



Special EU Programmes Board (SEUPB)

Strategic Environmental Assessment (SEA) Statement

PEACEPLUS Programme 2021-2027

RSK Project no: MA/663073

RSK



RSK GENERAL NOTES

Project No.: 663073-03-02

Title: Strategic Environmental Assessment (SEA) Statement
PEACEPLUS 2021 - 2027

Client: Special EU Programmes Board (SEUPB)

Date: July 2022

Office: Manchester

Status: Final

Author	<u>Nisha Rehm</u>	Technical reviewer	<u>Rob Edwards</u>
Date:	<u>20 July 2022</u>	Date:	<u>20 July 2022</u>

RSK Environment Ltd (RSK) has prepared this report for the sole use of the client, showing reasonable skill and care, for the intended purposes as stated in the agreement under which this work was completed. The report may not be relied upon by any other party without the express agreement of the client and RSK. No other warranty, expressed or implied, is made as to the professional advice included in this report.

Where any data supplied by the client or from other sources have been used, it has been assumed that the information is correct. No responsibility can be accepted by RSK for inaccuracies in the data supplied by any other party. The conclusions and recommendations in this report are based on the assumption that all relevant information has been supplied by those bodies from whom it was requested.

No part of this report may be copied or duplicated without the express permission of RSK and the party for whom it was prepared.

Where field investigations have been carried out, these have been restricted to a level of detail required to achieve the stated objectives of the work.

This work has been undertaken in accordance with the quality management system of RSK Environment Ltd.

CONTENTS

1	INTRODUCTION	1
1.1	Background and Legislative Context.....	1
1.2	Summary of the SEA Process.....	2
1.3	Purpose of the SEA Statement	3
2	SUMMARY OF HOW ENVIRONMENTAL CONSIDERATIONS WERE INTEGRATED INTO THE PROGRAMME.....	4
2.1	Introduction.....	4
2.2	Environmental Baseline.....	4
2.3	Preparation of the Environmental Report.....	4
2.4	Mitigation Measures	5
3	SUMMARY OF HOW CONSULTATIONS AND THE ENVIRONMENTAL REPORT WERE INTEGRATED INTO THE PROGRAMME	7
3.1	Introduction.....	7
3.2	Initial Stakeholder Engagement	7
3.3	SEA Scoping Consultation	8
3.4	The Public Consultation on the Draft Programme and ER.....	9
3.5	Transboundary Consultation	9
3.6	Modifications to the Programme following Consultation	9
4	CONSIDERATION OF ALTERNATIVES.....	11
4.1	The Process	11
4.2	Outline Summary of Alternatives Considered	11
4.3	Assessment of Alternatives	12
4.4	Reasons for Selection of Preferred Alternative	13
5	MONITORING MEASURES.....	14
5.1	Statutory Requirements.....	14
5.2	Proposed Monitoring Framework	14
6	REFERENCES	21
APPENDICES		
	APPENDIX A: SCOPING CONSULTATION RESPONSES	22
	APPENDIX B: STATUTORY AND PUBLIC CONSULTATION RESPONSES	42

1 INTRODUCTION

1.1 Background and Legislative Context

- 1.1.1 SEA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision making, with a view to promoting sustainable development. The process of SEA was introduced under European Directive 2001/42/EC12 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive) and came into force in 2001.
- 1.1.2 The requirements of the SEA Directive are transposed into Northern Irish domestic law through the Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004 (SR 280/2004). Hereafter referred to as ‘the Northern Ireland Regulations’.
- 1.1.3 In Ireland the enabling legislation is the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (SI 435/2004), as amended in 2011 by SI200/2011, and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 as amended in 2011 (Irish SI 436/2004 and SI 201/2011). Hereafter collectively referred to as ‘the Ireland Regulations’.
- 1.1.4 Also of relevance is the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 1633/2004) (the UK Regulations).
- 1.1.5 The Special EU Programmes Body (SEUPB) has prepared the PEACEPLUS Programme 2021 - 2027. The PEACEPLUS Programme is a new cross-border EU funding programme supporting peace and reconciliation and economic and social development in Northern Ireland and the border counties of Ireland. It builds on and replaces the predecessor programmes of the 2014-2020 PEACE IV and INTERREG VA.
- 1.1.6 The SEA Directive requires SEUPB, as the programming authority, to assess the likely significant effects of its plans and programmes on the environment. SEUPB has instructed RSK Environment Ltd to carry out this process which consists of four main components:
- The preparation of an Environmental Report (ER), where the likely significant effects of the PEACEPLUS Programme are identified and assessed. The ER is the principal document in the SEA process and summarises the likely effects of the Programme on the environment, and measures which would mitigate any significant adverse effects.
 - A consultation on the ER and draft PEACEPLUS Programme with the public, statutory environmental bodies, and any other EU Member State which might be affected.
 - The consideration of the findings of the ER and the consultation process in deciding whether to adopt or modify the draft PEACEPLUS Programme.
 - The publishing of the decision to adopt the PEACEPLUS Programme and how the SEA process influenced the final outcome.

1.2 Summary of the SEA Process

1.2.1 The SEA followed the approach set out in Table 1.1 below, which is based on the guidance produced by the Office of the Deputy Prime Minister (ODPM), Scottish Executive, Welsh Assembly Government and the Department of Environment (DOE) in 2005, in common with other SEA guidance documents.

Table 1.1: Stages in the SEA Process

Stage	Tasks
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope	A1: Identifying other relevant plans, programmes and environmental protection objectives
	A2: Collecting baseline information
	A3: Identifying environmental problems
	A4: Developing SEA objectives
	A5: Consulting on the scope of SEA
Stage B: Developing and refining alternatives and assessing effects	B1: Testing the plan or programme objectives against the SEA objectives
	B2: Developing strategic alternatives
	B3: Predicting the effects of the plan or programme, including alternatives
	B4: Evaluating the effects of the plan or programme, including alternatives
	B5: Mitigating adverse effects
	B6: Proposing measures to monitor the environmental effects of plan or programme implementation
Stage C: Preparing the Environmental Report	C1: Preparing the Environmental Report
Stage D: Consulting on the draft plan or programme and the Environmental Report	D1: Consulting the public and Consultation Bodies on the draft plan or programme and the Environmental Report
	D2: Assessing significant changes
	D3: Making decisions and providing information
Stage E: Monitoring the significant effects of implementing the plan or programme on the environment	E1: Developing aims and methods for monitoring
	E2: Responding to adverse effects

1.3 Purpose of the SEA Statement

- 1.3.1 The main purpose of the SEA Statement is to document how environmental considerations, the views of statutory consultees, and other submissions received during the consultation stages have been taken into account during the preparation of the PEACEPLUS Programme and related monitoring measures.
- 1.3.2 Upon adoption of the Programme, the SEA Statement must be sent to the Consultation Bodies, the public, and where relevant other EU Member States in relation to any transboundary consultations. The SEA statement includes a summary of the following:
- How environmental considerations were integrated into the Programme.
 - How submissions and observations made to SEUPB, consultation outcomes, and the ER were integrated into the Programme.
 - The reasons for choosing the Programme as adopted, in the light of other reasonable alternatives considered.
 - The measures decided upon to monitor any significant adverse effects, as well as any potential unforeseen adverse effects arising from the implementation of the Programme.

2 SUMMARY OF HOW ENVIRONMENTAL CONSIDERATIONS WERE INTEGRATED INTO THE PROGRAMME

2.1 Introduction

2.1.1 Environmental considerations were integrated in the PEACEPLUS Programme through the SEA process. This involved identification of the baseline situation, particularly constraints and sensitivities, as well as assessment of the Themes and Investment Areas within the draft Programme and recommendation of mitigation measures.

2.2 Environmental Baseline

2.2.1 An analysis of baseline information has been carried out to provide an evidence base for current and likely future environmental conditions without the PEACEPLUS Programme. Key environmental and sustainability issues for Northern Ireland and the Border Counties of Ireland have also been identified. This process has been undertaken to identify any potential environmental sensitivities or constraints which need to be taken into consideration in the preparation of the Programme.

2.2.2 Information for this section has been obtained from, in Northern Ireland the Department of Agriculture, Environment and Rural Affairs (DAERA), Northern Ireland Environment Agency (NIEA), Department for Communications (DfC) Historic Environment Division (HED) and Northern Ireland Statistics and Research Agency (NISRA) websites; and in Ireland, the National Parks & Wildlife Service (NPWS) and Environmental Protection Agency (EPA) and other documents as referenced in the ER.

2.2.3 The environmental sensitivities were mapped (Appendix C of the ER) and strengths, weaknesses, opportunities and threats identified for each of eleven sustainability topics. These were fed back to SEUPB through the Scoping Report and draft ER.

2.2.4 The environmental baseline conditions along with responses received during consultation on the Scoping Report and review of other relevant plans and programmes, led to the identification of a number of SEA objectives.

2.3 Preparation of the Environmental Report

2.3.1 The ER was prepared to carry out an evaluation of the likely environmental effects of the implementation and non-implementation of the PEACEPLUS Programme.

2.3.2 The draft Programme was assessed against the SEA objectives. These objectives were used within high level and detailed assessment matrices to ascertain the magnitude of likely effects, the sensitivity or value of the receiving environment (including people and wildlife) and thus the significance of effects of the PEACEPLUS Programme's Themes and Investment Areas.

2.3.3 Assessments of alternatives to the PEACEPLUS Programme as a whole have been undertaken, along with an assessment of likely cumulative effects of the Investment Areas

within the draft Programme and likely in-combination effects of the draft Programme with other plans and programmes.

- 2.3.4 The results of the assessment are detailed in the ER and these have been fed back to SEUPB through the report.

2.4 Mitigation Measures

- 2.4.1 Annex 1 of the SEA Directive requires the Environmental Report to set out ‘*the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme*’. No significant adverse effects were identified in the ER and therefore there is no requirement for mitigation. Nevertheless the mitigation measures were identified in the detailed matrix assessment in order to reduce the potential for adverse, non-significant effects. Table 2.1 details how the proposed mitigation measures have been integrated into the Programme.

Table 2.1: Proposed Mitigation Measures and how they have been Incorporated into the Programme

Proposed Mitigation	How Mitigation has been Incorporated into the Programme
<p>Theme 4 Investment Area 2: Rural Regeneration and Social Inclusion</p> <p>New green infrastructure created or enhanced under this investment area should be sensitively located and public access to sensitive sites avoided.</p> <p>Any potentially adverse effects will be minimised through compliance with legislation, and standard survey and mitigation procedures as part of the planning application process.</p>	<p>In line with Article 22 of the ETC regulations (Regulation (EU) 2021/1059) and Article 9 of the CPR (Regulation (EU) 2021/1060) in order to be funded project must comply with: (1) the horizontal principle of sustainable development and EU environmental policy; and (2) the Directive on the Assessment of the Effects of Certain Public and Private Projects on the Environment.</p> <p>Projects will be assessed to ensure that they meet these criteria at application stage and the Programme Monitoring Committee/Selection Committee will be informed of this Joint Secretariat assessment as part of the decision making process.</p> <p>During project implementation the Joint Secretariat will monitor that the implementation of the projects follows what agreed in the application form.</p>
<p>Theme 5 Investment Area 6: Enhanced Sustainable Travel Connectivity</p> <p>Any potentially adverse effects associated with track upgrades and renewals will be minimised through incorporation of environmental constraints assessment into the scheme targeting process, accompanied by standard survey and mitigation procedures as part of the planning application process.</p>	<p>Track upgrades and renewals do not form part of the actions or outputs to be funded by PEACEPLUS.</p> <p>The investment will be directed towards rolling stock.</p> <p>The performance frameworks sets the outputs and results for the actions supported by PEACEPLUS and the call documentation</p>

Proposed Mitigation	How Mitigation has been Incorporated into the Programme
	will include the eligibility criteria of the actions.
<p>Project Level Environmental Assessments</p> <p>A project level environmental appraisal should be undertaken prior to SEUPB making a final decision regarding the funding of projects. Funding should not be granted to projects that are likely to result in adverse effects without adequate mitigation measures.</p>	<p>In line with Article 22 of the ETC regulations (Regulation (EU) 2021/1059) and Article 9 of the CPR (Regulation (EU) 2021/1060) in order to be funded project must comply with: (1) the horizontal principle of sustainable development and EU environmental policy; and (2) the Directive on the Assessment of the Effects of Certain Public and Private Projects on the Environment.</p> <p>Projects will be assessed to ensure that they meet these criteria at application stage and the Programme Monitoring Committee/Selection Committee will be informed of this Joint Secretariat assessment as part of the decision making process.</p>

2.4.2 Though not a mandatory requirement, the SEA identified potential enhancement measures to maximise the beneficial effects offered by the PEACEPLUS Programme. These are summarised below:

- Promotion of environment related volunteering activities in cross-community and cross-border engagement programmes;
- Support for environment, sustainability and climate themed education programmes;
- Improving the condition of designated sites; and
- Greening of shared spaces.

3 SUMMARY OF HOW CONSULTATIONS AND THE ENVIRONMENTAL REPORT WERE INTEGRATED INTO THE PROGRAMME

3.1 Introduction

3.1.1 Consultation has been carried out on the PEACEPLUS Programme and the SEA throughout its preparation. Table 3.1 below summarises the various consultation exercises undertaken.

Table 3.1: Consultation Dates

Date	Consultation
November 2019 – February 2020	Initial stakeholder engagement
28 September 2020 – 2 November 2020	SEA scoping consultation
10 March - 12 May 2021	Public consultation on draft Programme and ER

3.2 Initial Stakeholder Engagement

3.2.1 A Stakeholder Engagement process took place between November 2019 and February 2020 to help inform the development of the PEACEPLUS Programme. This included 16 public events across the Programme area which were attended by over 1,000 people. A number of specific youth events were also undertaken in addition to this as well as smaller events arranged by umbrella organisations. Further tools to raise awareness of the stakeholder engagement survey included:

- direct email campaign;
- social media campaign;
- website promotion;
- advertising online and in print; and
- PR campaign.

3.2.2 The survey was available to complete online via the survey monkey platform from 10 December 2019 until 28 February 2020. Respondents also had the option to respond to the survey by email or post. A total of 320 valid responses were received (241 organisations and 79 individuals).

3.2.3 Meetings were also carried out with stakeholders from a wide range of sectors at all levels, including statutory agencies, local government, business representatives and community and voluntary organisations.

3.3 SEA Scoping Consultation

- 3.3.1 The first stage of the SEA process is Scoping; this aims to identify the key issues, the main areas of interaction between the Programme and the SEA objectives and set the scope of the SEA. This was completed by RSK and SEUPB in summer 2020, with the findings published in the SEA Scoping Report.
- 3.3.2 The SEA Directive requires authorities with “environmental responsibilities” (hereafter referred to as the Consultation Bodies) to be consulted on the scope and level of detail of the information which must be included in the Environmental Report (Article 5(4)). The Directive does not require full consultation with the public or bodies other than Consultation Bodies until the Environmental Report on the programme is finalised. The Northern Ireland Government has designated the DAERA as the statutory Consultation Body and delivery of this function is led by NIEA.
- 3.3.3 The SEA Scoping Report was issued by SEUPB to the Consultation Bodies on 28th September 2020. These included:
- Northern Ireland:
 - NIEA on behalf of the DAERA;
 - Ireland:
 - EPA;
 - Department of Housing, Local Government and Heritage (DHLGH);
 - Department of Environment, Climate and Communications (DECC);
 - Department of Culture, Heritage and the Gaeltacht (DCHG); and
 - Department of Agriculture, Food and the Marine (DAFM).
- 3.3.4 Scoping consultation responses were received from NIEA, EPA and DECC. Consultation responses on the Scoping Report are reproduced in Appendix A, along with a comment on how they have been accounted for in the preparation of the ER. The scoping consultation comments were taken on board in the production of the ER resulting in:
- Identification of further baseline information;
 - Additional plans and programmes reviewed;
 - Amendments made to the proposed SEA sub-objectives;
 - Additional guidance reviewed;
 - Various points raised taken into consideration in the impact assessment; and
 - Recommendations taken into consideration in development of the mitigation and monitoring measures.

3.4 The Public Consultation on the Draft Programme and ER

- 3.4.1 A consultation version of the Environmental Report (including NTS) was presented for public and statutory consultation over the period 10 March 2021 to 12 May 2021, at the same time as the draft PEACEPLUS Programme. The purpose of this stage was to give the public and the Consultation Bodies an opportunity to express their opinions on the findings of the Environmental Report, and to use it as a reference point in commenting on PEACEPLUS programme.
- 3.4.2 The Environmental Report has been issued to the relevant Consultation Bodies in Northern Ireland and Ireland and made available on the SEUPB website. Consultation responses relating to the SEA and/or environmental aspects of PEACEPLUS Programme were received from the NIEA in Northern Ireland and the EPA, DECC, DAFM and DHLGH.
- 3.4.3 The online survey revealed that over half (52%) of the respondents agreed that the findings from the SEA covered all of the relevant information, while 5% did not agree and 44% did not know. Those that did not agree highlighted further information related to geothermal energy, water quality, public transport, SEA sub-objectives, marine environment, security, net environmental gain, net zero emissions, cumulative impact of developments, HRA and assessment of individual projects.
- 3.4.4 In line with the SEA Directive and Regulations, comments from the Consultation Bodies, members of the public, and other stakeholders were duly noted and considered, and if appropriate addressed in the final ER. The consultation responses are reproduced in Appendix B, along with a comment on the action taken in response to the comments. In response to the consultation comments, the following changes were made to the ER:
- Additional plans and programmes reviewed;
 - Minor corrections made to the ER;
 - Key issues and challenges referred to in Ireland's Environment: An Integrated Assessment 2020 reviewed and incorporated into the ER; and
 - Additional mitigation measure proposed relating to project level environmental appraisals.

3.5 Transboundary Consultation

- 3.5.1 All Consultation Bodies in Northern Ireland and Ireland were consulted. Transboundary impacts on Scotland, Wales or England were thought very unlikely, so these countries were not consulted.

3.6 Modifications to the Programme following Consultation

- 3.6.1 Since completion of the public consultation exercise in May 2021, the key Themes and Investment Areas have remained the same. Minor changes were made to Theme 5 Investment Area 4: Water Quality Improvement Programme, which entailed removing the drinking water elements.
- 3.6.2 In the process of consultation and post consultation it has been clarified that the Green Infrastructure in Theme 4 Investment Area 2 will be minimal and PEACEPLUS will not fund rail tracks under Theme 5 Investment Area 6, but will focus on rolling stock.

3.6.3 Minor technical corrections have been made to the programme that were not the result of public consultation. These corrections have not impacted upon the content of themes or investment areas and therefore do not change the assessment or its outcome.

4 CONSIDERATION OF ALTERNATIVES

4.1 The Process

- 4.1.1 Consideration of alternatives is a key feature of the SEA process as defined by the SEA Directive and the Northern Ireland SEA Regulations. In practical terms, it refers to possible alternative mechanisms for delivering the programme, and the assessment of the impacts of each of these options against the SEA objectives.
- 4.1.2 The UK and Ireland guidance on SEA recognises that it is not for the SEA to decide on the options to be considered. Instead this SEA focuses on the alternative delivery options actually considered in the preparation of the PEACEPLUS Programme; these have been identified by SEUPB, in collaboration with stakeholders and the SEA team.
- 4.1.3 With European funded programmes such as the PEACEPLUS Programme, constraints on what practical alternatives exist are often restricted by the need to comply with pre-determined criteria set at a European level. This can have the effect of limiting the alternatives that are available to the programme makers. The draft Common Provisions Regulation (CPR), ERDF and ETC Regulations include a total of 7 Policy Objectives and 45 Specific Objectives. The draft ETC regulations propose a Specific Objective within the Policy Objective 4 that specifically relates to the PEACEPLUS Programme. The Member States are required to ensure a concentration of funds on a limited number of policy aims, with a well-articulated intervention logic at the outset and measurement of results.
- 4.1.4 The SEA has focused only on the reasonable alternatives that have emerged during the drafting of the Programme. Section 6.2 of the ER describes the ‘strategic’ alternatives, and Section 6.5 explains what the preferred Alternative is and why SEUPB chose to take this forward to public consultation.

4.2 Outline Summary of Alternatives Considered

- 4.2.1 Table 4.1 below summarises the six alternative options that were considered in the SEA process.

Table 4.1: Alternatives Considered

Alternative	Summary Description
Alternative 1 Do Nothing or ‘Zero’ Option	This alternative assumes that the current 2014-2020 Programmes (INTERREG VA and PEACE IV) will run its course and the new PEACEPLUS Programme will not be adopted in Northern Ireland and the Border Counties of Ireland. UK and Irish Government match funding would also be removed.
Alternative 2 Continue with the PEACE IV and INTERREG VA Programmes 2014-2020	This alternative assumes that the current PEACE IV and INTERREG VA Programmes will be extended to the period 2014-2020, with the current priorities continuing.
Alternative 3	The proposals put forward by SEUPB as potential Programme content on 18th June 2020 incorporated 11 of the possible 22 Specific Objectives set out in the draft ERDF Regulations within Policy

Alternative	Summary Description
Draft Proposals as at June 2020	Objectives 1, 2, 3, 4 and 5; the peace and reconciliation Specific Objective specific to the PEACEPLUS Programme within Policy Objective 4; and the Indicative Specific Objectives under the Policy Objective 6 (Interreg Specific Objective 1) of the draft ETC Regulations.
Alternative 4 Other Relevant Specific Objectives not put Forward in the June 2020 Proposals	The draft Regulations include a total of 7 Policy Objectives and 38 Specific Objectives. This alternative considers other Specific Objectives not put forward in the June 2020 draft proposals that could help deliver the aims set out by the EC for (cross-border) cooperation programmes.
Alternative 5 Proposal as Presented in December 2020 - February 2021	Alternative 5 comprises the programme as currently proposed. This proposal incorporated 10 of the possible 22 Specific Objectives set out in the draft ERDF Regulations within Policy Objectives 1, 2, 3 and 4; the peace and reconciliation Specific Objective specific to the PEACEPLUS Programme within Policy Objective 4; and the Indicative Specific Objectives under the Policy Objective 6 (Interreg Specific Objective 1) of the draft ETC Regulations.
Alternative 6 Other Relevant Specific Objectives not put Forward in the December 2020 - February 2021 Proposal	The draft Regulations include a total of 7 Policy Objectives and 45 Specific Objectives. This alternative considers other Specific Objectives not put forward in the December 2020-February 2021 proposal that could help deliver the aims set out by the EC for (cross-border) cooperation programmes.

4.3 Assessment of Alternatives

- 4.3.1 A high level matrix assessment has been carried out on each of these six alternative options against the SEA Objectives. The assessment was also informed by a more detailed assessment of Alternatives 3, 4 and 6.
- 4.3.2 Alternative 1 generally performs the worst in terms of assessment against the SEA objectives because the absence of a programme would be to the likely detriment of the population (incorporating both socio-economic and health), ecology, water and natural capital objectives.
- 4.3.3 Alternative 2 scores positively against the population related objectives of socio-economics and health and quality of life but it would lose some of the more innovation, environmental improvement and green enterprise related objectives. The existing INTERREG programme also includes a greater element of support for capital works, which dependent on exact locations and targeting presents an increased risk of adverse effect on ecology, water and landscape in particular.
- 4.3.4 Alternative 3, 4, 5 and 6 all perform similarly, representing only relatively subtle shifts in the respective programme objectives. The main feature between these scenarios is Alternative 4's more overt support for sustainable energy and transport related infrastructure. This presents greater scope for climate and air related benefits, but

increases the potential for indirect impacts on other objectives including ecology, water and landscape.

- 4.3.5 Alternative 6 presents a balance between other alternatives, the most distinguishing feature being the greater focus on climate resilience and adaptation measures. Whilst this may lead to enhanced performance under the climate SEA objective in particular, some of the other benefits identified under Alternative 3 – 5 may be lost as a result. Overall, the performance of this alternative is not assessed as significantly different to other alternatives but the balance of the scoring by objectives varies to reflect the areas of focus.
- 4.3.6 Alternatives 3 and 5 by comparison are less overtly climate-focused (although Alternative 5 in particular does include some climate related objectives), but have a greater emphasis on the opportunities presented by environmental engagement as a means of delivering the over-arching themes.

4.4 Reasons for Selection of Preferred Alternative

- 4.4.1 Alternative 5 represents the selected chosen strategic alternative. This is on the basis of SEUPB's analysis and community engagement activities which suggests it provides the optimum blend of priorities to maximise performance in terms of supporting and maintaining the peace process whilst also seeking opportunities to support and improve local environments within the programme area.

5 MONITORING MEASURES

5.1 Statutory Requirements

- 5.1.1 Article 10 of the SEA Directive requires SEUPB, as the Managing Authority, to monitor significant environmental effects of implementing the PEACEPLUS Programme. This must be done in such a way as to also identify unforeseen adverse effects and to take appropriate remedial action. Monitoring should commence as soon as the programme is adopted, with annual reporting carried out for the life of the programme. It may be necessary to revise the monitoring programme periodically so that it takes account of new methods and increased understanding of the baseline environment.
- 5.1.2 It is important that any monitoring proposed by the SEA should aim to specifically monitor the impact of the programme rather than monitoring trends in the baseline environment that would have occurred regardless of the programme. In accordance with the Northern Ireland SEA Regulations, monitoring should also focus on aspects of the programme where environmental impacts are predicted to be significant.
- 5.1.3 However, the SEA (as noted in Section 8 of the ER) did not predict any significant adverse effects of the PEACEPLUS programme being implemented. Residual adverse environmental effects of the programme (i.e. after mitigation measures have been adopted) are likely to be negligible.

5.2 Proposed Monitoring Framework

- 5.2.1 Article 10 of the SEA Directive requires SEUPB, as the Managing Authority, to monitor significant environmental effects of implementing the PEACEPLUS Programme. This must be done in such a way as to also identify unforeseen adverse effects and to take appropriate remedial action. As revealed in the ER (Section 7), residual adverse environmental effects of the programme (i.e. after mitigation measures have been adopted) are likely to be negligible only and thus not significant. The ER therefore did not propose specific SEA monitoring measures.
- 5.2.2 The CPR Regulations (Regulation (EU) 2021/1060) state that Managing Authorities must establish a performance framework to enable monitoring, reporting and evaluation of programme progress and performance during its implementation, as well as measuring the overall performance of the Programme. As such it is the central element of the Interreg Programme (ETC Regulations). The performance framework contains all output¹ and result indicators² (common and programme-specific) linked to each selected Specific Objective. For output indicators milestones shall be fixed for 2024 and targets for 2029. For result indicators pre programme baselines are established as well as targets for 2029. Baselines, milestones and targets are expressed in quantitative terms.

¹ Output indicator: an indicator to measure the specific deliverables of the intervention.

² Result indicator: an indicator to measure the effects of the interventions supported, with particular reference to the direct addressees, population targeted or users of infrastructure.

5.2.3 Taking into account the requirement to monitor environmental effects and other regulatory requirements (CPR, ERDF and ETC Regulations), SEUPB proposes the following measures below to assess and monitor the environmental impact.

5.2.4 SEUPB has established the performance framework of the PEACEPLUS programme including output and results indicators that are meaningful for the actions and objectives of PEACEPLUS. This will enable the achievement of the PEACEPLUS programme to be monitored and measures against programme aims and objectives as specified in Table 5.1.

Table 5.1: Performance Framework

Themes	Investment Area	Output Indicators	Result Indicators
Theme 1: Building Peaceful and Thriving Communities	1.1 Co-designed Local Community PEACE Action Plans	PSO1.1 Co-designed PEACEPLUS action plans implemented	PSR1.1 People from different communities engaged jointly in the implementation of local action plans
	1.2 Empowering communities	PSO1.2a Organisations jointly engaged in local level projects	PSR1.2a People from different communities engaged in local level projects
		PSO1.2b Organisations jointly engaged in institutional capacity projects	PSR1.2b Organisations with increased institutional capacity due to their participation in cooperation activities organisations
	1.3 Building Positive Relations	PSO1.3 Organisations jointly engaged in regional level projects	PSR1.3 People from different communities engaged jointly in regional level projects
	1.4 Re-imaging Communities	PSO1.4 Capital shared space jointly developed and implemented	PSR1.4 Participants from different communities engaged jointly within new shared spaces
Theme 2: Delivering Socio-Economic Regeneration and Transformation	2.1 SME Development and Transition	RCO04 Enterprises with non-financial support	RCR03 Small and medium-sized enterprises (SMEs) introducing product or process innovation
		RCO02 Enterprises supported by grants	
		RCO01 Enterprises supported (of which: micro, small, medium, large)	
		RCO90 Projects for innovation networks across borders	
	2.2 Innovation Challenge Fund	RCO07 Research institutions participating in joint research projects	RCR03 Small and medium-sized enterprises (SMEs) introducing product or process innovation
		RCO01 Enterprises supported (of which: micro, small, medium, large)	

Themes	Investment Area	Output Indicators	Result Indicators
		RCO04 Enterprises with non-financial support	
	2.3 Programme Area Skills Development	RCO85 Participations in joint training schemes RCO83 Strategies and action plans jointly developed	RCR81 Completion of joint training schemes RCR79 Joint strategies and action plans taken up by organisations
	2.4 Smart Towns and Villages	RCO116 Jointly developed solutions	RCR104 Solutions taken up or up-scaled by organisations
Theme 3: Empowering and Investing in Young People	3.1 Shared Learning Together Education Programme	PSO3.1 Participations (pupils and young people in youth settings) in Shared Learning Together programmes RCO85 Participation in Joint Training Schemes	PSR3.1 Completion (pupils and young people in youth settings) of Shared Learning Together Programmes RCR81 Completion of Joint Training Schemes
	3.2 PEACEPLUS Youth Programme	RCO85 Participation in Joint Training Schemes	RCR81 Completion of Joint Training Schemes
	3.3 Youth Mental Health and Wellbeing	RCO85 Participation in Joint Training Schemes	RCR81 Completion of Joint Training Schemes
Theme 4: Healthy and Inclusive Communities	4.1 Collaborative Health and Social Care	RCO116 Jointly developed solutions	PSR4.1 Beneficiaries of jointly developed and delivered health and social care solutions
	4.2 Rural regeneration and Social Inclusion	RCO116 Jointly developed solutions RCO01 Enterprises supported (of which: micro, small, medium, large) RCO04 Enterprises with non-financial support	RCR4.2 Participants accessing new rural facilities, enterprises and community services
	4.3 Victims and Survivors	PSO4.3a Participations in interventions in support of victims and survivors PSO4.3b Participations in joint education and training RCO83 Strategies and action plans jointly developed	PSR4.3a Beneficiaries of jointly developed and delivered interventions PSR4.3b Completion in joint education and training RCO79 Joint strategies and action plans taken up by organisations
Theme 5: Supporting a Sustainable and Better Connected Future	5.1 Biodiversity, Nature Recovery and Resilience	RCO37 Surface of Natura 2000 sites covered by protection and restoration measures RCO36 Green infrastructure supported for other purposes than adaptation to climate change	PSR5.1 Number of management units demonstrating a positive change in condition RCR79 Joint strategies and action plans taken up by organisations

Themes	Investment Area	Output Indicators	Result Indicators
		RCO83 Strategies and action plans jointly developed	
	5.2 Marine and Coastal Management	RCO83 Strategies and action plans jointly developed RCO84 Pilot actions developed jointly and implemented in projects	RCR79 Joint strategies and action plans taken up by organisations RCR104 Solutions taken up or up-scaled by organisations
	5.3 Water Quality and Catchment Management	RCO83 Strategies and action plans jointly developed RCO116 Jointly developed solutions RCO32 New or upgraded capacity for wastewater treatment	RCR79 Joint strategies and action plans taken up by organisations RCR104 Solutions taken up or up-scaled by organisations RCR42 Population connected to at least secondary public waste water treatment
	5.4 Water quality improvement programme		
	5.5 Geothermal Demonstration Programme	RCO84 Pilot actions developed jointly and implemented in projects RCO116: Jointly developed solutions	RCR104 Solutions taken up or up-scaled by organisations
	5.6 Enhanced Sustainable Travel Connectivity	PSO5.6 Capacity of rail rolling stock for intercity public transport	PSR5.6a Annual users of upgraded intercity rail public transport PSR5.6b Time savings due to upgraded intercity rail public transport
Theme 6: Building and Embedding Partnership and Collaboration	6.1 Strategic Planning and Engagement	RCO83 Strategies and action plans jointly developed RCO84 Pilot actions developed jointly and implemented in projects RCO87 Organisations cooperating across borders	RCR79 Joint strategies and action plans taken up by organisations RCR84 Organisations cooperating across borders after the project completion
	6.2 Maintaining and Forging Relationships between Citizens	RCO81 Participations in joint actions across borders RCO87 Organisations cooperating across borders	PSR6.2 People with increased capacity in the field tackled by the project due to their participation in cooperation activities RCR84 Organisations cooperating across borders after the project completion

- 5.2.5 For most up to date selection of output and result indicators and information on milestones and targets of the indicators refer to the PEACEPLUS Cooperation Programme (Section 2.1.3).
- 5.2.6 Where the Specific Objective is related to the environment (in particular Theme 5), intervention fields measure the contribution of the Cooperation Programme to climate and environment.
- 5.2.7 The SEUPB has also linked the Investment Areas that will support to the Intervention Fields as set out in Annex I of the CPR (Regulation (EU) 2021/1060). In the CPR the coefficients for the support to climate change and environmental objectives are established. The contribution to these intervention fields will be measured and reported on. The intervention fields for Theme 5 are presented below in Table 5.2³.

Table 5.2: Intervention Fields for Theme 5

Investment Area	Specific Objective	Intervention Field		Coefficient for the Calculation of Support to Climate Change Objectives	Coefficient for the Calculation of Support to Environmental Objectives
5.1 Biodiversity, Nature Recovery and Resilience	SO 2.7 Enhancing protection and preservation of nature, biodiversity, and green infrastructure, including in the urban areas, and reducing all forms of pollution	079	Nature and biodiversity protection, natural heritage and resources, green and blue infrastructure	40 %	100 %
5.2 Marine and Coastal Management	SO 2.4 Promoting climate change adaptation and disaster risk prevention and disaster resilience, taking into account eco-system based approaches	079	Nature and biodiversity protection, natural heritage and resources, green and blue infrastructure	40 %	100 %
5.3 Water Quality and Catchment Management	SO 2.5 Promoting access to water and sustainable	064	Water management and water resource conservation	40 %	100 %

³ For information on the intervention fields of other investment areas please refer to the Cooperation Programme.

Investment Area	Specific Objective	Intervention Field		Coefficient for the Calculation of Support to Climate Change Objectives	Coefficient for the Calculation of Support to Environmental Objectives
	water management		(including river basin management, specific climate change adaptation measures, reuse, leakage reduction)		
5.4 Water quality improvement programme		065	Waste water collection and treatment	0 %	100 %
5.5 Geothermal Demonstration Programme	SO 2.2 Promoting renewable energy in accordance with Directive (EU) 2018/2001, including the sustainability criteria set out therein	052	Other renewable energy (including geothermal energy)	100 %	40 %
5.6 Enhanced Sustainable Travel Connectivity	SO 3.1 Developing a climate resilient, intelligent, secure, sustainable and intermodal TEN-T.	106	Mobile rail assets	0 %	40 %

5.2.8 The progress of all indicators will be closely monitored by the Managing Authority and the Joint Secretariat and it will be reported to the Programme Monitoring Committee and the Commission. Based on the Article 32(1) of the ETC Regulation (Regulation (EU) 2021/1059) the Managing Authority has the requirement to report the progress on the achievement of outputs and results twice a year (31st January and 31st July of each year starting on 31st January 2022). This reporting will be based on the progress reports from the lead partners of the projects and in line with the data collection and time of measurement requirements as per the fiches of each output and result indicator. In addition, at the end of 2024 the Managing Authority will complete a Mid Term review.

5.2.9 During the selection of projects consideration will be given to potential environmental effects of the proposed projects. The Regulations require the Programme Monitoring

Committee to establish and apply project selection criteria ensuring the compliance of the projects with: (1) the horizontal principle of sustainable development and EU environmental policy (Article 22(2) of the ETC and Article 9 of the CPR⁴); and (2) the Directive on the Assessment of the Effects of Certain Public and Private Projects on the Environment (Article 22(4e) of the ETC⁵). Thus, project applications will have to justify how the project complies with the environmental horizontal principle and if required, projects will be subject to an environmental impact assessment or a screening procedure and the assessment of alternative solutions will be taken in due account. Projects which potentially show effects not compliant with EU environmental objectives and with the principles of sustainable development can be screened out or amendments can be demanded by the Programme Monitoring Committee.

- 5.2.10 Without knowing which projects will be supported through the PEACEPLUS programme it is not possible to set thresholds/targets/trigger levels above which remedial action is required. However, the Steering Committee and the Managing Authorities can set conditions for project to complete to be approved. These conditions will either need to be completed before the signature of the grant offer letter or they will be included as part of a clause in the grant offer letter, which has contractual nature. The Joint Secretariat has the responsibility to monitor the projects implementation and flag any risks to the Managing Authority and Programme Monitoring Committee, for them to decide on remedial action. In order to monitor the programme's impact related to the SEA, once a year an agenda item will be included in the meetings of the Programme Monitoring Committee.
- 5.2.11 Furthermore, as per PEACE IV programme project applications are required to provide a full description (if possible) of the anticipated negative impact as well as of the mitigating measures. This relates to the proposal for the capital developments to be funded, which could potentially have adverse effects on ecology, soil, water, cultural heritage and landscape. If mitigation is required to minimise the identified adverse effects of funded capital development projects, the Lead Partner will be responsible to implement and evidence remedial actions. However, it is considered necessary for SEUPB to ascertain whether this mitigation is in fact carried out.
- 5.2.12 Similar to the Interreg VA and PEACE IV programmes, actions such as impact evaluations of the programme will be carried out for the PEACEPLUS programme. Where deemed necessary the impact evaluations will include an assessment of impacts on protected sites, species, biodiversity and the wider environment. The Managing Authority is required to carry out an Evaluation Plan within six months of the programme being adopted. Based on this Evaluation Plan the Managing Authority will contract external evaluators that will objectively assess the impact of the projects and programme.

⁴ *"The objectives of the Funds shall be pursued in line with the objective of promoting sustainable development as set out in Article 11 TFEU, taking into account the UN Sustainable Development Goals, the Paris Climate Agreement and the "do no significant harm" principle. The objectives of the Funds shall be pursued in full respect of the EU environmental acquis."*

⁵ *"Ensure that selected operations which fall under the scope of Directive 2011/92/EU of the European Parliament and of the Council are subject to an environmental impact assessment or a screening procedure and that the assessment of alternative solutions has been taken in due account, on the basis of the requirements of that Directive "*

6 REFERENCES

ODPM (2005) A Practical Guide to the SEA Directive.

EPA (2020) Ireland's Environment: An Integrated Assessment 2020.

APPENDIX A: SCOPING CONSULTATION RESPONSES

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
Organisation and contact: Department of Environment, Climate and Communications - Geological Survey Ireland				
Date received: 16/10/2020				
1	1		<p>Geoheritage The following points are suggested by the Geological Heritage Programme of Geological Survey Ireland, as appropriate ways in which to address the need to protect geological heritage in any one of Ireland's local authority areas: As a minimum, Geological Survey Ireland would like the Local Authority to include a policy objective with wording such as: "to protect from inappropriate development the scheduled list of geological heritage sites [Appendix X]." Or "to protect from inappropriate development the following list of County Geological Sites"</p>	Noted, however SEUPB is not a Local Authority who provides consent for development. Nevertheless geological heritage sites have been included in as a sub-objective in Section 3.3 of the ER.
2	1		The Geological Heritage Programme views the Local Authorities as critical partners in protecting, through the planning system, those CGS which fall within their county limits. In many cases these are often sites of high amenity or educational value, already zoned or listed in the plan. Listing in the CDP provides protection of the sites against potentially damaging developments that normally require planning permission, such as building, quarrying, landfilling or forestry. It is also important that the democratic process of public consultation and approval by councillors of the CDP means that stakeholders in the sites and all the local community can buy into the process.	Noted, however SEUPB is not a Local Authority and the planning system is not within their remit.
3	1-2		CGSs have been adopted in the National Heritage Plan, and will form a major strand of geological nature conservation to complement the various ecological and cultural conservation measures. It is important to note however, that management issues for the majority of geological heritage sites may differ from ecological sites, and in some cases development may facilitate enhanced geological understanding of a site by exposing more rock sections - for example, in a quarry extension. Consultation at the earliest stages can identify any issues relevant to an individual site or proposed development.	Noted.
4	2		County Geological Sites are the optimal way of addressing the responsibility of each authority under the Planning and Development Act 2000 and its amendments, to protect sites of geological interest. It would also be necessary to include a policy	Noted, however SEUPB is not a Local Authority and the planning system is not within their remit.

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
			objective to protect geological NHAs as they become designated and notified to the Local Authority, during the lifetime of the Plan.	
5	2		<p>Culture and Tourism Over the past number of years geology has become a large part of Irish tourism. Ireland currently has three UNESCO Global Geoparks, including the cross-border Marble Arch Caves Global Geopark. This Geopark became the world's first cross-border Global Geopark when it expanded from County Fermanagh into County Cavan in 2008. These Geoparks, along with other tourism initiatives such as the Wild Atlantic Way, Irelands Ancient East, and Irelands Hidden Heartlands have bolstered tourism in various parts of Ireland and helped to increase its levels in areas that were previously not as popular with tourists. We would encourage Local Authorities to continue this trend, and to use the geological audit information making it easily available to the general public. We would encourage geology to be a significant part of any tourism initiative that may be introduced.</p>	Referenced in Section 4.3 of the ER.
6	2		<p>Groundwater With regard to Flood Risk Management, there is a need to identify areas for integrated mitigation and management. Our GWflood project is a groundwater flood monitoring and mapping programme aimed at addressing the knowledge gaps surrounding groundwater flooding in Ireland. The project is providing the data and analysis tools required by local and national authorities to make scientifically-informed decisions regarding groundwater flooding. With regards to Climate Change, there is a need to improve the monitoring capacity of groundwater levels in Ireland so that the potential impacts of climate change can be monitored and assessed. In this context the Geological Survey Ireland has established the GWClimate project in January 2020. GWClimate will 1) establish a long-term strategic groundwater level monitoring network and 2) develop modelling and analytical approaches for evaluating the impacts of Climate Change to Irish groundwater systems. Further information can be found on the Groundwater flooding page of the Groundwater Programme. CatchmentCARE (Catchment Actions for Resilient Eco-systems) is an EU-funded project that aims to improve freshwater quality in cross-border river basins across three cross-border catchments. The aims will be achieved through development of three water quality improvement projects in the Finn, Blackwater and Arney catchments and installation 50 boreholes across the programme area.</p>	Noted.

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
7	3		<p>Geohazards Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. While in Ireland, landslides are the most prevalent of these hazards flooding is becoming an increasing risk. Geological Survey Ireland has information available on past landslides for viewing as a layer on our Map Viewer. Geological Survey Ireland also engages in national projects such as Landslide Susceptibility Mapping and Groundwater Flooding (GWFlood), and in international projects, such as the Tsunami Warning System, coordinated by the Intergovernmental Oceanographic Commission of UNESCO. Historical records and geological evidence indicate that, while tsunamis are unlikely events around Ireland, the Irish coast is vulnerable to tsunamis from submarine landslides and distant earthquakes. Associated levels of coastal flooding are expected to be similar to those seen during storm surges, but with much more energetic inundation and a much shorter time to react. Ireland participates in an international tsunami detection and alerting system, coordinated by the Intergovernmental Oceanographic Commission of UNESCO. We recommend that geohazards and particularly flooding be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.</p>	Addressed in Section 3.3 and 4.3 of the ER.
8	3		<p>Natural Resources (Minerals/Aggregates) Geological Survey Ireland is of the view that the sustainable development of our natural resources should be an integral part of all development plans from a national to regional to local level to ensure that the materials required for our society are available when required. Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our Minerals section of the website. Aggregates are an essential natural resource for the construction industry and with the Government of Ireland “Building Ireland 2040” plan, understanding of aggregate source and supply will be important. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our Map Viewer.</p>	Minerals/aggregates has been taken into consideration in the baseline assessment under Material Assets in Section 4.3 and as a SEA sub-objective in Table 3.2 of the ER.
9	4		<p>Marine and Coastal Unit Our marine environment is hugely important to our bio-economy, transport, tourism and recreational sectors. It is also an important indicator of the health of our planet. Geological Survey Ireland’s Marine and Coastal Unit in partnership with the Marine Institute, jointly manages INFOMAR, Ireland’s national marine mapping programme; providing key baseline data for Ireland’s marine sector. The programme delivers a</p>	Addressed in Section 4.3 of the ER.

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
			<p>wide range of benefits to multi-sectoral end-users across the national blue economy with an emphasis on enabling our stakeholders. Demonstrated applications for the use of INFOMAR's suite of mapping products include Shipping & Navigation, Fisheries Management, Aquaculture, Marine Leisure & Tourism and Coastal Behaviour.</p> <p>Of particular interest to tourism is the extensive database of shipwrecks mapped by the INFOMAR programme, many lost close to the coast and with engaging human interest stories associated with them https://www.infomar.ie/maps/story-maps/shipwrecks. INFOMAR also produces a wide variety of seabed mapping products that enable public and stakeholders to visualize Ireland's seafloor environment https://www.infomar.ie/maps/downloadable-maps/maps. Story maps have also been developed providing a different perspective of some of the bays and harbours of the Irish coastline https://www.infomar.ie/maps/story-maps/exploring-dingle-bay-different-perspective. We would therefore recommend use of our Marine and Coastal Unit datasets available on our website and Map Viewer.</p> <p>The Marine and Coastal Unit also participate in coastal change projects such as CHERISH (Climate, Heritage and Environments of Reefs, Islands, and Headlands) and are undertaking mapping in areas such as coastal vulnerability and coastal erosion. Further information on these projects can be found at here.</p>	
10	4		<p>Tellus</p> <p>Tellus Border was an EU INTERREG IVA-funded regional mapping project collecting geo-environmental data on soils, water and rocks across six border counties - Donegal, Sligo, Leitrim, Cavan, Monaghan and Louth - and continuing the analysis of existing data in Northern Ireland. The project was a cross-border initiative between the Geological Survey of Northern Ireland, the Geological Survey of Ireland, Queen's University Belfast and Dundalk Institute of Technology. To date, Tellus surveying has been completed in Northern Ireland (2004–2008) and the border region of Ireland (2011–2013). Further information on Tellus Border can be found here and in 'Unearthed: impacts of the Tellus surveys of the north of Ireland' publication.</p> <p>Tellus involves two types of surveying – airborne geophysical surveying using a low-flying aircraft and ground-based geochemical surveying of soil, stream water and stream sediment. The Tellus airborne geophysical survey has now mapped 75% of the country.</p> <p>Tellus has established a Product Development workstream in order to produce</p>	Noted.

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
			more focused, user-centric data products, the need for which has been identified through stakeholder consultation, independent reviews of Tellus and government policy. Product development is undertaken under five main themes: mineral prospectively, smart agriculture, environment and health, climate action and education. Tellus is currently undertaken by Geological Survey Ireland and is funded by the Department of Environment, Climate and Communications. All data from Tellus is made available free of charge online here.	
Organisation and contact: Department of Environment, Climate and Communications - Inland Fisheries Ireland				
Date received: 29/10/2020				
11	1		The cross-border region, which is included in the PEACEPLUS Programme 2021-2027, contains a wealth of freshwater habitats supporting stocks of game and coarse fish. Rivers by their very nature provide natural boundaries and their catchment areas and channels cross these boundaries. There are also a significant number of lakes that straddle the border between Ireland and Northern Ireland. These shared waterbodies contain valuable fisheries habitats and support a wide range of aquatic species. They are also a valuable angling resource and contribute significantly to the value of tourism in these areas.	Addressed in Section 4.3 of the ER.
12	1-2		A significant proportion of the floral and faunal biodiversity resource is located outside areas under formal European designation (SAC, SPA, NHA, Ramsar). It is also important to note that while many river systems are not designated under the Habitats Directive, they may hold species that are designated under that directive, e.g. Atlantic salmon (<i>Salmo salar</i>) and lamprey species.	Addressed in Section 4.3 of the ER.
13	2		In determining the likely significant effects of the PEACEPLUS Programme 2021-2027 under the Strategic Environmental Assessment process, regard should be had to the need for the sustainable development of the inland and marine fisheries resource (including the conservation of fish and other species of fauna and flora, aquatic habitats and the biodiversity of inland and marine water ecosystems). Some key issues for consideration in the SEA include: <ul style="list-style-type: none"> • Water quality • Surface water hydrology • Fish spawning and nursery areas • Passage of migratory fish • Areas of natural heritage importance including geological heritage sites • Biological Diversity • Ecosystem structure and functioning 	Addressed where appropriate in Sections 3.3, 4.3, 7.1 and 7.3 of the ER.

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
			<ul style="list-style-type: none"> • Sport and commercial fishing and angling • Amenity and recreational areas 	
Organisation and contact: Environmental Protection Agency				
Date received: 30/10/2020				
14	1-2	Appendix B	<p>We acknowledge Appendix B of the Scoping Report and the comprehensive list of Plans, Programmes and Strategies. In particular we refer to the column which puts the relevant Plan or Programme in the context of the PEACEPLUS Programme. Some key additional relevant plans and programmes in Ireland, at national and regional level to consider include the Regional Spatial and Economic Strategy for the Northern and Western Region, Grid 25 Implementation Plan, National Policy Framework on Alternative Fuels Infrastructure for Transport, Renewable Electricity Policy and Development Framework (SEA ongoing) , National Hazardous Waste Management Plan (SEA ongoing), Regional Waste Management Plan, Grid Implementation Plan, Nitrates Action Programme, National Forestry Programme, the Rural Development Programme, Agri-Food Strategy 2030 (SEA ongoing), National Strategic Aquaculture Plan and Seafood Operational Programme. In addition, local authority County Development Plans for the border region and, where relevant, adjoining counties.</p> <p>Additional plans to consider include Irish Water's Draft National Water Resource Management Plan (in preparation). The relevant flood risk management plans prepared as part of the National CFRAMS programme should also be considered where relevant. Aspects to consider also include the implications associated with implementation of the Maritime Spatial Planning Directive and Ireland's National Marine Spatial Plan.</p>	Addressed in Appendix B of the ER.
15	2		The assessment of the potential for cumulative effects, including possible transboundary aspects will be a key element for consideration.	Addressed in Section 7.5 of the ER.
16	2		The need for appropriate community engagement at key stages in the process will also need considering.	The draft ER is being consulted on.
17	2		In addition, Brexit implications and a need for continued cross-border collaboration will need to be taken into account.	Brexit related challenges to cross-border cooperation to be addressed in the PEACEPLUS Programme
18	2		For the implementation stage an environmental monitoring programme will be required to monitor the effects of implementation in both jurisdictions.	Addressed in Section 9 of the ER.
19	2		<p>Specific Comments on the Programme</p> <p>The Programme should clearly set out the scope, remit and implementation related</p>	To be addressed in the PEACEPLUS Programme

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
			<p>elements. These will have implications for the SEA, in terms of guiding the level of assessment applicable at the appropriate level for the Programme.</p> <p>Where specific measures will be implemented directly via the Programme, further detail should be provided in the Environmental Report and the Programme on the relevant environmental assessments to be carried out at the project stage and relevant mitigation measures to be applied, as appropriate. There may be merit in exploring this issue further with the relevant Environmental Authorities during the Programme preparation and SEA processes.</p> <p>Where it is envisaged that measures proposed in the Programme will be implemented via other plans, which themselves have been or will be subject to SEA, this should be explained in the Environmental Report and taken into account in the assessment.</p>	
20	2-3		<p>Sustainable Development Goals & Key Actions for Ireland</p> <p>EPA's current State of Environment Report Ireland's Environment- An Assessment 2016 (EPA, 2016) identified seven Key Actions for Ireland which align with many of the UN Sustainable Development Goals (SDGs). Delivering Ireland's long-term sustainable development and environmental protection goals will require a concerted effort by government departments to address these key actions. The relevant aspects of these Key Actions and the SDGs should be taken into account in preparing the Programme and SEA and reflected in the principles/objectives/measures in the Programme. This will ensure that the Programme aligns with and contributes to achieving Ireland's sustainable development and environmental protection ambitions.</p>	Addressed in Section 3.3 of the ER.
21	3		<p>We also bring to your attention that the next iteration of the EPA's State of the Environment Report series, Ireland's Environment – An Assessment, is due to be published in November. Once published, this should be reviewed in the context of topic and sector assessments along with the Key Messages, and integrated as appropriate in preparing and implementing the Programme and SEA Environmental Report.</p>	To be taken into account if published within the timeframe of the SEA.
22	4		<p>The potential opportunities for transboundary collaboration, in relation to water bodies or water quality, biodiversity, landscape, air and climate that may arise as a result of implementation of the Programme should be highlighted in the scope of the assessment.</p> <p>It is currently unclear what aspects of the Programme are more likely to potentially have an adverse impact on the environment. While the Scoping report suggests</p>	Addressed in Section 2.2 of the Environmental Report

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
			<p>proposed objectives, it is not clear what activities are proposed or what measures will be taken to ensure they will be achieved in an environmentally sustainable manner.</p> <p>In this context, we suggest including, as appropriate, a summary of some of the key environmental-related activities supported through the last iteration of the PEACE Programmes and likely to continue in the updated PEACEPLUS Programme. This would help set the scene for this new Programme and SEA Process.</p>	
23	4	Section 2.2	<p>Thematic Objectives, while we welcome both objectives of the Programme related to addressing the needs arising from the peace process, and promoting social inclusion, we would also recommend that efforts to boost economic growth and social and economic regeneration are carried out in an environmentally sustainable manner. A clean healthy and well protected environment have multiple benefits economically, socially and for our health and wellbeing.</p> <p>In addition, we welcome that the Programme is being developed in the framework of the five key Policy Objectives, one of which relates to promoting efforts to achieve a greener, lower carbon Europe.</p>	Addressed in Section 2.3 and taken into account in the Programme.
24	4	Section 2.6	<p>Geographic Cover - there is merit in clarifying whether the remit of the Plan extends to the maritime areas in both jurisdictions. Consideration should also be given to the extension of the spatial scope to capture the zone of influence of the Programme outside of the border region.</p>	Addressed in Section 2.10 of the ER.
25	4	Section 3.1	<p>We note the best practice guidance referred to in section 3.1. EPA's website contains various SEA resources and guidance which you may find useful. These include:</p> <ul style="list-style-type: none"> - SEA process guidance and checklists - Inventory of spatial datasets relevant to SEA - Topic specific SEA guidance (including Good practice note on Cumulative Effects Assessment (EPA, 2020), Guidance on SEA Statements and Monitoring (EPA, 2020), Integrating climatic factors into SEA (EPA, 2019), Developing and Assessing Alternatives in SEA (EPA, 2015), and Integrated Biodiversity Impact Assessment (EPA, 2012)) 	Noted and taken into account.
26	5	Chapter 4	<p>Baseline Data</p> <p>We refer you to the various environmental reports published annually (air, water quality etc.) on our website available at http://www.epa.ie/pubs/reports/. These should be taken to take into account as appropriate.</p> <p>Additionally, we also have a number of useful spatial data resources</p>	Information sources have been used in gathering baseline data where relevant.

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
			http://www.epa.ie/pubs/advice/ea/seaspatialinformationsourcesinventory.html that may also be useful to you in preparing the SEA and the Programme. Environmental Sensitivity Mapping (ESM) WebTool EPA SEA WebGIS Tool EPA WFD Application EPA AA GeoTool	
27	5	Section 4.12	In Section 4.12.9, regarding designated landscape, we would also suggest that reference is made to the National Landscape Strategy. In addition, the Marine Institute have published a draft Seascape Character Assessment which would be useful to take into account in developing the Programme.	Addressed in Section 4.3 of the ER.
28	5	Section 4.13	Section 4.13.9 relating to the Comhar Sustainable Development Council (SDC) should be updated to reflect that Comhar is no longer in existence. We suggest consultation with the Department of Housing, Local Government and Heritage and NPWS regarding more recent information and recommendations relating to green infrastructure.	Addressed in Section 4.3 of the ER.
29	6	Section 4.14	We acknowledge that Section 4.14 sets out the key environmental and sustainability issues and likely future trends for the Programme. It may be useful to identify the key national level policy commitments responsible for protecting these environmental aspects in both jurisdictions in the context of ensuring the Programme aligns with these.	National level policy commitments have been identified in Appendix B through the review of plans and programmes.
30	6	Section 4.14	Under Ecology and Nature reference could also be made to ecosystem services. Coastal and marine habitats should also be captured. There may be relevant mapping available for the Programme area. There would be merits in reviewing the most recent in the EPA's Water Quality in Ireland series of reports. In addition, there would also be merit in reviewing the relevant aspects of Ireland's Habitats Directive Article 17 Report- the Status of EU Protected Habitats and Species in Ireland (https://www.npws.ie/publications/article-17-reports). In the area of Natural Capital, NPWS and the Irish Forum on Natural Capital may be in a position to provide insights into the current situation in Ireland. Aquaculture may also be an aspect for consideration both in a freshwater and the coastal /marine context including the Loughs.	Addressed in Section 4.3 of the ER.
31	6	Section 4.14	Under Air Quality, Climate Change and Material Assets, flooding and coastal erosion should also be included for consideration.	Addressed in Section 4.4 of the ER.
32	6	Section 4.15	Information Gaps, given the high-level nature of the Programme, we suggest that the SEA Environmental Reports for the National Planning Framework, National	Information sources noted.

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
			Marine Planning Framework, the WFD -River Basin Management Plan, the relevant Flood Risk Management Plans, Grid Implementation Programme and for the Northern and Western Regional Spatial and Economic Strategy be considered, as appropriate. In addition, you are referred to the environmental datasets at http://www.epa.ie/pubs/advice/ea/seaspatialinformationsourcesinventory.html .	
33	6	Section 5.1	Chapter 5- SEA Framework Under Soil and Land Use consider a sub-objective related to soil erosion. Under Climate Change consider including a sub-objective on coastal erosion. In addition, the potential of drought in future climate scenarios should be considered. Material Assets- consider as appropriate critical infrastructure such as grid, transport corridors (rail and road), gas, water and waste water.	Addressed in Section 3.3 of the ER.
34	6	Section 6.2	From the information provided, Alternative 3, the proposals put forward by SEUPB as potential Programme content on 18th June 2020 would appear to be the preferred alternative for the PEACEPLUS Programme. Confirm that this is the case and it is this option that will be taken forward to more detailed assessment.	Alternative 5 is currently the preferred option (and performs very similarly to 3 environmentally). Hence this is the alternative assessed in full. A further assessment of the alternatives is now provided in Section 6 and Appendix E of the ER.
35	6	Section 7.3	There is merit in clarifying what mitigation measures and controls are in place to minimise or avoid the potential adverse significant environmental effects identified in the SEA. We also recommend that the objectives of the Programme align with efforts to contribute to achieving the UN Sustainability Development Goals.	Addressed in Section 8 of the ER.
Organisation and contact: Department of Agriculture, Environment and Rural Affairs - Northern Ireland Environment Agency				
Date received: 02/11/2020				
36	1	Appendix B	In respect to Other Plans and Programmes the existing area plans and emerging Local Development Plans (LDPs) should be considered.	Addressed in Appendix B of the ER.
37	1	Section 3.2	Natural Environment Division (NED) Comments NED is content the sub topics relating to Ecology and Nature Conservation cover the areas of the natural environment which may be significantly impacted by this programme.	Noted.
38	2	Section 3.4	Spatial and Temporal Scope The scoping in of transboundary issues is welcomed. NED would like the SEA Environmental Report to contain a clear statement indicating the opinion about whether or not the implementation of the of the strategy is likely to have a significant	Addressed in Section 7.5 of the ER.

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
			effect on Northern Ireland natural heritage, in combination with any identified measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment.	
39	2	Table 6.2	Supporting a Sustainable and Better Connected Future NED is in agreement that potential for adverse effects from infrastructure development and renewable energy development and will require further investigation in the Environmental Report.	Addressed in Section 7 of the ER.
40	2		A number of useful information sources that highlight the current state of the environment in Northern Ireland at a regional level and which could be referenced in appendix B are: Northern Ireland State of the Environment Reports: https://www.daerani.gov.uk/publications/state-environment-report-2013 Northern Ireland Environmental Statistics Reports: https://www.daerani.gov.uk/articles/northern-ireland-environmental-statistics-report Other relevant web-links are; Designated Scientific Sites: www.daera-ni.gov.uk/landing-pages/protected-areas Regional Landscape Character Map viewer: https://www.daerani.gov.uk/services/regional-landscape-character-areas-map-viewer DAERA have a map browser for NI protected sites and known priority habitat: www.daera-ni.gov.uk/services/natural-environment-map-viewer DAERA digital datasets of natural heritage features can be downloaded: www.daera-ni.gov.uk/articles/download-digital-datasets	Information sources have been used in gathering baseline data where relevant.
41	2	Appendix B	Marine Plan Team Comments: Other Plans, Programmes and Conservation Objectives The inclusion of the draft Marine Plan for Northern Ireland and UK Marine Policy Statement within the review of other plans, programmes and environmental protection measures of Annex B is welcomed. However, given these documents cut across a number of the SEA/SA topics identified, restricting them under the Water topic appears to limit the consideration of marine aspects under other topic areas. It is further advised that consideration should be given to including the EU Maritime Spatial Planning Directive and the EU Marine Strategy Framework Directive within Annex B.	Addressed in Appendix B of the Environmental Report
42	3	Section 3.3, 5.1	SA/SEA Topics, Sub Topics and SEA Objectives It is important that all potential impacts on the marine environment are considered,	Addressed in Section 3.3 of the ER.

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
			<p>not just those on water quality. The Baseline Data chapter makes reference to marine aspects under a number of sections. For example, Marine Protected Areas are referred to in the section dealing with Ecology and Nature Conservation; marine water quality is referred to in the section on Water; fisheries and aquaculture are referred to in the Natural Capital section; reference is made to marine renewable energy generation in the section on Material Assets and shipwrecks and other underwater features are mentioned in the Historic Environment.</p> <p>Given the recognition of many marine aspects within the Baseline Data chapter it is odd that these have not been given explicit recognition within the SEA/SA topics, sub-topics and SEA Objectives.</p> <p>Whilst, the quality of marine waters is recognised in the SEA Objective on Water, it is suggested that consideration is also given to drawing out the marine aspects within the other SEA Objectives.</p>	
43	3	Section 4.12	<p>Whilst, coastal areas are recognised within the landscape section of the Baseline Data, it is suggested that consideration could be given to including reference to seascape and specifically seascape character assessments within the landscape section.</p>	Addressed in Section 4.3 of the ER.
44	3		<p>Transboundary Considerations</p> <p>It is further advised that consideration should also be given to transboundary impacts of the marine environment, particularly given the cross-border loughs of Carlingford Lough and Lough Foyle.</p>	Addressed in Section 7.5 of the ER.
45	3	Section 3.3, 5.1	<p>Given the cross cutting nature of marine policy documents, potential marine impacts and the recognition of marine aspects within the baseline data, it would be helpful if the marine aspects of the SA/SEA topics, sub-topics were explicitly drawn out and reflected within the SEA Objectives.</p> <p>This will ensure your assessment is robust and transparent in relation to the consideration of potential impacts on the marine environment and importantly potential transboundary marine environmental effects.</p>	Addressed in Section 3.3 of the ER.
46	3	Section 4.7	<p>Marine Strategy and Licensing Team:</p> <p>There is a lack of inclusion of Shellfish Water Protected Areas and aquaculture sites in the SEA Scoping. These should be included under the Water heading.</p>	Addressed in Section 4.3 of the ER.
47	4		<p>Drinking Water Inspectorate Comments</p> <p>DWI has considered the SEA Scoping Report and would welcome the inclusion of water within the Theme: Supporting a Sustainable and Better Connected Future, in particular the: Support for actions related to development and protection of water</p>	Noted.

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
			catchments and water quality. Any improvement within the fresh water environment within Drinking Water Protected Areas will improve raw water being abstracted for drinking water therefore reducing treatment costs.	
48	4		Historic Environment Division Comments HED welcomes that cultural heritage has been scoped in and is to be carried forward to environmental assessment stage. We have made some observations in relation to the scoping report, some in relation to inaccuracies regarding historic environment data and interpretation, and also to some information gaps. We recommend that these comments be addressed to strengthen the assessment and make it more robust.	Noted.
49	4		As a general comment, HED highlights that historic environment related data is held by ourselves, based within the Department for Communities since 2016. Formerly we were based within NIEA, and prior to that EHS (the old Environment and Heritage Service has not existed since about 2008). We note that historic environment data is ascribed to these organisations in the report, but also that it is correctly referenced to ourselves in the appendices. We also specifically highlight the intertwined nature of the historic environment with the natural environment and landscape, which has implications with regard to the assessment and scoring of effects.	Addressed in Section 4.3 of the ER.
50	4	Section 3.1	Best Practice Guidance HED highlight that our own guidance document for SEA specifically in relation to the historic environment will be of benefit in the assessment process https://www.communities-ni.gov.uk/publications/guidance-sustainability-appraisal-and-strategic-environmental-assessment-historic-environment	Noted
51	4-5	Section 3.2	Sustainability Topics HED suggest the first sub topic relating to Historic Environment should be amended to read "Designated and non-designated sites, buildings and areas"	Addressed in Section 3.3 of the ER.
52	5	Section 3.4	Spatial and Temporal Scope HED highlight that given the intertwined nature of the historic environment with landscape and the natural environment, consideration of transboundary impacts is likely to be relevant with regard to this topic. The vast majority of heritage assets predate the border itself, some, such as canals and ancient earthworks traverse it, and the inter-relationships of sites, buildings and places and the potential effects	Transboundary effects are addressed in Section 7.5 of the ER, however no effects are anticipated on the historic environment.

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
			with regard to impacts on their setting and the understanding and the experience of them should be reflected upon.	
53	5	Section 4.11	<p>Historic Environment HED would strongly recommend laying out the context for the protection of Northern Historic Environment at the outset, reflecting concisely on the international/European conventions to which both Northern Ireland and Ireland are signed up to toward its protection (e.g. the Valletta Convention and the Granada Convention). Similarly for each jurisdiction HED suggest that it would be advisable to include brief concise reference to the legislative and policy protections which apply. (e.g. the Planning Act 2011, the Historic Monuments and Archaeological Objects (NI) Order 1995, the aims of Regional Development Strategy 2035 re the Historic Environment, and strategic objectives in the Strategic Planning Policy Statement 2015.</p>	The objective of the baseline data section is to describe the current state of the environment and through this identify any existing environmental problems.
54	5	Appendix C	HED advises that the key for the map illustrated in Appendix C is incorrect with regard to one of our datasets, that which relates to scheduled areas – these zones are not proposed for scheduling or descheduling, - this layer illustrates the scheduled areas for information purposes, which are designated for each individual scheduled monument – individual scheduling documentation can be consulted with regard to understanding the legal protection afforded to each individual zone.	Correction made in Appendix C of the ER.
55	5	Section 4.11	We welcome reference to the Giant’s Causeway World Heritage Site, designated on account of its natural heritage geological interest, but which very much illustrates the intertwined nature of natural and historic environments.	Noted
56	5	Section 4.11	There are several inaccuracies here with regard to misinterpretation of data and information. Scheduled monuments are managed by their owners under guidance from Department for Communities Historic Environment Division. The condition of scheduled monuments is actively monitored as an ongoing process, by HED. The CAMSAR report which is referenced in the paragraph was a study focused on a spatial area which examined the condition of all monuments on the Sites and Monuments Record in that zone, both scheduled and unscheduled. The study drew conclusions and made observations in relation to how designated and undesignated sites in the area were managed, as well as looking at sites managed under other types of scheme such as Countryside Management. The implications of scheduling may merit consideration for example with regard to the separate legislative context from planning which applies for consent to works affecting these sites.	Addressed in Section 4.3 of the ER.

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
57	6	Section 4.11	Listed Buildings are those designated for their 'special architectural or historic interest'. Unlike elsewhere in the UK, the Northern Ireland grading system for listed buildings is non-statutory. The same statutory controls apply equally to all listed buildings, irrespective of grade.	Addressed in Section 4.3 of the ER.
58	6	Section 4.11	Heritage assets which have been assessed against criteria and deemed to be 'At Risk' are recorded on the 'Heritage At Risk' Register for NI https://apps.communities-ni.gov.uk/Barni/ . This register is funded and managed by HED, DfC in partnership with Ulster Architectural Heritage (UAH).	Addressed in Section 4.3 of the ER.
59	6	Section 4.11	4.11.7 Councils in NI are currently in the process of developing Local Developments Plans for their district. HED therefore questions how the last line of the paragraph has been substantiated? Relevant to the topic, it may be appropriate to cite that, where engagement with owners of listed buildings 'At Risk' has failed to prompt action, Councils have powers to serve an Urgent Work Notice to arrest further damage to the building. https://www.communities-ni.gov.uk/publications/guidance-councils-urgent-worksnotices	The last sentence of paragraph 4.11.7 should have read as "In order to encourage building conservation activities, Local Development Plans should highlight that the re-use of 'buildings at risk' should be a priority for regeneration" based on a report by Ulster Architectural Heritage (2019).
60	6	Section 4.11	4.11.8 Reference to the CAMSAR study as per commentary above would be more appropriate in this section. As well as the Industrial Heritage Record HED advise that the Defence Heritage Record should be referenced as well as the inventory of shipwrecks.	Addressed in Section 4.3 of the ER.
61	6	Section 4.11	The policy weight afforded in planning terms to consideration of these assets should be worthy of reference. HED advise that the text makes no reference to designated Areas of Significant Archaeological Interest, (areas of distinctive historic landscape character which may contain undesignated and designated sites and monuments). We also advise that our Gazetteer of Historic Nucleated Urban Settlements merits reference in the report. This provides, alongside contextual prose, spatially defined areas illustrating the historic cores and early evolution of our settlements. It is a key tool in informing designations, and in place making, which would be particularly relevant toward public realm regenerative works.	Addressed in Section 4.3 of the ER.
62	6	Section 4.12 and 4.13	4.12.8 and 4.13.4 HED would highlight that Northern Ireland has some very specific historic landscape characteristics, which interweave with both the historic	Addressed in Section 4.3 of the ER.

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
			environment topic and the natural environment, for example our ancient administrative townland boundaries and historic parish boundaries.	
63	6-7	Section 4.14	Key Environmental Sustainability Issues and Likely Future Trends 4.14.3 Historic Environment and Landscape HED would highlight that economic regeneration has brought some pressure to the historic environment in Northern Ireland, and has in places resulted in impacts to historic character within our towns and cities, sometimes negative, through the removal of assets or impacts on their settings. Climate change is also a relevant issue with regard to our historic environment. We highlight the potential for heritage assets to impact positively on social and educational objects through their value in promotion of understanding of our past.	Addressed in Section 4.3 of the ER.
64	7	Table 5.1	Re Historic Environment Sub Objective. See previous comment re sub topics, objective a) might better read “preserve and enhance designated and non-designated sites, buildings and areas”.	Addressed in Section 3.3 of the ER.
65	7	Table 6.2	HED suggest that the potential for localized impacts on the historic environment ought to be better reflected upon with regard to likelihood of significant environmental effects.	Addressed in Section 7 of the ER.
66	7	Appendix B	Reflection on Plans/programmes with respect to the historic environment is extremely sparse, -refer to our previous comments around historic environment context. HED advises that for some council areas PPS6 will cease to have effect during the lifetime of the programme as Local Development Plan draft plan strategies become adopted. Reference to the relevant parts of the SPPS 2015 may be more appropriate here, as would reference to the relevant aims for built heritage in the RDS 2035.	Addressed in Appendix B of the ER.
67	7	Section 4.11	HED would welcome further reflection on the report following these comments. We highlight our digital datasets, which will aid in addressing some of the information gaps we have highlighted. https://www.communitiesni.gov.uk/publications/historic-environment-digital-datasets . We also advise that datasets in relation to the marine historic environment, including shipwrecks can be sourced by contacting rory.mcneary@daerani.gov.uk .	Addressed in Section 4.3 of the ER.
68	7	Section 4.11	In addition to the above we also highlight the value of considering potential impacts on understanding of transboundary post medieval vernacular heritage and historic settlement patterns, aspects of the historic environment which are very much	Transboundary effects are addressed in Section 7.5 of the ER, however no effects are anticipated on the historic environment.

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
			intertwined with landscape, and which can be indicated through historic ordnance survey maps.	
69	8		<p>Conclusion</p> <p>The scope of the assessment should clearly set out the potential impacts on the natural, marine/water and historical environments (including any transboundary effects) to be taken into account.</p>	Addressed in Section 7 of the ER.
Organisation and Contact: Department of Culture, Heritage and the Gaeltacht, Sport and Media				
Date received: 6/11/2020				
70	2		The Department recommends that the description and assessment of the baseline environment incorporates the SEA monitoring from the current programmes that it will replace. Where this information is not available the PPP (Task B6) should review current trends and should ensure that sufficient monitoring data is available at completion of the PPP to allow an assessment of impacts arising from the PPP on protected sites, species, biodiversity and the wider environment to be assessed.	The baseline assessment has been based on latest publicly available information. Proposed monitoring is addressed in Section 9.1.
71	2		The Department welcomes the inclusion of climate change in the thematic objectives and the acknowledgment that climate change cross cuts all thematic areas of the programme. The Department recommends that a similar focus is given to biodiversity loss. In May 2019 the Dail voted upon and declared both a National Climate and Biodiversity Emergency, making Ireland the first country in the world, after the UK, to do so. Biodiversity loss is as immediate and profound a threat as climate change and the SEA and PPP should reflect biodiversity loss as a core risk that underpins all plans and project cascading from the PEACEPLUS Programme.	<p>SEA Objectives updated to include sub-objective of no net loss of biodiversity (Table 3.2).</p> <p>SEUPB aims at contributing positively to the European Green Deal. These aspects are considered from a programme drafting perspective.</p>
72	2		Looking to the PPP, the SEA should identify measurable indicators for environmental and particularly Biodiversity impacts. A key driver of Biodiversity loss is habitat loss and the SEA process is particularly important for assessing the potential for cumulative impacts in relation to habitat loss that may arise from sub-threshold EIA projects. The SEA and PPP should establish effective and implementable monitoring of Biodiversity losses and gains, e.g. quantify and monitor the area of habitat loss and/or gains associated with the PPP, if any, across the lifetime of the PPP. Such quantifiable data can be obtained by requiring all development-type projects flowing from the programme to quantify the predicted habitat or biodiversity loss or gain associated with the project. All losses and or gains of important biodiversity features flowing from the PPP should be quantified	General processed regarding monitoring are described in Section 9 and more specific measures will immerge through programme implementation. It is noted that these need to focus on biodiversity and habitat loss and/or gains.

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
			over the lifetime of the plan and the SEA process should report on them at the end of the PPP.	
73	3		The Department notes that a large proportion of the PEACE target area is composed in coastal areas that also have the highest concentrations of urban development. The SEA should acknowledge the risk to coastal and marine habitats arising from cumulative impacts of development in the coastal zone. Moreover, the marine environment supports a variety of protected and endangered mobile species (e.g. Cetaceans, seals, seabirds, migratory wildfowl, sharks) that frequently move between the different jurisdictions covered by the PPP. The Department recommends that the SEA identifies marine projects flowing from the PPP as having elevated environmental risk and an increased need to be cognisant of effects that may occur at distance from the project location (i.e. marine impact pathways can be considerably longer than their terrestrial counterparts and both temporal and spatial in nature).	It is understood that there is limited capital works proposed in coastal and marine habitats with focus on survey, monitoring and research instead. The need for increased consideration of environmental risks in coastal and marine areas is acknowledged, this would be addressed through programme targeting of projects in these areas.
74	3		The Department would welcome an acknowledgement in the SEA of the complexities of cross-jurisdiction compliance with regard to environmental legislation, specifically within the marine environment and the area of operations of the Loughs Agency. Furthermore, the SEA should stipulate mitigation that ensures that projects flowing from the PPP in the marine environment fully comply with environmental legislation in whatever jurisdiction the projects will take place within. This can be effected by a requirement for project proponents to clearly understand and state the legal framework (statute and function) within which activities are proposed, including the consent authority and/or the relevant authority responsible for assessing and undertaking any Environmental Impact Assessment (EIA) and or Appropriate Assessment (AA) that may arise.	Addressed in Sections 7.5.31 and 9.1.7.
75	3		The Department recommends that SEUPB ensures that the scale and level of detail of maps and data in the SEA is relevant to the scale of impacts that have been predicted. Furthermore, mitigation measures should be fully integrated into the PPP itself and the final PPP should fully reflect the findings of SEA and AA because they are integrated processes that mutually complement each other.	Mitigation and enhancement measures documented in Section 8 and these are provided ahead of final programme drafting to be included at SEUPB discretion.
76	3 - 4		The SEA is process is designed to evaluate likely significant environmental consequences of a plan, in this manner SEA helps us to decide what we can do and where we can do it. To that end, the SEA process should identify and address the environmental issues that will be affected by the proposed PPP in a clear and	The Scoping Report has described the plan, the baseline environment and assessment methods.

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
			concise manner. Typically, a scoping report for SEA should describe the plan, baseline environment, level of decision making and assessment methods.	
77	4		SEA is a scientific based process where data and evidence should underpin statements, observations and conclusions in the report. Accordingly, baseline condition summaries should provide relevant references.	References have been included.
78	4	Section 4.3	Section 4.3.15 identifies pNHA sites as non-statutory nature protection areas with limited protection. The Department highlights that some protection for these sites is often effected through specific objectives in County Development Plans.	Addressed in Section 4.4 of the ER.
79	4	Section 4.3	Section 4.3.16 identifies statutory nature reserves in Ireland. The Department highlights that statutory Wildfowl Reserves also provide protection for migratory and resident wildfowl species and the habitats that support them.	Addressed in Section 4.4 of the ER.
80	4	Section 4.3	Section 4.3.21 Red List assessments should include marine species assessments e.g. elasmobranch species assessments https://www.npws.ie/sites/default/files/publications/pdf/Red%20List%2011%20Shar%20et%20al.pdf	Addressed in Section 4.4 of the ER.
81	4	Section 2.4	Section 2.4.4 provides for a renewed focus on rural and border communities in particular through initiatives which renew infrastructure for community use and benefit that will enhance the social fabric of communities. The Department recommends that the PPP contains a dedicated objective to ensure that downstream projects comply with EU and national environmental assessment requirements and legislation, specifically AA and EIA, where required.	Addressed in Sections 7.5.31 and 9.1.7. SEUPB considered it in programme drafting
82	4		The Department welcomes the inclusion of Ecology and Nature conservation as a sustainability topic. However, the SEA should flag the risk to nature conservation interests that can arise from the provision of Green Infrastructure (GI) (e.g. a greenway along a river bank or shore line). While the Department welcomes GI initiatives and recognises the many benefits from this approach, care needs to be taken in planning for GI that threatened, endangered and rare flora and fauna or habitats are not negatively affected by proposals. Sustainable GI initiatives and proposals must provide for positive outcomes for biodiversity in all cases.	Addressed in Section 7 of the ER.
83	4	Table 5.1	The Department recommends the inclusion of a Sub Objective for Objective 1: Ecology and Nature conservation: To ensure no net loss of biodiversity associated with any project flowing from the programme.	Addressed in Section 3.3
84	4	Table 5.1	The Department recommends that Objective 11 is worded in a manner that acknowledges the need to sustainably encourage multi- functionality of greenspace.	Addressed in Section 3.3

Comment ref.	Page of letter	Scoping Report ref.	Comment	Actions carried out to address comment
85	5		<p>The Environmental Protection Agency (EPA) SEA guidance and resources¹ and their GIS based assessment tools² are valuable assets that should be used to inform the SEA process for the PPP. 1 http://www.epa.ie/monitoringassessment/assessment/sea/resources/; 2 https://gis.epa.ie/EPAMaps/SEA</p>	<p>EPA guidance has been used and EPA resources used in gathering baseline data.</p>
<p>Organisation and contact: Department of Agriculture, Food and the Marine</p>				
<p>Date received: 9/11/2020</p>				
			<p>No submissions or observations at this time.</p>	

APPENDIX B: STATUTORY AND PUBLIC CONSULTATION RESPONSES

Statutory Consultee Comments

Comment ref.	Page of letter	ER Report ref.	Comment	Actions carried out to address comment
Organisation: Environment Protection Agency (EPA)				
Date received: 12/04/2021				
1	1		We acknowledge that the Programme supports the sustainable development of the Programme area. In seeking to improve educational and social aspects associated with the Programme, we also acknowledge that Theme 5: Supporting a Sustainable and Better-Connected Future promotes and supports education and social awareness of environmental resources within the Programme area as well as funding different environmental protection and sustainability initiatives. We also note and welcome the proposed investment areas under this theme: i) Biodiversity, Nature Recovery and Resilience; ii) Marine and Coastal Management, iii) Water Quality and Catchment Management, iv) Water Quality Improvement Programme, v) Geothermal Energy Demonstration Programme and vi) Enhanced Sustainable Travel Connectivity. These areas, if implemented correctly and supported by the appropriate monitoring and reporting should help provide for environmentally sustainable development and protection of our natural resources.	Noted
2	2		<p>Specific Comments on the Programme</p> <p>From a transboundary perspective, the Programme should consider and promote compliance with the requirements of the relevant environmental European directives (Water Framework, Floods Directive, Marine Spatial Planning Framework, Waste Framework, Air Quality, Habitats, Birds, Floods, SEA, EIA, etc). Potential transboundary effects arising from any proposed climate adaptation or climate mitigation measures should also be considered, as appropriate.</p>	<p>Project assessment stage and decision making on project support (Steering committee) can be used to cover this.</p> <p>Furthermore, there is a requirement for EIA as part of the application process.</p> <p>In addition to this, it is required that the programme and supported projects</p>

Comment ref.	Page of letter	ER Report ref.	Comment	Actions carried out to address comment
				<p>respect the horizontal principles, including: The objectives of the Funds shall be pursued in line with the objective of promoting sustainable development as set out in Article 11 TFEU, taking into account the UN Sustainable Development Goals, the Paris Climate Agreement and the "do no significant harm" principle. The objectives of the Funds shall be pursued in full respect of the EU environmental acquis.</p> <p>This is also assessed during project application stage.</p> <p>Finally, the Steering Committee and the Managing Authorities can set conditions for project to complete to be approved. These conditions will either need to be completed before the signature of the grant offer letter or they will be included as part of a clause in the grant offer letter, which has contractual nature.</p>

Comment ref.	Page of letter	ER Report ref.	Comment	Actions carried out to address comment
				This is taken into account the Monitoring Measures section of the SEA statement.
3	2		We welcome that the Programme refers to the European Green Deal and the UN Sustainability Development Goals as key documents within the context of the Programme.	Noted
4	2		The Programme should include a commitment to improve awareness of the value and benefits/opportunities of existing environmental resources, including where relevant associated ecosystem services. This may provide a means of nurturing a community-based approach to protection, valuing and sharing the environmental resources within the Programme area.	All projects are required to disseminate and capitalise in their projects. In addition in most Investment Areas there are actions for awareness raising. These are included in Theme 5.
5	2		The Programme would also benefit from including a commitment that any plans or projects arising out of implementation of the Programme, should take into account the requirements of the SEA, Habitats and EIA directives in particular, as relevant and where appropriate.	During the application process each project will need to demonstrate how, and to what extent, the project will contribute towards those strategic aims, targets and objectives set out in key policies/ strategies that are considered to be directly relevant to the project.
6	2		Additionally, projects funded under this Programme should be consistent with relevant recommendations in higher level plans in the planning hierarchy (for example biodiversity, water management, transportation, climate change, etc.).	See response to comments 2 and 5.
7	2		We also recommend that a commitment is included to link the SEA and Programme related monitoring and reporting aspects. This would allow the potential for likely significant effects, including cumulative effects, to be identified during Programme implementation and appropriate remedial action to be undertaken where necessary.	Noted

Comment ref.	Page of letter	ER Report ref.	Comment	Actions carried out to address comment
8	2	Table 6.1 and 6.2 (Table 7.1 and 7.2 in Final Report)	<p>Specific Comments on the SEA Environmental Report</p> <p>Chapter 6 – Assessment of Impacts</p> <p>We note the assessment of the specific objectives of the Programme against the SEA Objectives as outlined in Table 6.1 – High Level Matrix Assessment of Selected Strategic Alternative and Table 6.2 Detailed Matrix Assessment. Where Investment Priorities are predicted to have uncertain or adverse effects at the high-level assessment stage, the Programme should ensure the inclusion of appropriate mitigation measures.</p>	Additional mitigation added to Section 8.2.
9	3	Section 6.5 (Section 7.5 in Final Report)	The inclusion of Section 6.5 – Cumulative Effects Assessment is noted. The assessment of the specific objectives and policies of relevance against the aims of the Programme is also noted. We welcome that the EPA's guidance on cumulative effects assessment in SEA (EPA, 2020) has been taken into account.	Noted
10	3	Appendix B	<p>In addition to the programmes to consider, referred to in our SEA scoping submission, issued on the 30th October 2020, the following additional programmes should also be considered, as relevant and appropriate:</p> <ul style="list-style-type: none"> - CAP Strategic Plan 2023-2027 - Draft Flood Risk Management Plan for Northern Ireland - Interim Climate Actions 2021 - Waste Action Plan for a Circular Economy - EU Climate Adaptation Strategy 2021 	Additional plan & programmes reviewed and added as Appendix B2 to the ER.
11	3	Chapter 7	<p>Chapter 7 Mitigation and Recommendations</p> <p>We acknowledge the suggested mitigation measures to help minimise adverse effects (including general measures and ecosystem service aspects) and recognising the need to consider biodiversity and ecosystem service enhancements, where possible. A clear objective should be included that requires projects funded under the Programme to be consistent with relevant recommendations in higher level plans in the planning hierarchy (for example land use, biodiversity, water management, transportation, climate change, etc.).</p>	See response to comments 2 and 5
12	3	Chapter 8	<p>Chapter 8 - Monitoring</p> <p>The SEA should provide more specific information in terms of the proposed monitoring programme. Where potential adverse effects have been identified, there is merit in including details of monitoring frequency and bodies responsible for carrying out the monitoring of the relevant environmental criteria, where possible.</p>	Full monitoring proposals to be included in the SEA Statement.
13	3	Chapter 8	There may be merit in providing information on the previous monitoring programme to help inform the monitoring programme for this iteration of the Programme. Additionally, the findings of the	Noted but available level of data from previous

Comment ref.	Page of letter	ER Report ref.	Comment	Actions carried out to address comment
			previous monitoring could help identify how the new monitoring programme can be improved for particular environmental criteria.	programme does not permit this level of analysis.
14	3	Chapter 8	We also suggest linking both Programme and SEA related monitoring aspects. There is also merit in linking Programme-related monitoring with environmental performance related monitoring and reporting.	See response to comment 12
15	3	Chapter 8	Guidance on SEA-related monitoring is available on the EPA website at https://www.epa.ie/pubs/advice/ea/guidanceonseastatementsandmonitoring.html	Guidance has been used.
16	4		Ireland's Environment: An Integrated Assessment 2020 In finalising the Programme and integrating the findings of the SEA into the Programme, the recommendations, key issues and challenges described in our State of the Environment Report Ireland's Environment – An Integrated Assessment 2020 (EPA, 2020) should be considered, as relevant.	Relevance to the baseline section considered particularly with reference to the key issues and challenge as referred. Addressed in Section 4.5.
17	4		Delivering Ireland's long-term sustainable development and environmental protection goals will require a concerted effort by many stakeholders to address these key actions. These actions are: 1. National Policy Position for Ireland's Environment - Recognition of the need for an integrated policy position given the many interlinkages and dependencies. 2. Full Implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies 3. Promote the benefits of a clean environment for health and wellbeing 4. Systemic change is needed for Ireland to become climate neutral and a climate resilient society and economy. 5. WHO clean air quality guideline values to be adopted within the Clear Air Strategy as specific targets to achieve. 6. Safeguard nature and wild places as a national priority to preserve its legacy for future generations 7. Improve the water environment and tackle water pollution water quality locally at a water catchment level. 8. Reduce human induced pressures on the marine environment 9. Move away rapidly from extensive use of fossil fuels to the use of clean energy systems 10. An agriculture and food sector that demonstrates validated performance around producing food with a low environmental footprint. 11. Drinking water and wastewater infrastructure must meet the needs of our society 12. Move to a less wasteful and circular economy where the priority is waste prevention, reuse,	Noted

Comment ref.	Page of letter	ER Report ref.	Comment	Actions carried out to address comment
			repair and recycle. 13. Promote integrated land mapping approaches to support decision making on sustainable land use.	
18	4		Future Amendments to the Programme You should screen any future amendments to the Programme for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Programme.	Noted to add in Management Control Systems for section on programme amendments.
19	4		SEA Statement – “Information on the Decision” Once the Programme is adopted, you should prepare an SEA Statement that summarises: <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Programme; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Programme; • The reasons for choosing the Programme adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the Programme. 	To be taken into account in preparation of the SEA Statement.
20	5		You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.	To be carried out on completion of the SEA Statement.
21	5		Guidance on preparing SEA Statements is available on the EPA website at the following link: https://www.epa.ie/pubs/advice/ea/guidanceonseastatementsandmonitoring.html	To be taken into account in preparation of SEA statement.
Organisation: Department of the Environment, Climate and Communications - Geological Survey Ireland				
Date received: 30/04/2021				
22	1		Please see our website for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to ‘Geological Survey Ireland’.	Noted
23	1	Section 3.3	We are pleased to see that geological heritage has been included as a sub-objective in Section 3.3 of the SEA report and note that SEUPB is not a Local Authority and development and planning is not within their remit.	Noted
24	1	Section 4.4	We are pleased to see reference to the cross-border Marble Arch Caves Global Geopark in Section 4.3 of the SEA report. We also note the mention of our Geohazards, Minerals/Aggregates, Marine and Coastal Unit and Tellus datasets within the SEA Report.	Noted

Comment ref.	Page of letter	ER Report ref.	Comment	Actions carried out to address comment
Organisation: Department of Environment, Climate and Communications - Inland Fisheries Ireland				
Date received: 12/05/21				
25	1		We note Theme 5 is of most significance in relation to inland fisheries. We also note that IFI comments submitted in October 2020 appear to have been taken on board. From a fisheries perspective we have no further comments at this time.	Noted
Organisation: Department of Agriculture, Environment and Rural Affairs - Northern Ireland Environment Agency				
Date received: 12/05/2021				
26	1		The layout and content of the Environmental Report is well laid out and easy to follow. DAERA SEA Team is content that the environmental report and the process of consultation follow the SEA Directive.	Noted
27	1		The PEACEPLUS Programme 2021-2027 and accompanying Environmental Report have been made available to designated authorities, transboundary bodies and the public. DAERA is happy previous consultations, including the SEA scoping, are documented in the appendixes and the actions relating to each of the comments detailed. A description of the current state of the environment and how this relates to the proposed PEACEPLUS Programme is included within the environmental report. Appropriate environmental objectives / targets / indicators for each of the likely environmental receptors is addressed including consideration of alternatives, an assessment of significant impact and complemented with mitigation measures and monitoring programme.	Noted
28	2	Chapter 6 (Chapter 7 in Final Report)	<p>Natural Environment Division (NED) Comments</p> <p>Chapter 6 Assessment of Impacts NED note the specific locations for impacts from the PEACEPLUS Programme 2021-2027 are unknown at this stage. However across all Themes, with the exception of Theme 5 "Supporting a Sustainable and Better Connected Future", the assessment matrix has scored the Ecology and Nature Conservation SEA objective as Neutral/No effect. Although NED do not necessarily object to this rating/scoring approach, it is thought at +/- Uncertain effect may be more appropriate, due to the unknown nature of the investment areas likely funding. E.g. Theme 1 IA4 Re-imaging Communities, actions to be supported by the PEACEPLUS include "the development of re-imaged and new facilities". While we note that this is likely to be in urban area and involve regeneration this along with new facilities have the possibility of having environmental impacts e.g. located within/in proximity to designated sites or priority habitat. With this in mind NED believe some of the investment areas impact rating could be reassigned to +/- uncertain effect. Any funding that may involve additional infrastructure including bringing/enhancing technologies into rural areas may also need re-consideration. Full assessment relating to the types of impacts will have to be undertaken when specific project details and locations are known.</p>	The assessment is necessarily limited by the level of project information available at this stage. The potential for significant adverse effects is expected to be limited in most cases by the nature of the activities funded and the expected locations. However the concerns raised are noted and it is proposed to include an additional mitigation level to require project level

Comment ref.	Page of letter	ER Report ref.	Comment	Actions carried out to address comment
				environmental appraisal by SEUPB prior to funding decision. Addressed in Section 8.2.
29	2	Section 6.4 (Section 7.4 in Final Report)	NED is in agreement with Theme 4 Healthy and Inclusive Communities and Theme 5 Supporting a Sustainable and Better Connected Future being carried forward to the detailed assessment stage with the potential outcome of minor / negligible adverse effect predicted on ecology / natural heritage.	Noted
30	2	Section 6.5 (Section 7.5 in Final Report)	We would like to draw your attention to a minor typo in section 6.5.4, "PEACEPLUS Programme is not anticipated to cause significant adverse effects on Nature 2000 sites", Nature 2000 should be corrected to read Natura 2000.	Corrected in final ER.
31	2&3		<p>Marine Plan Team Comments:</p> <p>It is noted that references to the Marine Strategy Framework Directive and the Maritime Spatial Planning Directive have now been included within Annex B. It is also observed the list of plans, programmes and environmental protection measures in Annex B are no longer categorised under SEA topic areas. Although the marine aspect is not explicitly included in all of the relevant SEA Objectives, it is observed that a number of the SEA Sub-Objectives are more inclusive in this regard. The inclusion of seascape and seascape character areas within the Summary of Baseline Data, and the inclusion of the 2014 Northern Ireland Regional Seascape Character Assessment within the list of references is noted. Recognition of the beneficial effects on water and ecology and nature conservation in the marine area under Transboundary Effects is noted. In addition, the need for the programme to comply with cross-jurisdictional environmental legislation, which extends into the marine environment, is welcomed.</p>	Noted
32	3		<p>Inland Fisheries Comments:</p> <p>Inland Fisheries is generally content with the overall document as provided.</p>	Noted
33	3	Section 4.4	In Section 4 the Material Assets - Strengths and Opportunities - Northern Ireland - it has been stated that: 'Northern Ireland has significant natural resources such as water, carbon rich soils and high quality grassland, whilst natural resources are also available for renewable energy generation e.g. wind, hydro, marine, biomass and solar.' It should be noted that this, in relation to	Noted

Comment ref.	Page of letter	ER Report ref.	Comment	Actions carried out to address comment
			<p>renewable energy generation - Hydro-generated power could also be seen as a weakness. There is great risk associated with Hydro development and should be treated with extreme caution, as the potential impacts are high in relation to migratory fish species and with particular attention to transboundary impacts. For this reason, Inland Fisheries welcomes the statements below.</p> <p>2.8.2 IA1: Biodiversity, Nature Recovery and Resilience presents an opportunity to build upon current INTERREG VA Programme by continuing to promote cross border cooperation and facilitating the recovery of additional protected habitats and priority species. Investment will be directed towards further delivery of conservation actions proven to redress biodiversity loss and preserve these important environmental, social and economic assets.</p> <p>2.8.7 IA4: Water Quality Improvement Programme will result in an improvement in the water quality of three specific transitional water bodies: Lough Erne, Lough Melvin and Donegal Bay through cross border collaboration. In addition, raw drinking water quality will be improved through the reduction of pollutants, including those of an agricultural nature.</p> <p>2.8.8 Actions specified under IA4 include: - The production of enhanced fishery assessments for both Lough Erne and Lough Melvin; - Upstream catchment based initiatives to encourage uptake of catchment measures that achieve multiple benefits for water quality, quantity and biodiversity: As a statutory consultee, Inland Fisheries will continue to consult on any planning applications made by participants in the programme that may have potential transboundary impacts. Inland Fisheries welcomes the SEA's particular reference to these systems and given their transboundary nature the potential for co-operation concerning any proposed development within these catchments. The programme also has the potential to identify mutually beneficially programmes of research and/or conservation. Inland Fisheries welcomes the approach adopted in the SEA documents provided and sees great opportunities therein.</p>	
34	4	Appendix A	<p>Department for Communities Historic Environment Division Comments: HED welcome the demonstration of consideration of the comments provided at scoping stage as demonstrated in the table in Appendix A.</p>	Noted
35	4	Section 4.4	In relation to bullet point 2, page 38 Weaknesses and Threats we advise the following reference is useful in relation to this issue. •Harkin, R. 2015 Anything goes: architectural destruction in Northern Ireland after 'the Troubles'. In J.M. Mancini and K. Bresnahan (eds) Architecture and Armed Conflict, 147-163. London: Routledge.	Noted
36	4	Section 4.4	For the purpose of clarity, we advise that the example of historic landscape characteristics cited in our previous response (dated 26/10/2020) - that which is in relation to townlands and parish boundaries -is a characteristic, which exists throughout the island.	Added to Section 4.3.
37	5	Chapter 6 (Chapter	HED note and agree that there is limited direct interaction between the programme and cultural heritage, and that at this stage specific locations for interventions are unknown. We therefore	Noted

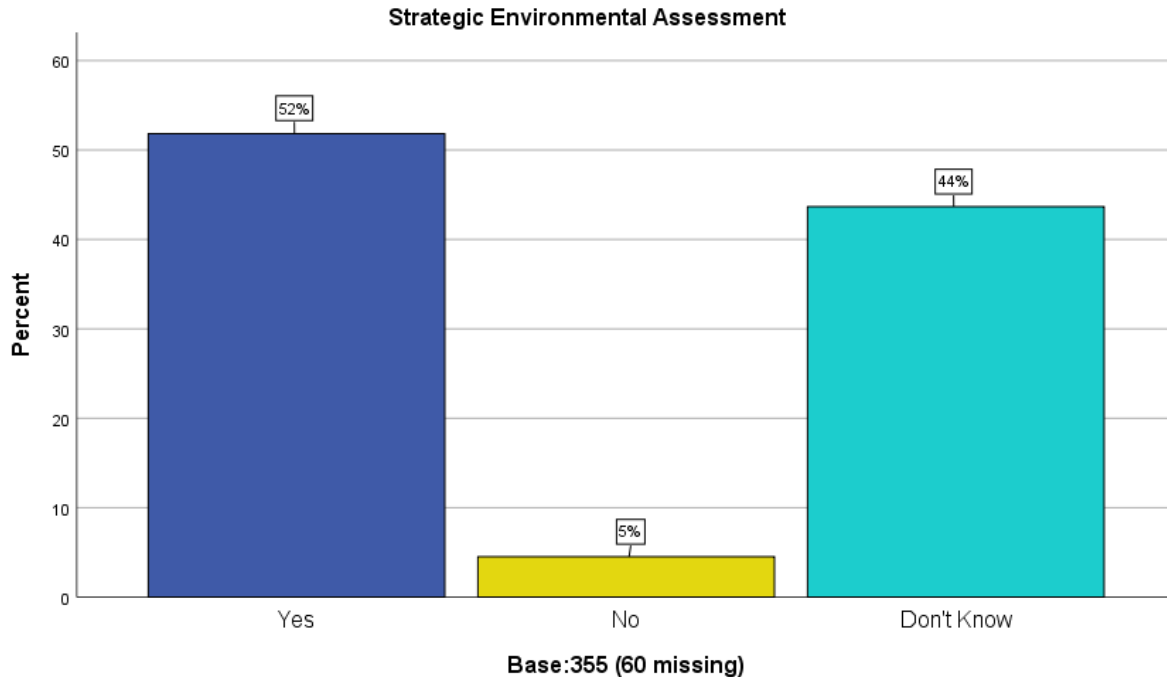
Comment ref.	Page of letter	ER Report ref.	Comment	Actions carried out to address comment
		7 in Final Report)	broadly concur with the scoring approach around potential impacts on the historic environment in the assessment matrices. We highlight the intertwined nature of the historic environment with the natural environment and landscape, when the potential for effects can be comparable, e.g. when there is potential for impact on previously unidentified remains through new construction or when greenway infrastructure makes use of a heritage asset such as a canal or abandoned railway. We are mindful that assessment in relation to these types of impacts can be implemented when specific locations are known.	
38	5		Natural Environment Division (NED) Comments NED agrees with the Habitat Regulation Assessment Screening that the PEACEPLUS Programme is not anticipated to cause significant adverse effects on Natura 2000 sites. However, as specific locations for impacts from the PEACEPLUS Programme 2021-2027 are unknown at this stage, full assessment relating to the types of impacts will have to be undertaken once specific project details and locations are known.	Noted, see additional mitigation measurements now proposed in response to comment 28. These will also consider effects on designated sites.
39	5		Marine Conservation and Reporting Overall, content with the conclusions of the HRA though some specific comments on the HRA screening report are included below: Table 4.3 Overall status of Annex II, IV and V Species in NI has not included Harbour porpoise, Harbour seal or Grey seal.	Noted but not anticipated to change conclusions of the screening exercise.
40	5		Figure 4.1a Natura 2000 Sites has not included the East Coast Marine proposed SPA or Carlingford Lough proposed SPA marine extension.	Noted but not anticipated to change conclusions of the screening exercise.
41	5		Under Theme 5 (Section 5.2.8), it is concluded that each, the investment areas will either have a negligible or positive effect on the Natura 2000 sites and on this basis the PEACEPLUS programme should screen out of further consideration through the HRA process. It is recommended that once the investment areas are fully defined in terms of proposal and relevant designated site the screening should be repeated to determine if any potential effects are likely from the individual plans/projects.	See response to comment 38.
42	6		DAERA is content with the contents of the Environmental report and Habitat Regulation Assessment Screening Report.	Noted
Organisation: Department of Agriculture, Food and the Marine				
Date received: 12/05/2021				
43	1		Commercial sea fishing is a long standing, pre-existing and traditional activity in the marine environment. The evaluation and consideration of potential impacts and supports for any commercial sea fishing activities needs to be given consideration as part of any	Noted but Programme is not anticipated to have any negative effects for

Comment ref.	Page of letter	ER Report ref.	Comment	Actions carried out to address comment
			<p>planning/proposal process and during the development process itself. It is imperative that engagement should be sought with the fishing industry and other relevant stakeholders at as early a stage as possible, and at every stage of any planning/proposal process and during the process itself, to discuss any changes that may affect them to afford a chance for their input. Commercial sea fishing is a traditional livelihood in the border coastal counties. It is important to support this livelihood. Fishers' interests and livelihoods must be fully recognised and taken into account.</p>	<p>fisheries or fishing communities. Fisheries are not supported through PEACEPLUS, this is outside the scope of the programme.</p>
44	1		<p>One aspect that does not appear to be very well highlighted is any measure to address the fact that post Brexit we now have two separate policy frameworks governing the management and protection of marine resources and biodiversity around the island of Ireland, and this could pose difficulties particularly in the transboundary areas. On the EU/ROI side we have the Common Fisheries Policy, the Marine Strategy Framework Directive, Marine Spatial Planning Directive, the Water Framework Directive and birds and habitats directives, and on the UK/NI side we have the transposition/equivalent of those in UK law. It would appear that there should be some consideration in the PEACEPLUS programme to facilitate collaboration across agencies in both jurisdictions working with the implementation of these policies. As it stands the programme refers to transboundary action plans for various types of surveys and some work on the circular economy and marine litter. The activity on biodiversity Marine Protected Area's and climate action plans are restricted to local activities. If there is scope for future deviation of marine policy for NI and ROI waters, then there should be an aspect of the PEACEPLUS programme which facilitates interagency collaboration across the island of Ireland to work towards a harmonious implementation of common goals; this would benefit the citizens of both jurisdictions and potentially afford more effective protection of the marine environment.</p>	<p>The Investment Area 6.1. Building and Embedding Partnership and Collaboration will focus on strategic planning and engagement in cross border basis. The focus of this is to find solutions to barriers to transboundary actions. This can include changes due to Brexit to Environmental policy framework and governance. This will depend on the projects applying for funding.</p> <p>Theme 5 will also contribute cross border strategies and action plans, in this case directly linked to Environment.</p>

Comment ref.	Page of letter	ER Report ref.	Comment	Actions carried out to address comment
Organisation: Development Applications Unit (DAU) Department of Housing, Local Government and Heritage / National Parks and Wildlife Service				
Date received: 12/05/2021				
45	1		These observations are intended to assist you in assessing the impacts that may arise in relation to European sites, other nature conservation sites, biodiversity and environmental protection in general in the context of undertaking environmental assessment of the PEACEPLUS programme (PPP). Their aim is to support and encourage SEUPB to integrate compliance with environmental legislation, environmental risk mitigation and biodiversity awareness into the PPP. National Parks and Wildlife Service (NPWS) staff are available to discuss these observations and other nature conservation issues arising from the preparation of the PPP.	Noted
46	1		The Department welcomes the detailed consideration of biodiversity and related matters in the SEA Environmental Report. The Department welcomes the inclusion of mitigation.	Noted
47	2		The Department notes the outcome of the Habitats Regulations Screening Report and the conclusions reached. The Department also notes the requirement for screening for appropriate assessment in relation to all downstream plans and projects arising from the PPP and encourages the PPP to put in place mechanisms to ensure that this consideration is integrated into plans and projects which arise from the implementation of the PPP.	Agree that downstream plans will need screening for HRA. Projects will be subject to an additional level of environmental appraisal as response to comment 28.

Public Consultation Responses

Q.19 Do the findings from the Strategic Environmental Assessment (SEA) for the PEACEPLUS Programme cover all the relevant information?



Over half (52%) of the respondents (184) agreed that the findings from the Strategic Environmental Assessment for the PEACEPLUS Programme covered all the relevant information. Approximately 44% did not know (155 respondents) and 5% (16 respondents) did not agree that the SEA covered all the relevant information. (N.B. Differences to 100% are due to rounding.)

Q.20 If no, what else do we need to consider and why?

Yes

- Important that CICs are considered for funding in PEACEPLUS
- NI contains significant proportions of UK's remaining blanket bog, many of which are cross-border. Ireland has a higher proportion of this in border counties and can offer much shared experience. This report highlights the paucity of knowledge in relation to the peatlands of NI. Conversely, NI contains a higher number of Ramsar wetlands in border regions, providing the potential for invaluable knowledge exchange and promotion in the opposite direction. As highlighted in the SWOT analysis, these shared peatland catchments also offer significant natural capital value, in terms of carbon storage and sequestration potential, biodiversity, water quality, amenity and cultural value. Positives from this include: Promotion of environment related volunteering activities in cross-community and cross-border engagement programmes; Support for environment, sustainability and climate themed education programmes; Improving the condition of designated sites; and the greening of shared spaces.
- The preparation of this submission has involved in a number of conversations with cross-border partners who will also submit their own views on the potential for collaboration.

- Fully support the approach in line with European Directive 2001/42/EC12
- Happy that Alternative 5 can deliver once complimented by existing and emerging resource and funding opportunities. No application should be excluded if investment/funding secured in that area - consider synergy and complimentarity and catalyst for change and growth.
- X is confident that SEUPB have completed due diligence on the Environmental considerations in line with Northern Ireland and Ireland's legislative requirements.
- Community Leadership training is essential to support people to take collective actions. Actions for change through Community Organising - including communication, working with others, influencing and driving change.
- Include Rural Communities

No

- Recommend following amends to sub-objs to better identify those IA for which uncertainties or potential adverse effects may arise. 1.g at a time of a nature emergency should be achieving biodiversity net gain. 2.d should include reference to the natural environment. 3.d should reference Green Recovery. 4.a not always the highest quality soil & land needs safeguarding for benefit of biodiversity e.g species rich grassland-this needs wider consideration. 7.b renewables in harmony with nature required-nature & climate emergency. 8.a should be within environmental limits & include need to reduce. 8.b should include reference to move away from fossil fuel use. 8.c should include reference to sustainable. 11-generally-stronger wording than 'encourage' in face of nature & climate emergency. Elsewhere in doc. examining cumulative effects, wider project/prog range required HRA should be available for review.
- The assessment provides good coverage of the relevant information. The strengths/opportunities in most areas can be expanded, but that will be the aim of the PEACEPLUS programme. An obvious shortcoming is the focus on the terrestrial environment in the "current status of the environment" with little mention of the marine environment given the geographical island status and significant impact this has on the climate and future sustainability. It is an important component of natural capital, societal well-being and underpins the economic prosperity. This and the importance in terms of resilience and finding solutions to environmental challenges should be recognised & addressed. The economy of the region is very agriculture driven and the challenges in terms of environmental sustainability is not adequately included. This should be of course seen in the context of the importance of this sector and the need for a comprehensive effort to achieve environmental & economic sustainability.
- The X supports the submission of member organisation the Bird Watch Ireland (BWI), which welcomes the inclusion of SEA Objective11 Natural Capital (Table 3.2) but is concerned around the limiting effects of some sub-objectives. BWI recommends amending some of the sub-objectives to better identify those IAs for which uncertainties or potential adverse effects may arise. Recommendations are as follows: 1.g Given the current nature and climate emergency, the programme should aim to achieve biodiversity net gain rather than avoid net loss. 2.d should include reference to the natural environment and 'access to' as well as promotion of recognition. 3 should include a specific objective of supporting a Green Recovery. 4.a should not confine itself to the highest quality land and soil, soil and land that are not the 'highest quality' also need safeguarding and improving.
- The importance of geothermal is widely underestimated by the report. Switching from fossil fuels to sustainable geothermal heat will avoid the release of CO2 to the air and prevent climate change. This is critical to maintain habitats and conserve the environment. The report must change to reflect this. Geothermal is a game changer, it is the only renewable energy resource that is available 24/7 and is scalable to local demands/needs. The basins across Ulster have some of the highest geothermal gradients in the British Isles, we should and must exploit this.
- The report is comprehensive and well written. The report correctly highlights in the Climate Change section an over reliance on the private car in Northern Ireland. Whilst alternative technologies will assist with decarbonising and reducing harmful emissions from transport, a greater focus on transport efficiency and modal shift to sustainable public transport is required. The use of public transport instead of the private car immediately reduces the carbon footprint of a journey by at least 50% and more if low or zero emission buses/trains are utilised. Translink would highlight that an efficient, frequent, sustainable and

accessible public transport system such as an improved Cross Border Rail Service will reduce private car usage/ownership and therefore can significantly reduce greenhouse gas emissions. The PEACEPLUS Programme and theme 5.6 in particular provide a real opportunity to support modal shift from the private car onto sustainable PT.

- We welcome the inclusion of SEA Obj.11 Natural Capital but have concerns around some sub-objectives. We recommend the following amendments: 1g. At a time of a nature & climate emergency should be achieving biodiversity net gain 2d. Should include reference to the natural environment & 'access to' as well as promotion of recognition 3d. Should reference Green Recovery 4a. Not always the highest quality soil & land needs safeguarding for benefit of biodiversity e.g species rich grassland-this needs wider consideration 7b. Renewables in harmony with nature required nature & climate emergency 8a. Should be within environmental limits & include need to reduce 8b. Should include reference to move away from fossil fuel use 8c. Should include reference to sustainable 11. Stronger wording than 'encourage' is required. The programme should take account of all Planning Policy Statements and new LDPs currently in preparation by councils. HRA should be available for review
- We would suggest that the following points are clearly added to the EIA reflecting developments that should be included in the Environmental Improvement Plan later this year to be monitored by the Office of Environmental Protection. For inclusion - net environment gain for all developments, net zero emissions, stronger recognition of cumulative impacts for proposed developments.
- Where is the security assessment and strategy
- Whilst drinking water compliance is high, there are issues with the raw water in drinking water catchments (not currently in the SEA) that impact energy and treatment costs as well as issues that impact WFD compliance. Pesticides and other parameters have led to water quality exceedances causing regulatory enforcements. (NI Water Drinking Water Quality Annual Report 2019, Approaches to herbicide (MCPA) pollution mitigation in drinking water source catchments using enhanced space and time monitoring - ScienceDirect). These issues are due to poor land management practices. The SEA should consider improvements required in many drinking water catchments in addition to Erne/Melvin/Donnegal Bay, and represent all Water Quality issues, enabling drinking water quality projects to also be progressed.

Don't know

- X has no specific expertise in this area and therefore will not comment in any further detail. However, X welcomes reference to the SDGs and believes that the SDGs should form the framework informing the Programme. The SDGs are agreed as a global compact, and are binding on both the UK and Ireland, as State Parties to the Paris Agreement. They are also focused on promoting wellbeing for all and supported by a validated indicator set that can underpin all monitoring in a way that assists Northern Ireland in the global economy. They also support interlinkage between issues, which is critical to ensure value for money and the best outcomes. X also welcomes the alignment with the European Green Deal. The climate emergency is global and requires collaborative international action.
- Need to ensure balance with economic needs on the ground.

Organisations who agree the SEA does include/does not include the relevant information

Number/percentage of organisations who believe the findings do/do not/don't know if the SEA includes all the relevant information by how they describe their organisation. Please note 37.5% of environmental organisations who responded to the survey do not feel it includes all the relevant information. Total of 14 environmental organisations.

Description of respondent * SEA Crosstabulation

Description of respondent		SEA			Total
		Yes	No	Don't Know	
N/A	Count	14	2	18	34
	% within SEA	7.9%	12.5%	12.2%	10.0%
Business Organisation	Count	11	0	4	15
	% within SEA	6.2%	0.0%	2.7%	4.4%
Community/Voluntary Organisation	Count	63	2	64	129
	% within SEA	35.6%	12.5%	43.2%	37.8%
Social Enterprise	Count	4	0	9	13
	% within SEA	2.3%	0.0%	6.1%	3.8%
Cross Border Group	Count	3	0	2	5
	% within SEA	1.7%	0.0%	1.4%	1.5%
Education	Count	10	1	4	15
	% within SEA	5.6%	6.3%	2.7%	4.4%
Environmental Organisation	Count	4	6	4	14
	% within SEA	2.3%	37.5%	2.7%	4.1%
Government Agency	Count	7	1	3	11
	% within SEA	4.0%	6.3%	2.0%	3.2%
Government Department	Count	1	0	2	3
	% within SEA	0.6%	0.0%	1.4%	0.9%
Higher Education	Count	12	1	6	19
	% within SEA	6.8%	6.3%	4.1%	5.6%
Local Authority	Count	15	0	6	21
	% within SEA	8.5%	0.0%	4.1%	6.2%
Political Party	Count	1	0	0	1
	% within SEA	0.6%	0.0%	0.0%	0.3%
Private Sector	Count	1	0	3	4
	% within SEA	0.6%	0.0%	2.0%	1.2%
Research Organisation	Count	2	1	4	7
	% within SEA	1.1%	6.3%	2.7%	2.1%
Youth Organisation	Count	12	0	7	19
	% within SEA	6.8%	0.0%	4.7%	5.6%
Other	Count	17	2	12	31
	% within SEA	9.6%	12.5%	8.1%	9.1%
Total	Count	177	16	148	341
	% within SEA	100.0%	100.0%	100.0%	100.0%