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Geothermal Consultation
Geoscience Policy Division
Department of the Environment, Climate and Communications
29-31 Adelaide Road
Dublin, D02 X285
Ireland
1 March 2022

Dear sir/madam,

Re: Draft Policy Statement on Geothermal Energy for a Circular Economy SEA Environmental Report and Natura Impact Statement (NIS).

Thank you for your correspondence regarding the SEA Environmental report and NIS for the Draft Policy Statement for Geothermal Energy. The Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA) and (supported with a service level agreement) DfC Historic Environment Division (HED), has considered the consultation and associated documents and our opinions are set out below and in the additional attachment from HED.

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.

A description of the current state of the environment and how this relates to the proposed Framework 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.

Natural Environment Division Comments

NED welcome that our comments have been taken on board and consideration of transboundary issues for the natural environment / heritage has been given throughout the SEA and NIS.

NED note that the Draft Policy Statement for Geothermal Energy for a circular Economy is limited to within Ireland and welcome the acknowledgement and consideration of transboundary environmental effects within the SEA. We note that geographical locations have not been identified at this stage and welcome that AA on lower tier plans and sectoral plans will consider transboundary issues in more detail. Consultation should be undertaken with the relevant NI authorities as appropriate once geographical context has been identified and where there is potential for transboundary effects including those outside of European sites e.g. cross boundary priority habitats. NED are of the opinion that there should be a solid commitment within the SEA report and the Natura Impact Assessment to consult with the relevant authorities in NI at project level should transboundary effects be identified or likely.

We welcome the proposed monitoring and mitigation. Any guidance developed should consider transboundary issues and could benefit from engagement with relevant NI authorities and stakeholders.

We welcome that Appropriate Assessment has been carried out and that the NIS has considered NI European Sites. We however note that further Appropriate assessment may be required at project level and advise early engagement with the relevant bodies in NI should there be any potential transboundary effects on NI European sites.

Please note following the decision of the United Kingdom to leave the European Union, the collective term of “Natura 2000” sites the network of European protected sites are now known as “National Site Network” sites within the United Kingdom, and is including Northern Ireland.

Water Management Unit Comments

Water Management Unit welcomes the recognition of the issue of water management and the potential impacts for both water quality and water resource that could result on implementation of the policy and that these have been identified and considered within the report. Water Management Unit consider these could have the potential to be transboundary impacts



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Water Management Unit recognises the report demonstrates cognisance of draft NI 3rd Cycle River Basin Management Plans for Northern Ireland and would advise that the finalised plans are due to be published 9th April 2022.

Water Management Unit is broadly supportive of the mitigation measures proposed.

With regard to the monitoring Water Management Unit would recommend the effects of the implementation of the policy be considered against appropriate monitoring measures in relation to both water quality and resource, but recognise that this site specific monitoring is appropriate at the individual project scale. It is essential that associated trigger actions and interventions (including policy revisions where required) are undertaken if any unforeseen or adverse environmental effects to the aquatic environment are identified as a result of the policy.

Yours faithfully

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Date: 23/02/2022

HISTORIC ENVIRONMENT DIVISION COMMENTS RE: SEA ENVIRONMENTAL REPORT OF IRELAND'S POLICY STATEMENT ON GEOTHERMAL ENERGY

DfC Historic Environment Division (HED) operate via a Service Level Agreement with colleagues in DAERA in relation to SEA, whereby, we provide authoritative comment and advice in relation to matters of Cultural Heritage including archaeological and architectural heritage. We make the following comments in respect of the documentation received by our office on 04/01/2022.

HED welcomes that the Environmental Report includes an assessment of the impacts of the Policy Statement on Geothermal Energy on cultural heritage, and that our scoping consultation comments have been acknowledged. As previously advised, a large number of heritage assets predate the border itself and some, such as bridges and mill races traverse it. The potential for impacts on transboundary cultural heritage, including the inter-relationships of sites, buildings and places and their settings and the understanding and the experience of them, should therefore also be taken into account in the assessment.

HED acknowledges that the scope of the Policy Statement will not geographically specify where measures will be applied. As acknowledged in Table 8.1 however, the potential for negative impacts on cultural heritage, will be dependent on location. The proposed mitigation measures as outlined in Table 8.3.1 are therefore welcomed to ensure that the policy is accompanied by a suite of guidance, codes of practice and subordinate legislation so that environmental impacts, including those on transboundary cultural heritage, are appropriately considered and managed.

Table 8.3.4 sets out the regulatory thresholds for different types of geothermal installations, based on the scale of energy production. As acknowledged in the discussion, smaller domestic scale installations will not be subject to a regulatory regime, and while small individual proposals may not in themselves present a significant environmental effect, multiple geothermal developments of varying scales along the border region, may give rise to cumulative negative

impacts on transboundary cultural heritage assets. In taking forward mitigation measures of further studies on clustering potential and research on oversight approaches, engagement with relevant stakeholders in Northern Ireland will therefore also be required. In the context of transboundary cultural heritage, and considering Monitoring Objective 3, Table 9.4, HED historic environment datasets <https://www.communities-ni.gov.uk/publications/historic-environment-digital-datasets> and map viewer <https://www.communities-ni.gov.uk/services/historic-environment-map-viewer> should also be utilised to close built heritage data gaps, inform relevant guidance and best practice, and regulatory approaches toward better protection of Cultural Heritage in line with SEA Objective 8.

In the context of policy development for renewable energy, the Department for Infrastructure (DfI) in NI has recently undertaken a review of SPPS Renewable and Low Carbon Energy policy. Further details on the consultation is available to view at <https://www.infrastructure-ni.gov.uk/publications/review-strategic-planning-policy-renewable-and-low-carbon-energy>

The Department for the Economy (DfE) has also recently published its Energy Strategy – Path to Net Zero Energy <https://www.economy-ni.gov.uk/publications/energy-strategy-path-net-zero-energy>. References related Geothermal Energy are outlined on page 46.

Should you have any queries in regard to the content of our response please contact us at the above address.

Yours sincerely

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