. |
| 69 | 4 | 3.12 | The RSPB welcomes the inclusion of this section. | Comment welcomed. |

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| 70 | 4 | 3.13 | <p>- Ecology and Nature: A further key sustainability issue in this section is the failure to recognise that economic development and the natural environment do not need to be mutually exclusive; there is currently a false division of putting the economy against the natural environment. Both can co-exist, is about getting the right development in the right place at the right time.</p> <p>- Health and Quality of Life: A key issue in this section is not only access issues to the natural environment, but that there is also a real disconnect between people and their natural surroundings.</p> <p>- Soil and Land Use: see previous comments at 3.5.8 and 3.5.9 above.</p> <p>- Water: regard should also be made to the effects of peatland degradation on catchment pollution and discolouration levels.</p> <p>- Air Quality, Climate Change and Material Assets: the impacts of sea level change and return frequency of extreme weather conditions should also be considered. Urban and rural dwellers (human and natural environment) also are susceptible to disruption and should also be included in this section. Coastal erosion as a result of sea level change should also be considered. Continued reliance on energy generation from fossil fuels should also be included as a key sustainability issue.</p> | Most of this has now been included under Key Issues and Likely Future Trends (Section 2.5 of the Environmental Report). |
| 71 | 5 | Table 4.1 | <p>4.d. With regards to 'encourage local production of food and fuel', it is suggested that only the local production of renewable fuel sources should be encouraged in order to be compatible with climate change commitments.</p> <p>7.e. The need to adapt to coastal erosion as a result of sea level change should also be included.</p> <p>8. This should include maximising opportunities for habitat re-creation, increased biodiversity, recreation and connection with the natural environment through restoration of redundant mineral sites.</p> <p>11.f. This should include a reference to improving public connection with the environment.</p> | Updates have now been made in Table 3.1 of the Environmental Report. |
| 72 | 5 | 5.1 | <p>While ADAS is correct in stating that the alternatives should be identified by the Department of Environment (DOE) as the body responsible for writing the plan, we would nevertheless advocate a close working relationship between the DOE, the SEA team and stakeholders in order to develop alternatives that are genuinely alternative and not just slight variations of a 'business as usual' scenario. It is considered that this process will likely be more straightforward for the policy consolidations parts, but where policy is under review, then the environmental consequences will need to be fully explored. We are encouraged that ADAS has suggested that there may be different types of alternatives for the SPPS, as simply having streamline/do not streamline as alternatives would not be sufficient. The key questions posed at 5.1.3 look helpful, and from an SEA perspective 'which policy approach' has the potential to highlight genuine alternatives which will have significant environmental implications. However, we do not consider it satisfactory for ADAS to state that reasonable alternatives will be limited because the existing policy position is likely to remain unchanged. In this regards, one of the benefits of the SEA process is to look for more sustainable solutions, and if such a process generates policy contradictions, then the DOE should be open to looking at alternatives</p> | With agreement from DOE, ADAS has developed a best practice alternative derived from innovative and eco-friendly aspects of Scottish, English and Welsh planning policy (representing a substantial variation from the other strategic alternatives). The alternatives are considered and assessed in Chapter 4 of the Environmental Report, including against SEA Objectives and Ecosystem Services. |

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| 73 | 6 | Chapter 6 | We would wish stress that although this is presented as a linear process, it needs to be an iterative process in order to maximise its benefits. In this regard, we would expect the environmental report to show the iterations that have already taken place i.e. the impact that the SEA has made on the drafting. Transparency in this process is crucial. | This will be addressed in January. |
| Organisation and Contact: Council for Nature Conservation and the Countryside (Patrick Casement, Chairman) Date received: 18th November 2013 | | | | |
| 74 | 1 | 1.3.6 | While we appreciate that this list is copied from the papers on the SPPS produced by the DoE, we suggest that the final bullet point 'Other' should be disaggregated to its individual subjects to make clear that these are separate topics. This is only a list of subject policies that the SPPS is 'likely to include'. | The December draft of the SPPS disaggregates 'other' into its individual subjects, and each of these has been assessed through the SEA process. |
| 75 | 1 | 1.4 | Given that we will have a Marine Planning regime from 2015 which will need to be co-ordinated with the terrestrial regime, we suggest that there is need for a reference here to the coastal zone which will form the transition between the two regimes and will be where problems could be experienced if they lack integration. | This has now been included in Section 1.4 of the Environmental Report. |
| 76 | 1 | 1.4.4 | We suggest that this table should also include Local Nature Reserves, Country Parks and Sites of Local Nature Conservation Interest. We note that there are only 8 NNRs recorded, while there are many more NRs that should be designated as such but have not yet been progressed. Finally we suggest that the table should carry a note to point out that there is significant overlap between designations, with all SACs and most SPAs designated as ASSI for example. | This has now been updated in Section 1.4 and Table 1.2 of the Environmental Report. |
| 77 | 1 | 2.5.4 | We suggest that this list should include the following: · Marine Act 2013 · DARD Agri-Food Strategy · NI Biodiversity Strategy · Wildlife and Natural Environment Act 2011 (lays a Biodiversity Duty on public bodies though the DoE guidelines on what this constitutes remain unpublished). We would also point out that the NI Tourism Strategy remains in draft. | The list at Section 2.5.4 of the Scoping Report contains only plans and programmes with potential for adverse in-combination effects. Additional plans and programmes were included in Appendix A of the Scoping Report. Legislation has not been assessed through this SEA. |
| 78 | 2 | 3.2.3 | See note above concerning NNRs and NRs - we suggest a clarification from NIEA on their intention with regard to NR . In addition the Strangford Lough MNR became a Marine Protected Area following the enactment of the Marine Act earlier this year. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Ecology and Nature Conservation. |
| 79 | 2 | 3.2.5 | We would suggest that a different example is chosen for invasive species – willow coppice is an alien species, but is not invasive: its spread is due solely to deliberate planting. Himalayan Balsam spreading along our watercourses might be a better example. | This has now been amended in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Ecology and Nature Conservation. |
| 80 | 2 | 3.2.12 | We suggest that the final sentence should read '... farmers are reluctant to join, or have dropped out of, agri-environment schemes...' | The modification is noted. The Environmental Report does not repeat this information. |

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| 81 | 2 | 3.2.14 | The agro-forestry sector has taken significant steps to address GHG emissions in the past two years, setting up a GHG Implementation Partnership to put a mitigation strategy into practice. See http://www.dardni.gov.uk/print/efficient-farming-cutsgreenhouse-gases-brief-outline.pdf for further details. We suggest that the last sentence should read '...could increase further due to greater farm intensification as planned under the AgriFood Strategy and an increase in on-farm AD...' | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Climate Change and Air Quality. |
| 82 | 2 | 3.2.15 | We suggest amending the second sentence to read '...for recreation and tourism, but they have become increasingly eutrophic.' | The modification is noted. The Environmental Report does not repeat this information. |
| 83 | 2 | 3.2.16 | We note the inclusion of this statement about marine ecosystems, though the SPPS does not appear to cover the marine environment. | The December draft of the SPPS covers the marine environment, including the need for Marine Plans as well as linking it with the terrestrial planning regime, through PP-2 on Coastal Development. Coverage through natural heritage (PP-9) has been recommended in the enhancements section of the Environmental Report (Section 7.3). |
| 84 | 2 | 3.2.17 | We suggest an additional sentence at the end of this paragraph: 'Its preparation has proved a contentious process with a sharp divide between the approaches of Government and the NGO sector.' | The modification is noted. The Environmental Report does not repeat this information. |
| 85 | 2 | 3.4.4 | We suggest that stress should be laid on the importance of a high quality natural environment to public health, both physical and mental. A serious issue in Northern Ireland is the lack of public access to green space. There is no public footpath network, no access to unenclosed land and no right of coastal access, all of which are now available and taken for granted in Great Britain. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Health and Quality of Life. |
| 86 | 2 | 3.5.2 | We suggest that mention is made here of the land tenure system in NI, with a very large number of small owner-occupied farms, the lack of tenant farming, and the letting of about one third of farm area through conacre (11 month) agreements. Provision of figures for the number of holdings and their average size would be useful, and give an idea of the difficulty of achieving any objectives on a landscape scale in NI. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Soil and Land Use. Figures have not been obtained. |
| 87 | 2 | 3.5.4 | The term 'soil quality' may need definition here – does this refer solely to phosphorous, or does it include other elements. We would have welcomed a statement on soil carbon levels – NI has some of the highest levels in Europe. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Soil and Land Use. |

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| 88 | 2 | 3.5.6 | We suggest mention of perhaps the most important feature of peatland: its role as a carbon store, and potential as a C-sequestrator. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Soil and Land Use. |
| 89 | 3 | 3.5.9 | We suggest that there should be a qualifying statement on AE schemes. They have unfortunately not had clear environmental targets, and most have not been well monitored to ensure that they produce genuine environmental outcomes. | As of December 2013, final decisions on the future AE schemes has not been made by DARD. Nevertheless this comment has been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Soil and Land Use. |
| 90 | 3 | 3.5.14 | We suggest amending the first sentence to read '...the most geologically and geomorphologically diverse regions....'. We suggest that the second sentence might read 'Notable sites include the karst landscape and caves at Marble Arch, the Giant's Causeway and its basalt cliff backdrop, the Antrim Coast road, the Ring of Gullion, the drowned drumlin landscape of Strangford Lough and the Mountains of Mourne'. | This has now been amended in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Soil and Land Use. |
| 91 | 3 | 3.5.16 | We suggest that this paragraph should include reference to the numbers of single houses in the countryside. While there is a tradition of non-nucleated settlement in Ireland, the level of development in the 2000s was remarkable. In 2006 there were more single dwellings in the countryside approved for NI than for all of Great Britain. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Soil and Land Use. |
| 92 | 3 | 3.6.8 | Another slightly anomalous paragraph on the marine environment. Given the importance of the coast as the meeting point of the two planning regimes we suggest a separate section on Coast at this point. Apart from water quality there are important planning issues ahead on the bringing ashore of offshore renewable energy, oil exploration and possible exploitation, sea-level change and coastal protection, and tourism-related developments. The absence of Shoreline Management Plans in NI should also be highlighted. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Water. |
| 93 | 3 | 3.6.11 | We suggest that there is some attempt at a breakdown of water pollution incidents – this covers a wide range of different categories, including nutrients causing eutrophication or de-oxygenation, and highly toxic substances causing mass kills of fish, invertebrates and even vegetation. | The modification is noted, however the Environmental Report does not repeat this information. |
| 94 | 3 | 3.8.1 | An increase in extreme weather events, including heavy rainfall and storms, is also predicted. The most obvious result of climate change will be a rise in sea levels, which will have a significant effect on many parts of the coast, and will have major implications for planning on the coast, including the need for managed retreat, which is an issue that is never discussed here. We suggest a paragraph on coastal processes should be included in Section 3.8. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Water and Climate Change. |

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| 95 | 3 | 3.8.11 | We suggest that the impact of the 'rural nature of Northern Ireland' is exacerbated by planning policies that have favoured single dwellings in the countryside. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Climate Change. |
| 96 | 3 | 3.8.12 | We suggest that there should be some mention of proposals for shale gas extraction in the west of the province. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Climate Change. |
| 97 | 3 | 3.9 | We believe that there is some major omissions in this section with no mention of either shale gas (currently being investigated in Co. Fermanagh) or oil (already found in North Antrim, and with further exploration around Rathlin Island). In addition a major geothermal resource has recently been identified in North Antrim. Less tangible assets such as wind, tidal power, and wave energy have also been omitted, but their exploitation is likely to be a major planning issue in the future. | This has now been included in the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Material Assets. |
| 98 | 3 | 3.11 | Given that NIEA have commissioned a Seascape Character Assessment for NI, which is due to be published in November 2013, we suggest that this section should be titled 'Landscape and Seascape'. | This sustainability topic has been renamed as requested. |
| 99 | 4 | 3.11.2 | We would like to point out that the World Heritage Site and its important wider setting receive no special protection in law, and though there is some protection afforded by PPS 6 Planning, Archaeology and Built Heritage, but not in PPS 2 Planning and Natural Heritage), and in the Draft Northern Area Plan (still not formally adopted and about to become out of date), these have failed to provide adequate protection from inappropriate development. As a result there is a strong possibility that the WHS could be placed on the Endangered List by UNESCO. We suggest that the SEA should address the issue of statutory protection for this iconic site, and that this should be identified in the Scoping Report. | This has now been addressed through the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Landscape. |
| 100 | 4 | 3.11.3 | Note that these AONBs have no statutory management plans and are therefore not equivalent to those in England and Wales. NI's AONBs also fail to qualify as Protected Areas under IUCN definitions. The objectives outlined in the final sentence are therefore purely aspirational, and we suggest that the words 'as aspirations' should be included after '...nature conservation...' | This has now been addressed through the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Landscape. |
| 101 | 4 | 3.11.4 | We would point out the all-important Supplementary Planning Guidance to PPS 2 has not been issued. We believe that without this the PPS is only partially effective. | The modification is noted, however the Environmental Report does not repeat this information. |
| 102 | 4 | 3.11.5 | We suggest that the second sentence should read 'Discussion about the possibility of creating national parks have stalled due to high levels of opposition from farmers and landowners. | The contentious debate about National Parks has been deliberately omitted from the Environmental Report. |
| 103 | 4 | 3.11.6 | We suggest that another paragraph is added here on the 2013 Seascape Character Assessment. Details can be obtained from NIEA. | The suggestion is noted, however the Environmental Report does not discuss Character Assessment. |

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| 104 | 4 | 3.11.10 | We are surprised that two of the biggest planning issues with regard to landscape have been omitted here. These are single houses in the countryside (and their associated infrastructure) and windfarms/single wind turbines. The latter have already completely altered landscapes in County Tyrone particularly, and the planning system (not to mention NIEA) is stretched to the limit to deal with the flood of applications. | This has now been addressed through the Summary of Baseline Data (Section 2.4 of the Environmental Report) under Landscape. |
| 105 | 4 | 3.12 | We warmly welcome the inclusion of this section. | Comment welcomed. |
| 106 | 4 | 3.12.5 | We again welcome the inclusion of reference to the coast. We suggest that the issue of sea level rise and its effect on the coast is mentioned here. | This has now been addressed through the Summary of Baseline Data (Section 2.4 of the Environmental Report) under GI & ES. |
| 107 | 4 | 3.12.8 | We suggest that mention is made of the changes to the Forestry Act made in 2010 which altered the remit of Forest Service to include social and environmental objectives in addition to the existing commercial ones. | This has now been addressed through the Summary of Baseline Data (Section 2.4 of the Environmental Report) under GI & ES. |
| 108 | 4 | 3.12.10 | We suggest that an increase in awareness about GI is also essential. | GI is incorporated into CPP-2 of the December draft of the SPPS. An increase in awareness has been recommended in the enhancements section of the Environmental Report (Section 7.3). |
| 109 | 4 | 3.12.11 | We would point out that protection for the environment provided by the published PPS 16 are weaker than those proposed in the draft document. | The modification is noted, however the Environmental Report does not repeat this information. |
| 110 | 4 | 3.13.2 | Health and Quality of Life. We suggest an additional bullet point : · Access to green space. Soil and Land Use Final bullet point – the LFA (which is subdivided into the Severely Disadvantaged Area and the Disadvantaged Area) will probably be replaced by an Area of Natural Constraint under the 2014/15 changes to the CAP. This will cover an area broadly similar to the SDA, but will exclude much of the DA. | The modification for LFA is noted, however the Environmental Report does not repeat this information as it is still an area of uncertainty. |
| 111 | 5 | Table 4.1 | We believe that this table is an excellent summary of the vital objectives of the SEA, providing an excellent basis for the full assessment. | Comment welcomed. |
| 112 | 5 | Objective 1 | We would have liked to see a sub-objective that covered benefiting biodiversity in the wider countryside, or at least highlighted the need to deliver the Biodiversity Duty set out in the Wildlife and Natural Environment Act 2011. | This has now been included in Table 3.1 of the Environmental Report. |
| 113 | 5 | Objective 4 | We have some concern that sub-objective (c) as phrased gives an impression that coastal protection is the only way in which to deal with coastal processes. We believe that full recognition must be given to other solutions such as managed retreat. | This has now been modified in Table 3.1 of the Environmental Report. |

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| 114 | 5 | 5.1.3, 5.1.4 | We welcome the proposed dialogue between DoE, stakeholders and the SEA team, and trust that it will continue from the promising start at the event on the 2nd October 2013. Our only concern is over how alternatives will be judged to be 'reasonable', and who will make this judgement. We would prefer that the SEA team would act as an arbiter in this process when there is clear disagreement between the DoE and stakeholders. | DOE will have final say over whether alternatives are reasonable, and have emphasised that the purpose and scope of the SPPS is to consolidate extant planning policy, not to re-write it. The SEA team has nevertheless proposed a best practice alternative (in Section 4.3 of the Environmental Report) and suggested enhancement measures (Section 7.3). |
| Organisation and Contact: Environmental Protection Agency (Tadhg O'Mahony, SEA Section) Date received: 22nd November 2013 | | | | |
| 115 | 1 | General | A number of key environmental issues from a transboundary perspective that merit particular attention in the SEA include water quality, climate change & greenhouse gas emissions, landscape, biodiversity/flora/fauna, and the inter-relationships between these topics. These issues should be assessed taking into account trans-boundary considerations and likely significant effects which may arise. There would be merits in exploring potential for further collaboration with cross border Local Authorities/Regional Authorities etc. (Waste, Water Wastewater) in border areas to facilitate sustainable development in a transboundary context. The role and contribution of the proposed Policy Statement in addressing these challenges would need to be explored and elaborated in the strategic environmental assessment and environmental report. | These transboundary issues are mentioned in Key Issues and Likely Future Trends (Section 2.5.4 of the Environmental Report) and in the assessments of impacts and cumulative effects (Sections 5.1 and 5.3), whilst enhancements have also been recommended (Section 7.3). |
| 116 | 1 | General | The potential for cumulative/in-combination and trans-boundary effects in the context of both the SEA Directive and the Habitats Directive-Appropriate Assessment is of particular relevance. Where likely significant effects are identified, appropriate mitigation measures would need to be considered and included in the SEA and in the Plan. The relationship of the Plan with other Plans and Programmes should also be considered. From a transboundary context, a number of key Plans/Programmes/Strategies (across various sectors under the remit of the SEA Directive) to be considered in the preparation of the Plan are listed in the Appendix I of this submission. | The relationship of the SPPS with other plans and programmes is considered through Section 2.3 and Appendix C of the Environmental Report, as well as through the Cumulative Effects Assessment (Section 5.3). |