

RSES Submissions,  
NWRA,  
The Square,  
Ballaghaderreen,  
Co. Roscommon.  
F45 W674  
Ireland

07 February 2019

Dear Sir/ Madam,

**RE: Draft Northern & Western Regional Spatial & Economic Strategy - SEA  
Statutory Consultation and Natura Impact Report**

**General Comments**

Thank you for your email dated 20<sup>th</sup> November 2018. The Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA) and Department for Communities Historic Environment Division (HED) has considered the consultation and associated documents and our opinions are set out below.

**Natural Heritage Directorate comments**

**SEA Environmental Report**

We welcome 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. We also welcome the identification of mitigation measures to reduce impacts identified within the Environmental Report, including any transboundary impacts with Northern Ireland.

Referring to Table 5.4, page 68, the 'Biodiversity' section, note that the number of ASSIs in Northern Ireland has increased to 394. Note also that DAERA is currently consulting on 2 additional Ramsar sites: Derryleckagh proposed Ramsar and Teal Lough proposed Ramsar.



The SEA should include an assessment of the impact of wind energy on bats, including potential transboundary impacts.

Page 255, Table 9.3, Proposed Environmental Monitoring, proposes that an indicator for monitoring will be the condition of European sites (carried out on a 6 yearly basis by NPWS). If there is an intention to include Northern Ireland within the monitoring, relevant reports can be found on the JNCC website as follows: UK Article 17 report for the Habitats Directive <http://jncc.defra.gov.uk/default.aspx?page=6397> and the UK Article 12 report for the Birds Directive <http://jncc.defra.gov.uk/default.aspx?page=6526>.

### Natura Impact Statement

It is noted that the overarching mitigation strategy is that LSEs will be considered fully at project level during pre-planning design and AA. The overall strategy responds to the level of detail available at RSES level.

A number of Regional Policy Objectives (RPOs) are identified for the protection of Natural Heritage and the Natura 2000 network are identified on page 99 of the NIR. It is recognised that RPO83 is an overriding objective in terms of AA and requires that any strategy, programme, plan or project arising from or influenced by the NWRA RSES be subject to the requisite environmental assessments including AA.

Referring to Table 8.1, page 104, it is noted and welcomed that the chapter on all Ireland cohesion includes mitigation measures *"to ensure that the potential for adverse effects is addressed in a coherent manner"* and that *"Any plans or programmes that stem from all island cohesion will be subject to appropriate environmental assessment"*.

On p27, reference to alterations in air quality, focuses on burning of fossil fuels but should include an assessment of the potential impact of nitrogen deposition as a result of ammonia emissions stemming from agriculture; including potential transboundary impacts.

It should be made clear in Table 6.2 Potential Ecological Effects Associated with the Policy Objectives Outlined in the draft NWRA, under the column 'Impact Prediction' that impacts on European sites, for example from 'Economy and Employment – Vibrant Region' or 'Connectivity – Connected Region' may have an impact on European sites, not only in the Republic of Ireland, but also in Northern Ireland.

Table 8.1 on page 100 of the NIR details how Mitigation Measures/ Recommendations have been addressed in the final RSES.



Given the fact that it is acknowledged that transboundary impacts can extend beyond the normal 15km buffer during Appropriate Assessment eg via hydrological and hydrogeological pathways, a map of European sites in Northern Ireland which could potentially be impacted should be included in the Natura Impact Statement. The statement should also consider migratory birds in terms of potential transboundary impacts in N. Ireland.

Given the potential for transboundary impacts on European sites, the Natura Impact Statement should refer to the status of habitats and species in the relevant reports available on the JNCC website as follows: UK Article 17 report for the Habitats Directive <http://jncc.defra.gov.uk/default.aspx?page=6397> and the UK Article 12 report for the Birds Directive <http://jncc.defra.gov.uk/default.aspx?page=6526>.

### **Climate Change Unit Comments**

Please note that on page 67, text used is out of date. The text on page 116 is correct and up to date.

The IPCC Report 2014 report is referred to – you may wish to refer to the most recent IPCC Report : IPPC Special Report on Global Warming of 1.5°C – published October 2018.

### **Air & Environmental Quality Team Comments**

On page 44 of the SEA Environmental Report and also appendix A of the Natura Impact Report, the most up-to-date air quality information can be found on the Northern Ireland Air website see link

NIEA is an agency within DAERA. The Air and Environmental Quality unit sits within DAERA and not NIEA.

On Page 67 there are 19 Air Quality Monitoring stations in Northern Ireland rather than 22.

In addition to the comment above, on page 67 there is the following text:

"Agricultural emissions of ammonia still remain high and threaten ecosystems and habitats, with 93% of emissions coming from livestock in 2016 and 7% from application of fertilisers. Livestock emissions increased 7% between 2001-2016, while ammonia emissions from nitrogen fertiliser have seen decreases of 32% over the same period".



Please note that: 94% of ammonia emissions in Northern Ireland are from agriculture, of these ammonia emissions 93% are from livestock and 7% are from fertiliser. The figures on livestock emission increases and fertiliser decreases since 2001 are correct in the text however it should be noted that the total agriculture ammonia emissions increase in the 2001 to 2016 period was 2.7%

### **Marine & Fisheries Division Comments**

We welcome the references to the marine area and its aspects in contributing to the Strategy and note evidence of marine aspects being considered in the Environmental Report.

The references within the Strategy document to the integration of land and marine planning within the region and with Northern Ireland is particularly welcomed. Likewise the aspiration to create a Marine Resource Innovation Park at Greencastle to increase aquaculture and seafood growth in the marine economy.

Given RPO 56 and supporting narrative, the references to Northern Ireland terrestrial planning documents (Regional Development Strategy and the Strategic Planning Policy Statements) and the shared waters of Lough Foyle, we would suggest more specific of references to the transboundary marine issues within the Environmental Report.

The lack of reference to the Northern Ireland marine policy documents, such as the UK Marine Policy Statement and the draft Marine Plan for Northern Ireland, would provide context for a full consideration of transboundary marine aspects within the Environmental Report and the Strategy. The inclusion and consideration of these documents was raised in our previous response on the Scoping Report (see attached response) and should be taken into account within the SEA Environmental Report (Chapter 4) and listed in the Appendices under review of Regional level Plans, Programs and Policies.

More broadly, it is noted that managing impacts on diadromous fishes is perhaps not fully dealt with. Salmon, sea trout and eel populations are all experiencing low survival at sea. The commitment in regional policy objective 6 to review, and where necessary amend, the RSES upon adoption of the Marine Spatial Plan (MSP) to ensure coordination which supports the protection of the marine environment will be strengthened by recognising this transboundary issue. Activities that exacerbate fish passage problems through the Erne and Foyle estuaries would mainly impact fisheries in NI.



**Department for Communities- Historic Environment Division (HED) Comments**

Historic Environment Division are grateful for the opportunity to review the information via the links provided and we welcome this inclusion of reference to the shared border and transboundary issues notably on the Ulster Canal and Black Pigs Dykes within NI. HED recognise that impacts to heritage assets and their settings will be more clearly assessable at the project specific stage, and welcome the opportunity to provide further comment at that stage. However, HED have a nil return regarding the Draft Northern & Western Regional Spatial & Economic Strategy at this time.

Please contact the SEA Team at [seateam@daera-ni.gov.uk](mailto:seateam@daera-ni.gov.uk) should you have any queries or require clarification.

Yours sincerely,

  
Dr Georgina Thurgate  
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Natural Environment Division



