

[REDACTED]
National Broadband Plan Division
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31 January 2018

**Re: Strategic Environmental Assessment and Appropriate Assessment of
the National Broadband Plan – Intervention Strategy**

[REDACTED]
Thank-you for your email regarding the Strategic Environmental Assessment
(SEA) Environmental Report and Appropriate Assessment for the Draft National
Broadband Plan – Intervention Strategy.

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

Biodiversity Flora and Fauna
Non-Technical Summary

Page 11, Table 1.6, Strategic Environmental Objectives refers to 'protected
views'. It is unclear how these are determined and whether cross border 'views'
were considered. For example the boundary of the Ring of Gullion Area of
Outstanding Natural beauty (AONB) is contiguous with the Border and the
Sperrin AONB has clear views into landscapes across the Border. Views both to
and from 'designated areas' are important. Furthermore no account appears to
have been taken of the impact on the wider landscape, which despite being
outside designated areas, may be of high quality or locally important.

Page 13/14, European Site Protection Policy – can this policy be expanded to
include a requirement to contact NIEA in the event of any likely significant
effects on designated European sites within Northern Ireland.

Page 29, Environmental Assessment: states that no national datasets are
available for landscape. Please note the 'Northern Ireland Regional Landscape
Character Assessment' and the 'Regional Landscape Character Assessment
2000' available at <https://www.daera-ni.gov.uk/articles/landscape-character-northern-ireland> for the cross border areas and NI Regional Seascape



Character available at <https://www.daera-ni.gov.uk/articles/seascape-character-areas>.

Marine

From a marine perspective, it is important that transboundary aspects on the marine area are considered and made more explicit across all SEA topic areas, especially given the shared waters of Carlingford Lough and Lough Foyle.

This could for example have been included in:

- The section on Transitional and Coastal Water under the Water topic at 6.2.4.
- Table 1.6: in relation to protection of marine cultural heritage and seascape. These could have also been drawn out in section 6.2.7 and 6.2.8 and further reflected in Chapter 7 and the assessment of preferred strategy chapter; and
- The section on Cumulative and Transboundary Impacts under section 9.3.2.

To assist you in your consideration of marine transboundary aspects, attention is drawn to the UK Marine Policy Statement.

It is also suggested that:

- Page 4 – section 1.5: should be amended to “Ireland shares a land boundary and marine waters with Northern Ireland.”
- Page 40 – Section 5.6.3: reference to the EU Directive is amended to Maritime Spatial Planning Directive
- The Landscape topic should also have included consideration of Seascape.
- Page 35 – Table 5.2 and Appendix B should have included the EU Maritime Spatial Planning Directive

Historic Environment

Historic Environment Division welcome consideration of Northern Ireland’s Historic Environment within the report content, through reference to the State of the Environment Report. We highlight that some Heritage Assets such as the Ulster Canal and the Black Pigs Dyke have constituent elements on both sides of the Border while other assets adjacent to it should be considered in light of potential impacts on their setting or through physical impacts of cross border broadband infrastructure. At the site specific level we would recommend that cognisance be given to our spatial datasets for Northern Ireland’s Historic Environment, available for download at the attached link <https://www.communities-ni.gov.uk/publications/historic-environment-digital-datasets>



Page 28, references to Impacts in section 5.3.2 and on page 34, Assessment of Effects in Section 5.4, should also clearly note the possibility of Transboundary impacts on transitory species which may impact on designated sites north of the Border, for example the potential Whooper Swan movement between Lough Swilly SPA and Lough Foyle SPA and the linkage between the River Finn and the River Foyle SCAs.

Page 51 refers to mitigation measures for pNHAs, NHAs, statutory Nature Reserves, Refuges for fauna and Annex 1 Habitats outside of European sites but does not reference 'designations' in Northern Ireland, some of which directly adjoin the Border. Likewise, it is unclear whether European sites in Northern Ireland will be afforded the same measures as those in the Republic of Ireland. It would be helpful if this could be clarified within the text.

Please contact the SEA Team at [REDACTED] should you have any queries or require clarification.

Yours sincerely

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