

National Broadband Plan – SEA Public Consultation
National Broadband Plan Division
Department of Communications, Climate Action and Environment
29-31 Adelaide Road
Dublin 2
D02 X285

Submitted via email: NBPenvironmental@dccae.gov.ie

1 February 2018

Dear Sir or Madam,

Re: National Broadband Plan – SEA Public Consultation

We refer to your recent Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) of the National Broadband Plan – Intervention Strategy and have outlined our submission below.

1. Have the relevant aspects of the environment as they relate to the NBP-Intervention Strategy been described? Yes

Further observations: None

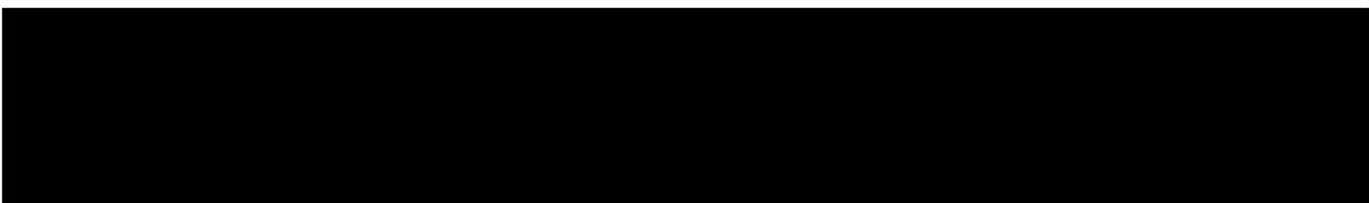
2. Have the relevant significant effects [positive and negative] of implementation of the NBP-Intervention Strategy been considered? Yes

Further observations: None

3. What amendments to the Intervention Strategy are required to adequately reflect the findings of the SEA and NIS?

The SEA Environmental Report Chapter 10 identifies mitigation measures aimed to reduce negative impacts on the Environment. Under the Heading General Guidance and Recommendations in Section 10.1 the mitigation measure under the 4th bullet point is worded:

Avoid siting new broadband network infrastructure within, immediately adjacent to or adjoining any Natura 2000 Site in order to limit the potential habitat/species loss impacts and disturbance to habitats and species therein during construction and/or operation.



This wording suggests no new infrastructure can be sited 'within, immediately adjacent to or adjoining any Natura 2000 Site'. In some locations this could present significant restrictions on any proposed pole and string solution required to access dwellings within or near any Natura 2000 Site. It is to be noted that these dwellings may be required to be served by the NBP. It is likely that such premises and other premises adjacent to Natura 2000 sites can only be served by utilising some or all of the existing infrastructure traversing such sites, whether by upgrading or completing it. The wording of Section 10.1 referred to above could be interpreted as saying that no new infrastructure can be located within or adjacent to any Natura 2000 Site. This would effectively result in some premises having to be excluded from the Intervention Area as defined in the National Broadband Plan. Whilst it is reasonable to expect siting to avoid Natura 2000 sites where possible a blanket ban on new infrastructure within or near these sites would represent a major constraint and could mean that parts of the project may not be able to be constructed. It is also noted that in many cases new infrastructure should be able to be located within these designated Sites without a likely significant effect on the site qualifying features. We assume this text is probably not intended to represent a blanket ban on new infrastructure within Natura 2000 sites. However, it would benefit from the addition of the words "**where possible**" (similar to current wording under the 6th bullet point):

Avoid [where possible] siting new broadband network infrastructure within, immediately adjacent to or adjoining any Natura 2000 Site in order to limit the potential habitat/species loss impacts and disturbance to habitats and species therein during construction and/or operation.

Likewise, we suggest inclusion of "**where possible**" for mitigation measures under the 11th bullet point and 14th bullet point:

11th bullet point:

Ensure that [where possible] no development, including clearance and storage of materials, takes place within a minimum distance of 15m measured from each bank of any river, stream or watercourse. The extent of these buffer zones should be determined in consultation with a qualified ecologist and following a Flood Risk Assessment. Any hard landscaping proposals should be located outside of these buffer zones;

14th bullet point:

Avoid [where possible] development of infrastructure in flood risk areas. Reference should be made to the planning System and Flood Risk Management for Planning Authorities (DECLG/OPW 2009) and the National Flood Hazard Mapping (OPW) while referring to the relevant Flood Risk Management Plan (FRMP).

Yours sincerely,



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