



Department for Infrastructure

Strategic Environmental Assessment (SEA) Statement

Regional Strategic Planning Policy on Renewable and Low
Carbon Energy

663592-04-Rev04

2025

RSK



RSK GENERAL NOTES

Project No.: 663952-04-Rev04

Title: Strategic Environmental Assessment (SEA) Statement
Regional Strategic Planning Policy on Renewable and Low Carbon Energy

Client: Department for Infrastructure

Date: NOVEMBER 2025

Office: Manchester

Status: FINAL

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Date:

NOVEMBER 2025

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NOVEMBER 2025

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1 INTRODUCTION

1.1 Background and Legislative Context

Strategic Environmental Assessment (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.

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).

RSK Environment Ltd (hereafter 'RSK') has been instructed by the Department for Infrastructure (the Department) to carry out a Strategic Environmental Assessment (SEA) of the revised Regional Strategic Planning Policy on Renewable and Low Carbon Energy (R&LC E), will replace the Subject Policy 'Renewable Energy' contained within the Strategic Planning Policy Statement (SPPS) for Northern Ireland (NI). Hereafter this will be referred to as 'the Policy'.

The process consists of four main components.

- The preparation of an Environmental Report, where the likely significant effects of the Policy are identified and assessed. The Environmental Report is the principal document in the SEA process and summarises the likely effects of the Policy on the environment, and measures which would mitigate any significant adverse effects.
- A consultation on the Environmental Report and the Policy with the public, statutory environmental bodies, and any EU Member State which might be affected.
- The consideration of the findings of the Environmental Report and the consultation process in deciding whether to adopt or modify the draft Policy.
- The publishing of the decision to adopt the Policy and how the SEA process influenced the final outcome.

The Department published the SPPS for NI in September 2015. On 21 April 2021, former Infrastructure Minister, Nichola Mallon announced her decision to review the regional strategic planning policy on renewable and low carbon energy, as contained in the SPPS. Officials have been progressing the review in accordance with policy development best practice, including during the previous tenure of former Infrastructure Minister, John O'Dowd MLA, and current Infrastructure Minister, Liz Kimmins MLA. The draft Policy was consulted on between April 2023 and June 2023. Following the consultation period the draft revised Policy was updated in light of the consultation responses and agreed by the NI Executive Committee on 2nd October 2025. The revised Policy was subsequently published in December 2025. . As such in accordance with Statutory Instrument SR 280/2004, a statement is required to be prepared providing information on this decision (the "SEA Statement").

1.2 Summary of the SEA Process

The SEA Guide produced by the Office of the Prime Minister (ODPM) (now Ministry of Housing, Communities and Local Government), Welsh Assembly Government and DOE in 2005 and sets out a five stage process for carrying out SEA. These stages are summarised in Table 1.1 below.

Table 1.1: Stages in the SEA Process

Stage	Tasks
Pre-review	If SEA is not mandatory, screen for possible significant environmental effects
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope	Step 1: Describe briefly the statutory purpose, geographic area, population, and timeframe of the plan, and its relationship (both vertical and horizontal) with other plans/programmes.
	Step 2: Summarise the main findings of the survey and analysis stage.
	Step 3: Describe in general terms the current state of the physical environment of the area, with particular reference to (a) areas of environmental importance (such as protected sites); and (b) areas experiencing environmental problems (such as waste, or air or water pollution) at present. Describe how that environment would be likely to evolve on the basis of current development trends but no change in current policies.
	Step 4: Define (a) broad planning policy objectives for the area based on Steps 1 and 2; and (b) relevant environmental policy objectives for the area taking account of national policy and any relevant international legal obligations (e.g. EU Directives).
	Consult the Consultation Bodies on the scope of the SEA.
Initial public consultation	
Stage B: Developing and refining alternatives and assessing effects	Step 5: Identify a number of reasonable alternative development strategies for the area which are capable of fulfilling the policy objectives established in Step 4.
	Step 6: Evaluate these alternative strategies against the chosen planning and environmental policy objectives (step 4), with a view to establishing the most sustainable option.
	Step 7: Select the preferred strategy (which may combine elements of different strategies), stating reasons for the choice, and work it up with detailed policy objectives.
	Step 8: Carry out an environmental assessment of the preferred strategy to determine whether implementation would be likely to cause any significant effects on the environment (in particular, the aspects listed in Annex I of the SEA Directive, such as biodiversity, air, cultural heritage, etc.).
Stage C: Preparing the Environmental Report	Step 9: Modify the preferred strategy to eliminate, reduce or offset any significant adverse effects, as appropriate.
	Step 10: Propose monitoring measures in relation to any likely significant environmental impacts.
	Step 11: Prepare a non-technical summary.

Stage	Tasks
Stage D: Consulting on the draft plan or programme and the Environmental Report	Step 12: Consult the public and Consultation Bodies on the draft plan or programme and the Environmental Report.
	Step 13: Assess significant changes.
	Step 14: Make decisions and provide information.
Stage E: Monitoring the significant effects of implementing the plan or programme on the environment	Step 15: Develop aims and methods for monitoring.
	Step 16: Respond to adverse effects.

Interaction between the Department and RSK to prepare the Scoping Report (end of Stage A), the Consultation Environmental Report (end of Stage C) and the final Environmental Report (end of Stage D) was an iterative process. The consultation phases on these documents with statutory environmental authorities (“Consultation Bodies”), the public and EU Member States were more formal in nature and are described in Section 3 below.

1.3 Purpose of the SEA Statement

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 Policy and related monitoring measures.

Upon adoption of the Policy, the SEA Statement must be made available to the Consultation Bodies, the public, and where relevant 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 Policy;
- How submissions and observations made to the Department, consultation outcomes, and the Environmental Report were integrated into the Policy;
- The reasons for choosing the Policy as adopted, in the light of other reasonable alternatives considered; and
- The measures decided upon to monitor any significant adverse effects, as well as any potential unforeseen adverse effects arising from the implementation of the Policy.

2 SUMMARY OF HOW ENVIRONMENTAL CONSIDERATIONS WERE INTEGRATED INTO THE POLICY

2.1 Introduction

Environmental considerations were integrated into the Policy through the SEA process, which was carried out in parallel with the drafting of the Policy. Results from the different stages of the SEA process were fed back to the Department through the draft reports.

2.2 Environmental Baseline

An analysis of baseline information has been carried out to provide an evidence base for current and likely future environmental conditions without the Policy. Key environmental and sustainability issues for Northern 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 Policy.

Information for this section has been obtained from Department of Agriculture, Environment and Rural Affairs of Northern Ireland (DAERA), Northern Ireland Environment Agency (NIEA), Northern Ireland Statistics and Research Agency (NISRA) websites and other publicly available information sources.

The environmental baseline maps for NI, in respect of each of the sustainability topics, are provided within Appendix A of the Environmental Report and strengths. These were fed back to the Department through the draft Scoping Report and draft Environmental Report.

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

The Environmental Report was prepared to carry out an evaluation of the likely environmental effects of the implementation and non-implementation of the Policy.

The draft Policy 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 policy themes within the Policy.

Assessments of alternatives for each of the nine policy themes has been undertaken, along with an assessment of likely cumulative effects of the Policy as a whole and likely in-combination effects of the Policy with other plans and programmes.

The results of the assessment are detailed in the Environmental Report and these have been fed back to the Department through the draft report.

2.4 Mitigation Measures

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’.

Some high level environmental protection text has already been included within the Policy as embedded mitigation. Embedded mitigation is included within policy RLE 25, RLE 10, RLE 13 and RLE 24.

Through iterative discussion with the SEA team and the Department, minor changes have been made to the Policy text to further safeguard against potential adverse effects on the environment. This has included incorporation of text regarding in-combination impacts and archaeological interests in RLE 10.

Following discussions with the Department and the SEA team the importance of peatland has been acknowledged and the policy direction on active peatland has been maintained and enhanced to include consideration of the impacts on degraded peatland on a case-by-case basis.

The SEA process identified some uncertain/adverse effects on the environment of the proposed Policy being implemented. Adverse effects would be minimised through the undertaking of lower-tier environmental assessments (SEA/Environmental Impact Assessments/Habitat Regulations Assessments), including compliance with the most up-to-date legislation and the use of Construction and Environmental Management Plans. RLE 24 incorporates this requirement stating:

“For all development, applicants, operators, planning authorities and statutory consultees will be bound by environmental legislation requirements such as The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 as amended and The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017. Proposals for renewable and low carbon energy must be assessed for their environmental impacts (covering installation, operation, and decommissioning stages, as appropriate) and comply with the relevant environmental legislation, case law, policy and guidance prevailing at the time.”

3 SUMMARY OF HOW SUBMISSIONS, OBSERVATIONS AND CONSULTATIONS WERE INTEGRATED INTO THE POLICY

3.1 Introduction

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

Table 3.1: Consultation Dates

Date	Consultation
May 2022 - July 2022	SEA scoping consultation
April 2023 - June 2023	Public consultation on draft Policy and ER

3.2 SEA Scoping Consultation

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 is finalised.

Initial scoping consultation was carried out in 2019, however review of the Policy was put on hold and further scoping consultation was carried out again in 2022.

Initial informal contact was made with the Consultation Bodies to notify them of the drafting of the Policy and the SEA, and to elicit advice on what should be covered in the SEA, key environmental issues being faced by NI and relevant information sources to guide the SEA.

A five-week consultation exercise supported by a draft SEA Scoping Report was carried out in June 2022. This included:

- DAERA - NIEA:
 - Natural Environment Division;
 - Historic Environment Division;
 - Climate Change Unit;
 - Drinking Water Inspectorate;
 - Water Management Unit;
 - Marine and Fisheries Division;
 - Inland Fisheries; and
- Environment Protection Agency (EPA).

The scoping consultation responses that were received have been reproduced in Appendix A, along with a comment on how they have been accounted for in the

preparation of the Environmental Report. The scoping consultation comments were taken on board in the production of the Environmental Report resulting in:

- Additions and updates to baseline data;
- Minor changes to SEA Sub-objectives;
- Additional plans and programmes reviewed; and
- Points raised taken into consideration during the SEA environmental report.

3.3 Consultation on the Draft Policy and Environmental Report

The Environmental Report and the draft Policy were presented for public and statutory consultation over the period from April – June 2023. 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 the draft Policy.

Feedback from the public consultation was gathered through an online questionnaire as well as submissions sent by email or post. The online questionnaire asked the following questions:

Q1. Do you agree, that overall, the revised policy will help to ensure that the planning system can play its part in supporting wider efforts of government in addressing climate change and decarbonising the energy sector? If not, please explain how the draft policy can be improved.

Q2. Do you agree that the new provisions for a spatial approach through LDPs will assist in providing certainty and clarity to planning authorities, communities and developers alike by providing a presumption in favour of development in areas identified in LDPs? If not, please explain how the draft policy can be improved.

Q3. Do you agree with the draft revised policy approach to provide a presumption in favour of re-powering, extending and expanding solar and wind farm developments, where appropriate? If not, please explain how the draft policy can be improved.

Q4. Do you consider that the draft revised policy provides an appropriate regional strategic planning policy framework for plan-making and decision-taking for all forms of renewable and low carbon energy development? If not, please explain how the draft policy can be improved.

Responses were received from statutory and non-statutory consultation bodies. While most of the consultation comments related to the draft Policy, a number provided comments on the SEA Environmental Report.

In line with the SEA Directive and SI 435/2004, comments from these bodies, members of the public, and other stakeholders were duly noted and considered, and if appropriate addressed in the final Policy document. The consultation responses are reproduced in Appendix B, along with a comment on the action taken in response to the comments within the Environmental Report. In response to the consultation comments, the following changes were made to the Environmental Report:

- Additions made to baseline data; and
- Additions/clarifications made to the assessment.

Appendix C includes a summary of the public consultation submissions as they relate to the draft Policy. It does not purport to represent all of the opinions and suggestions in the

submissions. Rather, it is designed to offer a flavour of some of the common themes that arise in the submissions and a sample of the suggestions made.

The main theme of the public consultation comments relating to the SEA process are summarised below.

Policy Assessment Outcomes

One response expressed disagreement with the SEA assessment outcomes, either in general or regarding specific aspects of the Policy. The policy assessment has been reconsidered in light of the responses received and where necessary the assessment updated. It is recognised that SEA is a high-level process relying on expert judgment, thus allowing for differing opinions on assessment outcomes based on the observer's standpoint. The SEA team is content with the robust and objective completion of the assessment process, following standard methodologies aligned with relevant guidance. These methodologies have been accepted by statutory bodies for other equivalent strategies in NI.

The discussed monitoring measures will serve to verify the assessment outcomes in the future. If any additional unforeseen effects emerge during this period, it will provide an opportunity to identify and implement additional mitigation measures.

Baseline Information Inclusion and Accuracy

Suggestions have been proposed regarding updating baseline information in alignment with the latest available resources or incorporating new sources to augment the baseline data pertaining to NI's environment, as well as rectifying any stated inaccuracies. In order to ensure the precise representation of baseline data, these recommendations have been reviewed, and the baseline data section of the Environmental Report has been revised accordingly.

Additional Guidance Recommendations

Responses included suggestions for considering guidance documents to support and enhance the analysis presented in the environmental report. Each suggestion has been thoroughly reviewed, and those deemed appropriate have been carefully considered within the Environmental Report.

Assessment and Considerations of Alternatives

Concerns were raised regarding the assessment and consideration of alternatives despite acknowledging adverse risks. Recommendations to reconsider the assessment and explore alternative options have been made. In cases where this was applicable, the assessment has been reassessed, taking into account the responses. Where agreed upon by the authors of the Environmental Report, changes have been made in light of the new opinions. However, in some instances, it remained unchanged.

3.4 Transboundary Considerations

The potential for transboundary effects was identified in relation to the Republic of Ireland. It has been assessed that there will be no significant adverse transboundary effects as a result of the implementation of the Policy.

The Department issued two consultations to EPA on 6 April 2023. However, no responses were received.

3.5 Modifications to the Policy following Consultation

Since completion of the public consultation exercise between April - June 2023, and Executive Committee write around between September 2024 - October 2025, the key Policy Themes have remained the same, however some of the policy provisions have been amended.

The following outlines the changes made to the Policy as a result of the consultation:

- RLE 1: Minor revisions have been made to improve readability and context.
- RLE 2 and RLE 3: Minor revisions have been made to improve clarity and readability.
- RLE 5: Minor adjustments have been made to ensure consistency of policy wording and to assist the readers' understanding of emerging and advancing technologies. A new footnote has also been added to clarify that the policy only applies to energy support technologies and energy storage systems where these are associated with renewable energy developments (i.e. it excludes waste energy proposals, electricity generated from using fossil fuels etc). Additionally, clarity has been provided regarding the policy's applicability, excluding low-carbon energy developments not associated with renewable energy sources.
- RLE 6: A minor addition has been made, and part of the policy text reworked and relocated to RLE 8.
- RLE 7: The Regional Strategic Objectives (RSO) have been refined and improved, where appropriate, to better reflect the intended policy outcomes.
- RLE 27: The draft policy has been reworked for the purposes of improving the finalised policy provisions. Some wording has been moved to a footnote (footnote 62). and additional text included in order to signpost other relevant policies contained in the SPPS, including 'Coastal Development'. Some changes/clarifications made to policy wording to improve readability. Footnote 62 is a new addition and reads "The Marine Plan for Northern Ireland and the UK Marine Policy Statement are relevant in all decisions which affect, or may affect the marine area, as required by marine legislation."
- RLE 9: The policy provisions have been refined to better reflect intended policy directions and the policy provision related to the spatial approach has been removed.
- 1.10: The decision not to pursue a spatial approach, as proposed, has led to related provisions not being carried forward. However, certain provisions regarding landscape impacts have been retained (RLE 10, RLE 12, and RLE 20).
- RLE 12: Minor amendments have been made to improve the flow and clarity of the policy provisions. Additionally, UNESCO Global Geoparks and archaeological has been added. The policy has expanded on the need to pay particular attention to landscape and visual impacts of proposals. A footnote has been included to clarify that the cautious approach will also apply to onshore development associated with offshore proposals.
- RLE 10: Wording ("which cannot otherwise be mitigated") has been deleted as it was deemed unnecessary. Footnote 52 now reads, "Planning applications should

be accompanied by details on matters such as the power generation / capacity associated with the proposal, e.g. megawatts (MW/MWh).” Footnote 53 is a new addition (replicated from PPS 18) and reads “Sensitive receptors are defined as habitable residential accommodation (although not necessarily occupied), hospitals, schools, and churches.” The revised SPPS makes clearer the planning considerations to be taken into account. There is added text provided in order to cross-reference with policy RLE 12.

- RLE 8: The policy has been reworded to provide appropriate direction and clarity on policy application, and gives appropriate weight to climate emergency/targets and biodiversity. The final policy wording also clarifies that moratoriums on applications during the preparation or updating of Local Development Plans (LDPs) are not appropriate. Footnote 51 is a new addition and reads “Or any future revised government targets.”
- RLE 13: Minor enhancements have been implemented to improve readability.
- RLE 24: Text has been added for clarity purposes. Footnote 60 (previously footnote 6) is unchanged from the draft revised SPPS and reads “DAERA has developed a draft Northern Ireland Peatland Strategy 2021-2040 which will provide a framework for conserving intact semi-natural peatlands and restoring degraded semi-natural peatlands.”
- RLE 14: The policy wording has been revised to reflect a change in the approach to separation distances. Footnote 56 (previously footnote 5) is unchanged from the draft revised SPPS, “Development comprising more than two turbines.”
- RLE 15: The wording of this section has been revised in response to comments received on the draft policy and to address misunderstandings. The phrase "of low ecological value" has been deleted as it is considered addressed in RLE 10. Clarity has been provided regarding solar farm development in appropriate countryside locations, and the policy also includes “In all locations” to clarify last provision now applies to both urban and rural locations.
- RLE 16: A provision has been added to reflect that the benefits of AD development proposals may outweigh the benefit of the development being beside the waste source.
- RLE 17: Following consideration of the public consultation responses, these provisions have been refined to better reflect the intended policy direction. Wording has been amended and the policy provision with regards to ‘use in perpetuity’ have been removed as the spatial approach is no longer being taken forward into the final revised policy. The provision regarding time-limited approvals has been removed as it is no longer considered necessary since this is a normal planning consideration and no longer requires clarification.
- RLE 18: The policy provision has been expanded to support and encourage energy harnessing of renewable and low carbon energy from new and extant developments.
- RLE 19: Minor amendments made to improve clarity and readability.
- RLE 11: Minor changes and additions have been made to enhance clarity. Footnote 54 is unchanged from the draft policy.

- RLE 21: The term "affected" has been inserted as per IOA Good Practice Guide, with a new footnote 59, which reads "or any future update to this UK standard and/or guidance", included to future-proof the policy.
- RLE 22: Changes have been made to support emerging technologies where this is appropriate and sufficient evidence allows for addressing potential adverse impacts. Policy wording has been expanded to detail various options for introducing emerging technologies into planning.
- RLE 20: Minor changes and clarifications have been made to improve readability. Footnote 57 has been added for increased clarity and reads "The Northern Ireland Regional Seascape Character Assessment refers." Footnote 58 added to future-proof the policy and reads 'or any future update to it by DAERA.'
- RLE 28: Minor clarification has been made.
- RLE 25: The policy provision has been amended to clarify its context within powerline connections associated with renewable and low-carbon energy developments, as opposed to power line applications in their own right which would principally be dealt with under other policies. Advice on gaining grid connection has been moved to Footnote 61 and reads "The grant of planning permission does not guarantee grid connection. Connection to the grid falls within the remit of Northern Ireland Electricity Networks (NIE Networks) and therefore liaison with NIE Networks, or the relevant authority at an early stage of development is paramount in relation to the viability of such a scheme."
- 1.22: Minor revisions have been made to the policy text and it has been relocated to RLE 20.

The overview of key Policy changes is provided as Appendix D.

4 CONSIDERATION OF ALTERNATIVES

4.1 Introduction

Consideration of alternatives is a key feature of the SEA process as defined by the SEA Directive and the SEA Regulations. In practical terms, it refers to possible alternative mechanisms for delivering the goals of the Policy, and the assessment of the impacts of each of these options against the SEA objectives.

SEA guidance recognises that it is not for the SEA to decide on the options to be considered. This SEA therefore focuses on the alternative delivery options actually considered in the preparation of the Policy by the Department.

4.2 Outline Summary of Alternatives Considered

For each Policy Theme, between two and four alternatives were identified, and they are described below.

Policy Theme 1 - Regional Strategic Planning Policy and Energy Targets

OPTION 1: Retain the existing policy approach of the SPPS.

OPTION 2: Revise existing regional strategic planning policy to remove the reference to renewable energy targets but maintain the broad existing policy approach.

OPTION 3: Revise the policy approach to reflect the latest wider contemporary context, and strengthen the link between planning and the ambitions of the Energy Strategy and the Climate Change Act.

OPTION 4: Option 3 above plus a requirement to undertake a site specific assessment which considers the impact of development on peatland, including the likely effects on carbon emissions, to assist in the determination of planning applications.

Policy Theme 2 – Locational Consideration

OPTION 1: Retain the existing regional strategic planning policy approach.

OPTION 2: Revise regional strategic planning policy to introduce a new spatial approach to provide more clarity on where is, and where is not, acceptable for the provision of new and additional development. It is accepted that there are a number of options as to how a spatial approach for NI could be introduced.

Policy Theme 3 - Siting New Wind Farms in Perpetuity

OPTION 1: Retain the existing regional strategic planning policy approach.

OPTION 2: Revise the policy approach to support the long term re-use of land for new wind farm development on appropriate sites (subject to the need to satisfy the usual planning requirements when submitting new applications for wind farm development on such sites).

Policy Theme 4 - Wind Turbines and Amenity Considerations (Theme 4a - Noise Assessment)

OPTION 1: Retain the existing policy approach to noise in the SPPS and continue to use ETSU-R-97 as the assessment methodology.

OPTION 2: Provide new policy direction in the SPPS on noise impacts and wind turbines specifically. This could mean tailoring policy / bringing existing policy under the headline or developing new policy to provide either a more stringent or flexible approach to the consideration of noise impacts from wind turbine proposals.

Policy Theme 4 - Wind Turbines and Amenity Considerations (Theme 4b - Separation Distances)

OPTION 1: Retain the existing approach and standards in relation to separation distances to occupied property.

OPTION 2: Continue to include flexibility in relation to separation distances but to consider the appropriateness of the current standards and their application for wind farms and single turbines.

OPTION 3: Strengthen the current approach (for example to encompass proximity to road networks) and introduce mandatory separation distances to be applied for all wind turbines (not just wind farms).

OPTION 4: Relax current policy to provide greater flexibility on the standards to be applied in relation to separation distances.

Policy Theme 4 - Wind Turbines and Amenity Considerations (Theme 4c - Shadow Flicker)

OPTION 1: Retain the existing approach to shadow flicker, as per the SPPS and Best Practice Guidance.

OPTION 2: Strengthen the policy approach in relation to shadow flicker.

OPTION 3: Relax the policy approach in relation to shadow flicker.

Policy Theme 5 - Decommissioning and Site Restoration for New Development

OPTION 1: Retain the existing policy provisions on de-commissioning and site restoration as currently worded i.e. 'In relation to developments such as wind farms and solar farms, applicants will be required to provide details on future decommissioning, including proposals for site restoration. In such cases planning conditions (or a legal agreement where appropriate) should be used.'

OPTION 2: Revise the policy approach to strengthen the requirements for decommissioning and site restoration (For example, to provide for the express use of financial guarantees through planning agreements as part of the approval of planning permission).

Policy Theme 6 - Solar Farms And Agricultural Land

OPTION 1: Retain existing policy approach.

OPTION 2: Amend the policy approach to encourage and support, for example, a preference for the use of previously developed land for solar farms.

OPTION 3: Strengthen the policy approach to require, for example, that Greenfield land should not be developed for solar farms where alternatives exist on previously developed lands.

Policy Theme 7 - Co-Locating Renewable, Low Carbon And Supporting Infrastructure

OPTION 1: Retain the existing regional strategic planning policy approach.

OPTION 2: Revise regional strategic planning policy: Introduce new policy provisions for the co-location of renewable and low carbon technologies and supporting infrastructure.

Policy Theme 8 - Re-Powering Existing Wind and Solar Farms

OPTION 1: Retain the existing policy approach without any specific provisions in relation to the re-powering of wind farms and/or other categories of renewable development.

OPTION 2: Revise policy to include new provisions to address and support the re-powering of existing wind farm developments only.

OPTION 3: Revise policy to include new provisions to address and support the re-powering of existing wind farm developments and other renewable technologies, as appropriate.

Policy Theme 9 - Emerging Technologies and Other Issues

OPTION 1: Retain the existing regional strategic planning policy approach.

OPTION 2: Strengthen and expand existing regional strategic planning policy for evolving new and emerging technologies.

4.3 Assessment of Alternatives

A high level matrix assessment has been carried out on each of the options under each Policy Theme 1 – 9 to determine how well each of the respective measures perform against the SEA Objectives.

Policy option 3 and 4 under PT1 have strong beneficial effects on climate as this would likely increase the number of planning applications for R&LC E especially where developments are shown to positively contribute towards targets. However, depending on the locations of the developments, this may increase the risk of adverse effects on cultural heritage, landscape and ecology and nature conservation. Option 4 which considers the effect of renewables on peatlands may lessen adverse effects on ecology and nature conservation by steering developments to other areas, although, it would not necessarily stop all development on peatland.

Policy Option 1 is deemed to be the preferred option under PT2 as this will place less restriction on the location of schemes meaning likely beneficial effects on climate and socio-economics. Under this option, the location of schemes can be assessed on a case by case basis where environmental sensitivities and landscape character can be determined at a site specific level.

For PT 3 beneficial effects are assessed for climate under Option 2 as this will help to support the ongoing need for renewable energy infrastructure. Siting wind farms in perpetuity makes the best use of resources and existing infrastructure. Extant planning permissions are currently long term, meaning developments should already be sited and designed to ensure effects are minimised and protect an acceptable level of amenity for adjacent communities.

From an SEA perspective there are uncertainties around both options under PT 4a in terms of health and quality of life due to lack of certainty surrounding the effects these options would have on safeguarding residential amenity from inappropriate development in terms of noise. The ETSU-R-97 standard and its good practice guidance is the current methodology for noise assessment and remains the preferred methodology for the acoustic measurement of noise from wind turbines in NI. It is noted that recent study commissioned by the Department for Business, Energy and Industrial Strategy based on a review of relevant research, field measurements and stakeholder engagement concluded that aspects of the guidance requires updating (in particular noise limits and the impact of amplitude modulation) (WSP, 2023). However, to date the guidance has not yet been updated, therefore either options has the potential to have uncertain or adverse effects. in terms of health and quality of life. The remaining SEA objectives remain neutral as a policy change regarding noise assessments is unlikely to have wider significant environmental effects beyond those specifically related to noise emissions as discussed.

For PT 4b option 1 - 3 perform identically in the SEA matrix. On balance, it is likely that Option 2 would allow for developments to be assessed on a case by case basis, in terms of separation distance while taking into account best practice guidance and lessons learnt in order to update standards if needed. Option 4 to relax the current policy approach is assessed to have minor adverse effects on residential amenity and therefore health and quality of life but would see minor beneficial effects for climate change due to a likely increase in R&LC E development. Most of the SEA objectives remain neutral as a policy change regarding separation distance alone is unlikely to have significant environmental effects.

For PT 4c option 1 and 2 perform similarly in the SEA matrix with positive effect on health and quality of life due to safeguarding of residential amenity. Option 3 to relax the policy approach is assessed as minor negative effect on health and quality of life, but would see minor positive effects for climate due to less restrictive policy. Most of the SEA objectives remain of neutral effect as a policy change regarding shadow flicker alone is unlikely to have significant environmental effects.

For PT 5 option 2 performs more favourably in terms of the SEA objectives; ecology and nature conservation, health, socio economics and landscape as this will ensure stronger likelihood of remediation of sites. However this may deter smaller companies who do not have the financial capability to ensure decommissioning from the onset and hence may act to limit or slow the deployment of renewable proposals.

For PT 6 the options perform similarly in the SEA matrix. Option 2 and 3 have beneficial effects for soil and land use as the use of previously developed land usually results in less damage/disruption and would safeguard high quality agricultural soil. It is noted that Option 3 may be too prescriptive as it is not always the case that previously developed land is less biodiverse and useful in terms of ecosystem services than greenfield land.

Uncertainties arise across a number of environmental objectives as at this high level it is unclear what beneficial or adverse effects may occur.

For PT 7 option 2 has a stronger beneficial effect on the climate change objective than Option 1 as a clear, consistent approach and direction to co-locating within the SPSS would help facilitate the development of renewable energy infrastructure by easing the issue of grid capacity. At present, grid capacity is adversely effecting energy generation potential in the renewables sector. Most of the SEA objectives remain neutral as co-locating alone is unlikely to have significant environmental effect.

For PT 8 option 2 and 3 which support re-powering are assessed as having strong beneficial effects on the climate change objective. Re-powering makes the best use of resources and existing infrastructure. Re-powering can increase capacity of existing sites which will play a key role in the transition to a low carbon economy and the achievement of energy targets. It is noted that Option 3 extends re-powering to other renewable technologies and this is considered favourable. At this high level, most of the SEA objectives remain neutral as re-powering will require planning permission and a renewed EIA and AA as appropriate.

Both options under PT9 perform alike in the SEA matrix. It is considered that Option 2 may better support, guide and facilitate evolving, new and emerging technologies however there is a danger of being overly prescriptive which may result in a gap in support for some that have not yet emerged.

4.4 Reasons for Selection of Chosen Alternative

PT 1 - Option 3 proposes revising the policy approach to align with current broader contexts, particularly focusing on integrating planning with the goals of the Energy Strategy and the Climate Change Act. This approach is expected to facilitate increased deployment of renewable and low carbon developments in NI, leading to carbon benefits. Furthermore, it aims to ensure a consistent and comprehensive process for evaluating such development proposals. The revision includes updating references to peatland in existing policy, directing decision-makers to relevant legislative provisions concerning peatland protection, and emphasizing the importance of both active and degraded peatlands.

PT 2 – Option 2 suggests revising regional strategic planning policy to implement a new spatial approach, aiming to enhance clarity regarding suitable locations for new developments in Northern Ireland. This approach acknowledges various possibilities for its implementation and recognises the efforts of certain planning authorities, such as Derry City and Strabane District Council and Fermanagh and Omagh District Council, in advancing local spatial policy within their respective plans. Notably, the Department references DfE's Energy in Northern Ireland 2022 Report, highlighting the significant contribution of specific council areas to renewable electricity capacity and generation. By introducing this spatial approach, the Department anticipates providing clearer guidelines on suitable development areas, benefiting both industry and communities. Additionally, it expects improved efficiency in processing planning applications.

However, following the public consultation period and review of consultation comments, the policy provisions regarding 'new spatial approach' have been removed and are no longer being pursued in the final revised Policy.

PT 3 – Option 2 suggests to revise the policy approach to support the long term re-use of land for new wind farm development on appropriate sites (subject to the need to satisfy the usual planning requirements when submitting new applications for wind farm development on such sites). The Department considers that this option would increase clarity and certainty for communities, developers and investors alike in respect of supporting suitable sites for wind farm development in the long term. This option would make the best use of land, wind resource and existing infrastructure, including grid connections for the long term benefit of current and future generations. In addition, Option 2 would also help support the achievement of the renewable energy and climate change targets.

However, following the public consultation period and review of consultation comments, the policy provisions regarding 'use in perpetuity' have been removed and are no longer being pursued in the final revised Policy. Subsequent to the amendment to the Policy, 'PT 3 - Siting New Wind Farms in Perpetuity' will not be addressed within this report.

PT 4a – Option 1 proposes maintaining the current policy approach to noise in the Strategic Planning Policy Statement (SPPS), along with the utilisation of the ETSU-R-97 methodology for assessment. The Department asserts that the existing provisions within the SPPS adequately address noise concerns and ensure its consideration in the planning process for wind turbine development, aiming to prevent adverse impacts on residential amenity. Additionally, the Department emphasises the importance of continuing to endorse ETSU-R-97 as the preferred UK standard for noise assessment, highlighting the necessity for decision-makers to carefully evaluate potential noise effects, including amplitude modulation, on nearby properties.

PT 4b – Option 2 suggests maintaining flexibility regarding separation distances while evaluating the suitability of current standards for wind farms and single turbines. The Department plans to uphold the allowance for flexible separation distances in future regional strategic planning policies. It intends to review existing standards concerning specified distances or distances relative to turbine size. Currently, the separation distance for single wind turbines is not explicitly outlined in policy. The Department will assess the adequacy of these standards for both wind farms and single turbines, considering factors such as safety and impact on surrounding areas.

PT 4c – Option 1 proposes maintaining the current approach to shadow flicker outlined in the (SPPS and Best Practice Guidance. The Department believes that existing technology and modeling techniques can effectively eliminate or manage shadow flicker through planning conditions. Notably, shadow flicker has not been reported as a significant issue following the construction of approved schemes. This option is perceived to support the pursuit of energy and climate targets without hindering operators' ability to maximize electricity generation. Overall, the current approach appears to enjoy general support.

PT 5 – Option 1 recommends retaining the current policy provisions concerning decommissioning and site restoration, as articulated in the existing wording. This entails requiring applicants for developments like wind farms and solar farms to furnish details regarding future decommissioning plans and proposals for site restoration. Planning conditions or, where suitable, a legal agreement should be utilized in such instances. The Department deliberated on the possibility of incorporating a policy directive for decision-makers to contemplate financial guarantees secured via planning agreements, such as

financial bonds. However, upon further review, it concluded that the existing arrangements are deemed appropriate for the present time.

PT 6 – Option 2 proposes amending the policy approach to promote and facilitate the utilization of previously developed land for solar farm development. The Department advocates for a more sustainable approach to solar farm projects, aligning with the overarching goals of the Strategic Planning Policy Statement (SPPS) which emphasize sustainable development and the optimal use of existing resources. This option aims to provide clearer guidance on crucial considerations for solar farm development, such as appropriate setbacks from roads and well-screened sites. However, it emphasises that the intention is not to entirely prohibit solar farm developments on agricultural lands. Rather, it seeks to maintain some flexibility while encouraging the preference for more sustainable locations. Ultimately, this approach is intended to support the achievement of climate and energy targets in a sustainable manner. However, following the public consultation period and review of consultation comments, it was decided to review of the wording of the policy and remove reference to encouraging and supporting use of previously developed land to address a potential tension/likely unintended consequence in terms of what is understood as ‘previously developed land’.

PT 7 – Option 2 suggests revising regional strategic planning policy to introduce new provisions for the co-location of renewable and low carbon technologies along with supporting infrastructure. The aim is to encourage the strategic placement of various renewable and low carbon technologies in one location to maximise electricity generation potential and optimize the utilization of associated infrastructure. This approach seeks to address issues such as dispatch down and curtailment related to grid capacity constraints. While the option does not intend to introduce explicit provisions for Battery Energy Storage Systems (BESS), it acknowledges that BESS could be considered as supporting infrastructure for primary developments where co-location could be advantageous.

PT 8 – Option 3 proposes revising policy to incorporate new provisions aimed at addressing and facilitating the re-powering of existing wind farm developments and other renewable technologies, where appropriate. The Department advocates for future regional strategic planning policy to endorse the principles of reuse, re-powering, or refurbishment of existing sites for renewable and low carbon energy, whenever feasible. This approach aims to maximise benefits derived from established infrastructure and grid connections, while also providing greater support for long-term increases in renewable generation to aid in achieving new energy targets. Importantly, this option emphasises that re-powering proposals should still be subject to standard planning considerations despite the focus on facilitating their implementation.

PT 9 – Option 2 suggests enhancing and broadening existing regional strategic planning policy to accommodate the emergence of new and evolving technologies in the renewable and low carbon sector. The Department acknowledges various approaches to implementing this option, such as incorporating general provisions to support all such developments or crafting specific policy directives for particular new technologies, including micro-renewables. However, it deems it appropriate for future regional strategic planning policy to offer strategic guidance for evolving, new, and emerging technologies. By doing so, the option aims to facilitate increased deployment of suitable renewable and low carbon developments in NI, thereby realising associated carbon benefits while ensuring proper consideration of any amenity or other effects.

5 MONITORING FRAMEWORK

5.1 Statutory Requirement

Article 10 of the SEA Directive requires the Managing Authority, to monitor significant environmental effects of implementing the Policy. 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.

It is important that any monitoring proposed by the SEA should aim to specifically monitor the impact of the Policy rather than monitoring trends in the baseline environment that would have occurred regardless. In accordance with the Ireland SEA Regulations, monitoring should also focus on aspects of the Policy where environmental impacts are predicted to be significant (or uncertain). However, the SEA did not predict any significant adverse effects of the Policy being implemented.

5.2 Monitoring Proposals

Regulation 16 mandates the Department to monitor significant environmental effects of Policy implementation to identify unforeseen adverse effects and take remedial action. Monitoring begins upon Policy adoption, with annual reporting, and periodic revisions to accommodate new methods and understanding of the baseline environment.

Monitoring proposed by the SEA should focus on the impact of the Policy revision rather than baseline environmental trends unaffected by the revision. According to NI SEA Regulations, monitoring should also prioritize aspects of the Policy where significant environmental effects are anticipated, including both adverse and beneficial effects.

The SEA did not forecast any significant residual adverse effects from Policy implementation. Any adverse effects that may arise are expected to be no more than minor and will only materialise when planning authorities publish LDPs or evaluate planning applications based on the Policy.

Once finalised, the revised Regional Strategic Planning Policy on R&LC E replaces the 'Renewable Energy' Policy, as contained in the SPPS, September 2015. Since the SPPS is intended to be read and applied as a unified document, it's preferable to integrate monitoring of the Policy revision within the current monitoring framework. Additionally, the Department will persist in generating and disseminating renewable energy statistics through quarterly and annual statistical publications, as well as within the annual planning monitoring framework.

The Department oversees the planning process, collaborating with councils as they develop new local policies through their Local Development Plans (LDPs). The SPPS incorporates a section on 'Implementation, Monitoring, and Review,' mandating local authorities to assess their plans' implementation annually and report to the Department on the extent to which the objectives outlined in the adopted LDPs have been met.

The regulations referred to in the ‘Implementation, Monitoring and Review’ section contain specific monitoring requirements. The Planning (Local Development Plan) Regulations (Northern Ireland) 2015 states in Regulation 25 that:

“(2) The annual monitoring report must specify... (c) the supply of land for economic development purposes in the council’s district, and (d) such other issues as appear to the council to be relevant to the implementation of the local development plan.

(3) Where a policy specified in a local development plan is not being implemented, the annual monitoring report must identify that policy and include a statement of- (a) the reasons why that policy is not being implemented, (b) the steps (if any) that the council intend to take to secure the implementation of it, and (c) whether the council intend to prepare a revision of the local development plan to replace or amend the policy.”

Councils reporting annually to the Department on the achievement of objectives outlined in adopted LDPs allows them to identify any unforeseen adverse environmental effects and take necessary corrective measures. This process also enables the Department to monitor the implementation of the SPPS.

If significant adverse effects arise from the Policy upon review, a monitoring program should be proposed in the form of a Monitoring Framework Document. This will facilitate the evaluation of policy impacts and the mitigation of adverse effects.

5.3 Recommended Monitoring Indicators

The measures proposed in monitoring framework relate specifically to the outcomes of the SEA and refer to the measures and indicators recommended to specifically monitor the accuracy of the predicted effects through the SEA. However, it is noted in some cases that the data required to monitor these effects does not currently exist. The monitoring framework is included in Table 5.1 below.

Table 5.1: Monitoring Framework

Policy Aim	Theme	Area	Linked Policy Objective/s	Output Indicators	Result Indicators
<p>Maximise sustainable renewable and low carbon energy from a wide range of technologies, at various scales, in appropriate locations within the built and natural environment, without compromising other environmental assets of acknowledged importance.</p>	<p>Energy Strategy & Climate Change Act Targets</p>	<p>Northern Ireland & Local Government</p>	<p>To ensure that sustainable renewable and low carbon energy development is facilitated at appropriate locations in order to increase the contribution to the transition to a net zero carbon economy;</p>	<p>Positive support for facilitating an increase in renewable energy development in order to help achieve Northern Ireland's renewable energy targets</p>	<p>Total renewable electricity generation by type annually (DfE).</p>
			<p>To secure the delivery of an appropriate mix of energy provision that supports the energy strategy where this benefits our environment, economy and communities;</p>		<p>Renewable and low carbon energy planning applications received and decided (approved/refused) annually (DfI Planning Stats)</p>
			<p>To facilitate the appropriate onshore development required to enable offshore renewable and low carbon energy proposals.</p>		<p>Number of LDPs subject to Independent Examination and found to be 'sound' and published.</p>

Policy Aim	Theme	Area	Linked Policy Objective/s	Output Indicators	Result Indicators
	Locational Considerations	Northern Ireland & Local Government	<p>To secure the delivery of an appropriate mix of energy provision that supports the energy strategy where this benefits our environment, economy and communities.</p> <p>To ensure that the environmental, landscape, visual, safety and amenity impacts associated with or arising from renewable and low carbon energy development are appropriately assessed and addressed;</p> <p>To ensure appropriate protection of the region's built, natural, and cultural heritage features;</p> <p>To facilitate the appropriate onshore development required to enable offshore renewable and low carbon energy proposals.</p>	Appropriate protection of the Region's landscape designations	<p>Number of renewable energy development planning applications refused/approved in AONB's annually.</p> <p>Location of approved wind energy applications by council planning authority annually (DfI Planning Statistics)</p>

Policy Aim	Theme	Area	Linked Policy Objective/s	Output Indicators	Result Indicators
	Residential Amenity	Northern Ireland & Local Government	To ensure that the environmental, landscape, visual, safety and amenity impacts associated with or arising from renewable and low carbon energy development are appropriately assessed and addressed;	Minimise impacts on residential amenity	Number of complaints to LGD Environmental Health Department's relating to renewable energy developments built and commissioned following planning consent.
					Number of planning enforcement cases opened annually relating to renewable energy developments built and commissioned following planning consent.
	Decommissioning & Site Restoration for New Development	Northern Ireland & Local Government	To ensure that the environmental, landscape, visual, safety and amenity impacts associated with or arising from renewable and low carbon energy development are appropriately assessed and addressed;	Minimise impacts on the landscape in the long term.	Renewable and low carbon energy planning applications received and decided annually (DfI Planning Stats)
					The number of future enforcement cases relating to decommissioning matters associated with approved developments.
Number of LDPs subject to Independent Examination and found to be 'sound' and published.					

Policy Aim	Theme	Area	Linked Policy Objective/s	Output Indicators	Result Indicators
	Life extension & Re-Powering of existing solar and wind farms	Northern Ireland & Local Government	<p>To ensure that sustainable renewable and low carbon energy development is facilitated at appropriate locations in order to increase the contribution to the transition to a net zero carbon economy;</p> <p>To secure the delivery of an appropriate mix of energy provision that supports the energy strategy where this benefits our environment, economy and communities.</p> <p>To ensure that the environmental, landscape, visual, safety and amenity impacts associated with or arising from renewable and low carbon energy development are appropriately assessed and addressed;</p> <p>To ensure appropriate protection of the region's built, natural, and cultural heritage features</p>	<p>Positive support for facilitating an increase in renewable energy development in order to help achieve Northern Ireland's renewable energy targets.</p> <p>Minimise impacts on the landscape in the long term.</p>	<p>Number of planning applications for life extension and/ or re-powering received, approved or refused annually.</p> <p>Number of LDPs subject to Independent Examination and found to be 'sound' and published.</p>

6 REFERENCES

Government of Northern Ireland (2004) The Environmental Assessment of Plans and Programmes Regulations (280/2004).

Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment.

WSP (2023) A Review of Noise Guidance for Onshore Wind Turbines: Project Report. 70081416-001-03-04. Revision 4.

Department of Trade and Industry (1996). ETSU-R-97, The Assessment and Rating of Noise from Wind Farms. ETSU/DTI Available at: <https://webarchive.nationalarchives.gov.uk/+http://www.berr.gov.uk/files/file20433.pdf>

APPENDIX A: SCOPING CONSULTATION RESPONSES

Comment ref.	Page of letter	Comment	Actions to address comment
Organisation and contact: DAERA			
Date received: 22/07/2022			
1	1	DAERA request that the SEA Environmental Report contains details of both the targets and indicators in relation to the objectives which have been listed for each of the ten sustainability topics.	Targets and indicators have been set out in Appendix D
2	1	A clear statement indicating the opinion about whether or not the implementation of the of the policy change is likely to have a significant effect on Northern Ireland, in combination with any identified measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment.	This is outlined within the Environmental Report (ER).
3	1	DAERA notes that alternatives are currently in the discussion stage these should also be detailed within the SEA Environmental Report.	Alternatives are detailed in the ER
Natural Environment Division Comments (Within DAERA Doc)			
4	2	NED note that there is limited information on the current status of peatland in Northern Ireland in relation to peatlands within the Biodiversity, flora and fauna section of the report. NED advise that depending on time lines the new Peatlands Strategy for Northern Ireland should be consulted as part of the SEA Environmental Report.	Baseline contains points on peatland in NI and Ireland and peatlands have been taken into account within the assessment.
5	2	NED are content with the overall approach to SEA and the issues that will be addressed including the consideration of how Environmental impacts will be addressed and mitigated.	Noted.

Comment ref.	Page of letter	Comment	Actions to address comment
6	2	We welcome that mitigation and monitoring will be put in place in due course and look forward to the opportunity to comment further as the process develops.	Noted.

APPENDIX B: STATUTORY CONSULTATION RESPONSES

Comment Ref.	Page of Letter	Document	Comment	Actions to Address comment
Organisation: DAERA Air and Environmental Quality (AEQ) Branch				
Date received: 11/05/2023				
1	1	SEA Non-Technical Summary, Page 9 - Air Quality: Strengths and Opportunities	<p>"In 2020 levels of Nitrogen Dioxide at ten sites did not breach the United Kingdom Air Quality Strategy annual target values; the annual mean concentration of particle matter did not breach the target values either."</p> <p>16 sites did not breach the United Kingdom Air Quality Strategy annual target values, but it is important to note that the pandemic may have had an impact on air quality due to a reduction in traffic. Should state particulate matter rather than particle matter.</p>	Air quality strengths and opportunities updated and amended.
2	1	SEA Non-Technical Summary, Page 9 - Air Quality: Strengths and Opportunities	WHO 2021 guidelines could also be considered.	Air quality section updated with information on compliance against WHO 2021 guidelines.
3	1	SEA Non-Technical Summary, Page 9 - Air Quality: Weaknesses and Threats	<p>"There is a lack of a downward trend in the most widely exceeded pollutant Nitrogen Dioxide, which has remained generally level since the late nineties."</p> <p>To note a study carried out as part of the Air Pollution in NI 2020 report demonstrated that eight sites showed a decreasing trend in NO2 from 2011 to 2020, statistically significant at the 0.001 level. Belfast Stockman's Lane and Belfast Ormeau Road both show an average</p>	Air quality weaknesses and threats amended.

Comment Ref.	Page of Letter	Document	Comment	Actions to Address comment
			reduction in NO2 greater than 2 µg m-3 per year over the period analysed.	
4	1	SEA Non-Technical Summary, Page 9 - Air Quality: Weaknesses and Threats	<p>“Benzo[a]pyrene has been monitored at three different sites and while all sites met the target values, two of the three sites continue to exceed air quality objectives.”</p> <p>It is important to note that NI has still not brought in any restrictions on domestic burning of coal or solid fuels for heating. RoI and the rest of the UK have implemented such restrictions already. There is a commitment from DfE in the Energy Strategy to phase out coal and certain solid fuels.</p>	Lack of restrictions on domestic burning of coal and solid fuels for heating included under Air quality weaknesses and threats.
5	1	SEA Non-Technical Summary, Page 10 - Climate Change	<p>To note that some climate actions which reduce GHGs can also reduce air pollutants but there are also measures which reduce GHGs that can increase certain air pollutants. Please see report and related summary at this link (below) for further information on these synergies https://royalsociety.org/topics-policy/projects/air-quality-climate-change/</p>	Air quality weaknesses and threats updated.
6	2	SEA Non-Technical Summary, Page 16 - Wind Turbines	<p>Please see this report (link below) and its recommendations. https://www.wsp.com/en-gb/insights/wind-turbine-noise-report</p>	The alternative assessment for Policy Theme 4a updated in light of the results of the WSP study.
Organisation: DAERA Northern Ireland Environment Agency				
Date received: 29/05/2023				
19	1	SEA Environmental Report	The layout and content of the Environmental Report (ER) 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.

Comment Ref.	Page of Letter	Document	Comment	Actions to Address comment
20	1	SEA Environmental Report	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.	Noted.
21	2	SEA Environmental Report	DAERA Natural Environment Division (NED) Comments NED are content with the approach to the SEA and that the issues have been identified and addressed. NED are content that our comments and recommendations at the scoping stage have been addressed and incorporated into both the environmental report and the SPPS policy.	Noted.
22	2	SEA Environmental Report, Section 7	We welcome the mitigation and recommendations at a number of levels i.e. embedded mitigation, where environmental protection is embedded within the text of the policy, which includes the enhancements contained within the NED response to the scoping report (see p 100 of the ER for details). NED notes that the mitigation section details the environmental protections contained within the planning system, namely the requirement for environmental assessment during the Local Development Plan (LDP) process and the need for Environmental Impact Assessment (EIA) and other environmental assessment when applying for planning permission. NED is content the modification to the SPPS and the aforementioned processes and assessment requirements should adequately provide environmental protections.	Noted.
23	2	SEA Environmental Report, Section 2.7	The ER states that the modification to SPPS was screened out of a Habitats Regulations Assessment (HRA). Although NED were consulted on the Stage 1 screening for the HRA it appears NED were not re-consulted with the finalised report determining that HRA was screened out. NED had concerns regarding the summary section of the HRA, which states that Paragraphs 4.40 and 5.9 of the SPPS are to remain unchanged. However, within the “Provide details of any other projects or plans that together with the project or plan being assessed could (directly or indirectly) affect the site” section it is stated that “Paragraphs	The Department has engaged with DAERA on their response and subsequently Shared Environmental Services (SES) who will undertake an AA of the final policy on the Department's behalf to ensure that the

Comment Ref.	Page of Letter	Document	Comment	Actions to Address comment
			4.40 and 5.9 of the SPPS are expected to remain unchanged". NED advise that the HRA must be completed on the basis of clear conclusions and cannot contain contradictions or suppositions.	policy review is in compliance with HRA regulations.
24	2	SEA Environmental Report, Section 2.7	NED also advised that further HRA assessment may be required if a plan or project is not directly connected with or necessary to the management of any N2K site, contrary to the conclusions of the submitted HRA Stage 1 screening. The ER states at section 2.7.2, p16, that 'Comments received have been considered and reflected, where appropriate, in version 3 of the stage 1 assessment' NED have not had sight of version 3 of the stage 1 assessment and would advise that NED should be reconsulted on changes made, particularly in relation to the comments above and the finalised conclusions.	The Department has engaged with DAERA on their response and subsequently Shared Environmental Services (SES) who will undertake an AA of the final policy on the Department's behalf to ensure that the policy review is in compliance with HRA regulations.
25	2 & 3	SEA Environmental Report, Section 5	In the consideration of alternatives, option 3 of policy Theme 1 has been chosen, despite the fact that the ER states there are risks for adverse effects on historic environment, landscape and ecology and nature conservation. The ER states that this option will have major beneficial effects for climate and that any harmful effects on other objectives will be considered with the mitigation options discussed above. Option 4, which has the same considerations as option 3, includes additional protection for peatlands, and has been scored as having the same effects as option 3. NED would disagree with the scoring for option 4 as it is likely to have a positive or neutral effect on ecology if mandatory assessment of peatland carbon or greenhouse gas emissions is required. Peatlands act as stores and sinks for carbon and are important habitats containing protected and priority species and habitats. Option 4 would therefore have a stronger positive effect than option 3 by preventing loss of carbon from peat and preventing damage to sensitive habitats. There are a number of policies and protections in place to protect, enhance and restore peatlands and reverse biodiversity decline, for example Nature Positive 2030, UKCCC 6th Carbon Budget report and the Northern Ireland Peatland Strategy 2021-2045. Development on peatland locations can release greenhouse gasses through disturbance of the peat substrate, reduction in or obstruction of the water table and	Assessment updated in response to NED comments

Comment Ref.	Page of Letter	Document	Comment	Actions to Address comment
			<p>have negative effects on the ecology of the site, all of which goes against the objective of reducing greenhouse gas emissions and preserving biodiversity.</p>	
26	3	SEA Environmental Report, Section 5	<p>Option 4 was rejected as it 'may increase development pressures and aggregation on non-peatland locations' (5.4.1, p 53). The phrase 'non-peatland locations' implies all other land use within Northern Ireland. Non-agricultural land tends not to be productive or easily accessible, both of which are rare in the NI landscape and consequently are more likely to support rare and threatened habitats/species. These natural heritage constraints make it more challenging for renewables developers to progress successfully through planning with the proposed scale and location of the scheme. Rejection of option 4 would put pressure on peatland locations with the subsequent implications stated above. Although, 6.5.13, p 94, does state that 'The revised Policy states the importance of both active and degraded peatlands, affirming that their protection and restoration potential can, therefore, be a material consideration in the determination of planning applications on a case by case basis'. NED would consider that greater protections should be embedded within the policy and that mitigation should not solely rely on the planning system for these protections. NED considers that further information is required to explain the rejection of option 4 and the conclusions of the scoring exercise.</p>	Assessment updated in response to NED comments
27	3	SEA Environmental Report, Section 2, Table 2.2	<p>SEA Objective 4 Soil and Land Use (p 11) sub-objective c. 'Encourage local production of fuel' NED would consider the word 'fuel' to imply a fossil fuel such as peat extraction, rather than a renewable energy, as traditional renewable energy technologies do not rely on a fuel as such. As stated at 3.1.7 on p 17 'A main principle of new Energy Strategy is to replace key fossil fuels with renewable energy and become more self-sufficient' Additionally in Appendix B it states that 'The Strategies policy framework includes 'Replacing Fossil Fuels with Renewable Energy' and others relating to reducing GHG emissions to zero and decarbonisation'. NED considers that the word 'fuel' in objective 4 should be changed to either 'energy' or 'electricity' to avoid confusion. Alternatively, if the objective is referring to the local production of wood</p>	Wording amended for clarity in objective 4 sub-objective c.

Comment Ref.	Page of Letter	Document	Comment	Actions to Address comment
			fuel, which is less carbon intensive than fossil fuels, then the wording in the objective should be altered for clarity.	
28	3	SEA Environmental Report, Appendix D	Appendix D lists the SEA Objectives, Sub-Objectives, Indicators and Targets. NED would consider that the targets are not sufficient. All the targets are vague and simply state the potential of the SEA objectives rather than a specific target that should be achieved as an outcome of the revision to the SPPS policy on Renewable Energy. While objectives for an SEA specify a desired direction for change, they often form a hierarchy which goes from a general statement to a more detailed target. NED requires that the targets should be revised to be more specific regarding the outcomes from the SEA process.	The targets have been removed due to SEA objectives are an adequate basis for assessment.
29	4	SEA Environmental Report, Section 7.4	On p 101, paragraph 7.4.4 states 'All re-powering should be subject to the requirement for planning permission' NED requires that the word 'should' be changed to 'must' to ensure that re-powering is subject the environmental protections within the planning system. The potential for likely significant impacts to natural heritage features must be considered under the policy framework and relevant regulations governing renewables development at that time in the future.	Wording amended to 'must' as opposed to 'should' in Section 7.4.
30	4	SEA Environmental Report, Section 8	<p>The Monitoring section of the ER highlights the monitoring already incorporated into the existing monitoring framework for SPPS and states that the Department for Infrastructure will continue to publish renewable energy statistics for the planning system. Additionally, they will carry out an oversight role. Councils are also engaged as they prepare their new local policy through the LDP process. This includes a requirement for local authorities to review the implementation of their plans and report annually to the Department on the extent to which the objectives set out within an adopted LDP have been met. Paragraph 8.1.8 then states that a monitoring programme should be set up if it is found that significant adverse effects are arising as a result of the policy in the form of a 'Monitoring Framework Document'. There is no further detail included regarding this further monitoring programme.</p> <p>It is the opinion of NED that all monitoring should be included within the ER. Additional monitoring of significant effects may not be appropriate</p>	Departments to consider when developing monitoring frameworks.

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			as they should be addressed rather than monitored. This section of the SEA should provide details as to how adverse effects are to be dealt with and by whom. Any potential effects should then be incorporated into the mitigation section of the SEA. While we note that unforeseen issues may arise the ER should aim to identify as best as possible any significant effects and put in place measures to address these. The ER may also wish to consider what will be done should unforeseen effects arise and rather than monitor these it may be best to include mitigation such as withdrawal or pausing of the policy to ensure no further adverse effects.	
31	4	SEA Environmental Report, page 36	On page 36 of the ER in the final point Department of Agriculture and Rural Development (DARD) should be changed to Department of Agriculture Environment and Rural Affairs (DAERA), as DARD no longer exists. The reference to DARD should also be removed from the table of abbreviations on page 3.	Reference to the department amended and DARD removed from abbreviations.
32	4	SEA Environmental Report, Appendix A	Landscape Team Comments The figures provided in Appendix A have omitted the Giant's Causeway and Causeway Coast World Heritage Site, this is an important protected landscape designation and its location should be represented on a figure.	World Heritage Site added to Figure 8 in Appendix B
34	5	SEA Environmental Report, Appendix B	Relevant marine policy and legislation has been included in Appendix B which reviews other plans, programmes and environmental protection objectives.	Noted.
35	5	SEA Environmental Report, Section 2	The MPT are also content with the assessment methodology.	Noted.
36	5	SEA Environmental	It is noted the SEA assessment will have regard to marine and coastal environments (para 2.4.3). The MPT particularly welcome the SEA Objectives and Sub-Objectives, set out in Table 2.2, which indicate	Noted.

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		Report, Section 2	impacts on the marine environment have been considered as part of the environmental assessment.	
37	5	SEA Environmental Report, Section 4.3	However, the Summary of Baseline Data and the Assessments appear to concentrate on WFD status, in relation to the Water topic. It is advised the baseline would have benefited from a description of marine and coastal waters in terms of the UK Marine Strategy and the status of these waters in terms of good environmental status.	Baseline water section updated with information on marine and coastal waters.
38	5	SEA Environmental Report, Sections 5 and 6	The assessments could have made explicit reference to the likely impact on environmental status from the various alternatives, the selected alternative and policy themes presented.	The SEA considers the impact of the policy on the SEA objectives. It would be difficult to accurately assess how each alternative would affect the good environmental status (GES) of marine waters as these are based on 11 descriptors and would require detailed assessment beyond the scope of the SEA.
39	5	SEA Environmental Report, Section 4.3	Similarly, the Landscape topic would have benefited from a reference to the Regional Seascape Character Assessment 2014 which identifies 24 distinct Seascape Character Areas around the Northern Ireland coastline, with the Summary of Baseline Data. A reference to regional seascape areas is provided in Table 6.4 under the SEA Landscape topic, description of effect, in relation to adverse visual impacts in marine and coastal areas and in paragraph 6.5.31	Reference to regional seascape areas added to the summary of baseline data.
40	6	SEA Environmental Report, Section 4.3	Marine Historic and Environment Pg 39: Under Cultural Heritage - Strengths and Opportunities • Change – “340 ship wrecks and 8 aircraft wrecks are currently recorded within NI waters (DFC 2020); 2 of the shipwrecks have statutory protection; La Girona under the Protection of Wrecks Act 1973, and HMS Drake under the Historic Monuments and Archaeological	Cultural heritage - strengths and opportunities updated.

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			<p>Objects (NI) Order 1995.” To (as this has been updated recently) • “372 ship wrecks and 10 aircraft wrecks are currently recorded within NI waters (DFC 2023); 4 of the shipwrecks have statutory protection; La Girona under the Protection of Wrecks Act 1973, and HMS Drake, Lochgarry and Devereux under the Historic Monuments and Archaeological Objects (NI) Order 1995, 8 of the aircraft are protected under the Protection of Military Remains Act 1986”</p>	
41	6	SEA Environmental Report, Section 4.3	<p>Pg 40: The currently listed weaknesses and threats are not relevant to this policy; would suggest changing to:</p> <ul style="list-style-type: none"> • Coastal erosion and rising sea levels are an increasing threat to coastal heritage. • While terrestrial heritage assets are well recorded on the Historic Environment Record of Northern Ireland the lack of detailed seabed heritage surveys means that only a small percentage of historically recorded wrecks are precisely located. There is therefore an increased risk of intertidal and offshore renewable energy developments encountering previously un-identified shipwrecks and aircraft wrecks, some of which may have national significance. • Potential for increased flood risk to heritage assets and required adaptation measures to mitigate risks. • Increase in Heritage at Risk additions, due to vacancy, and neglect. • Demolition of existing buildings, inc. historic buildings and consequential carbon costs and loss of local character distinctiveness. 	Cultural heritage weaknesses and threats updated
42	6 & 7	SEA Environmental Report, Section 4.3	<p>And in line with the points raised on pg 76:</p> <ul style="list-style-type: none"> • Adverse effects arising from an overall increase in renewable energy developments (including offshore & onshore windfarm developments, repowering of windfarms with taller turbines and associated infrastructure construction; such as access routes, grid connections and substations) may include loss or damage to cultural heritage assets (both designated and un-designated) and Potential negative visual impact on the setting of significant heritage assets; including Scheduled Monuments, Listed Buildings, State Care Monuments, Areas of 	Cultural heritage weaknesses and threats updated

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			Significant Archaeological Interest, Areas of Archaeological Potential and Conservation Areas.	
43	7	SEA Environmental Report, Section 4.3	<p>P43: Key Environmental and Sustainability Issues:</p> <ul style="list-style-type: none"> • There has been an amalgamation of historic environment and landscape issues, while their interests may be intertwined these should be separated out and specific “Cultural Heritage” section included (this would align with the heading “Cultural Heritage” on pg 39. • As a general comment “Cultural Heritage” and “Historic Environment” have been interchanged throughout the document, it is suggested that either one or other term is used throughout. 	Cultural heritage key issues separated from landscape and updated
44	7	SEA Environmental Report, Section 6, Table 6.4	<p>Pg 78. POLICY THEME 2 – LOCATIONAL CONSIDERATIONS - SEA objective 9 Historic Environment</p> <ul style="list-style-type: none"> • The wording “A presumption in favour of such development will apply in identified areas. Where mapping for the most appropriate areas for R&LC E development does not take into account built and natural cultural heritage, archaeology and the site and setting of heritage assets. Loss, damage and disturbance of historic assets may occur.” The term “may” should be strengthened as given the statement that “R&LC E Development does not take into account built and natural cultural heritage, archaeology and setting of heritage assets” then negative impact on some cultural heritage assets is almost inevitable. • Under Significance: The significance for historic environment should be changed to Moderate, as this option will remove some of the protections for heritage. Moderate/Minor is not considered to be a reasonable assessment of the significance of this proposal. 	The assessment has been updated to take into account this comment. In addition, the Policy worded has been amended to remove ‘presumption in favour’.
45	7	SEA Environmental Report, Section 6.4, Table 6.4	<p>Pg 82. POLICY THEME 8 - RE-POWERING EXISTING WIND and solar FARMS - SEA objective 9 Historic Environment:</p> <ul style="list-style-type: none"> • Under Significance: The significance for historic environment should be changed to Moderate/Minor, as this option will most likely remove 	The Policy has been reworded to remove the presumption in favour of proposals and more weight given to making impacts acceptable. With the change

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			most of the protections for heritage. Minor is not considered to be a reasonable assessment of the significance of this proposal	in policy, minor is considered to be a reasonable assessment.
46	7	SEA Environmental Report, Section 6.4	<p>Pg 90. Policy Theme 2 – Locational Considerations</p> <ul style="list-style-type: none"> • 6.4.20 The historic environment adverse impact should be reconsidered in light of our comments above 	Assessment has been reconsidered
47	7 & 8	SEA Environmental Report, Section 6.4	<p>Pg 90 Policy Theme 8 - Re-Powering Existing Wind and Solar Farm</p> <ul style="list-style-type: none"> • 6.4.24 The historic environment adverse impact should be reconsidered in light of our comments above 	Assessment has been reconsidered
48	8	SEA Environmental Report, Section 6.5	<p>Pg 95 Historic Environment</p> <ul style="list-style-type: none"> • Should be reviewed in light of light of our comments above. 	Assessment has been reconsidered
49	8	SEA Environmental Report, Section 7.3	<p>Pg 100 7.3 Environmental Enhancements</p> <ul style="list-style-type: none"> • “biodiversity, nature conservation, archaeological or built heritage interests;” should be changed to “biodiversity, nature conservation and Historic Environment interests;” (p.43 comment relates) • There is no significant difference between “archaeological” and “built heritage”, archaeology is an element of built heritage. For full clarity it is recommended that there is a glossary of terms added to this document which includes a full definition of Historic Environment, Cultural Heritage and Designated and Undesignated heritage assets – see glossary at end of : https://www.communitiesni.gov.uk/sites/default/files/publications/communities/dfc-conversation-principlesguidance-sustainable-management.pdf 	Wording updated and a glossary added.

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53	9	SEA Environmental Report, Section 2.3, Table 2.2	<p>Table 2.2 SEA Sub-Objectives</p> <ul style="list-style-type: none"> • Under Section 1. Ecology and Nature conservation we recommend including ASSIs along with the other designated sites. 	ASSIs added to the sub-objective.
54	9	SEA Environmental Report, Section 2.3, Table 2.2	<p>Table 2.2 SEA Sub-Objectives</p> <ul style="list-style-type: none"> • Welcome the inclusion of marine cultural heritage under Section 9. Cultural Heritage and reference to preserving, conserving, and enhancing carbon sequestration and flood resilience under Section 11. Natural Capital and inter-relationships. 	Noted.
55	9	SEA Environmental Report, Section 4.3	<p>Summary of baseline data – Ecology and Nature Conservation</p> <p>The document incorrectly states that ‘DAERA Marine and Fisheries Division has designated four new MCZs in the NI inshore regions, with another in progress, in addition to the existing MCZ Strangford Lough.’ DAERA MFD designated four MCZs in 2016 while Strangford Lough became an MCZ on the enactment of the Marine Act (Northern Ireland) in 2013. Therefore, in the NI inshore region, there are five MCZs:</p> <ul style="list-style-type: none"> • Strangford Lough MCZ, • Rathlin MCZ, • Waterfoot MCZ, • Outer Belfast Lough MCZ, and • Carlingford Lough MCZ. 	Correction made to the ecology and nature conservation section in Section 4.3.
56	9	SEA Environmental Report, Section 4.3	<p>Landscape</p> <ul style="list-style-type: none"> • Reference to the NI Regional Seascape Character Areas should be included here https://www.daera-ni.gov.uk/publications/northern-ireland-regional-seascape-character-assessment 	Reference to NI regional character areas Included in the landscape section of Section 4.3.
57	9	SEA Environmental	Policy Theme 1 – Regional Strategic Planning Policy and Energy Targets	Impacts on seascape character areas added.

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		Report, Section 6.4	<ul style="list-style-type: none"> Section 6.4.7 refers to moderate adverse effects on landscape due to potential for visual impacts. We suggest the impacts on the seascape are also considered here, as structures on cliffs near the coastline may have an adverse impact on the seascape character area. 	
58	9 & 10	SEA Environmental Report, Section 6.5	<p>Policy Theme 1 – Regional Strategic Planning Policy and Energy Targets</p> <ul style="list-style-type: none"> Section 6.5.15 refers to potential development within coastal areas having adverse impacts on coastal and marine habitats and species. Impacts to coastal processes should also be considered as the presence of hard engineering within coastal/marine environments may alter water flow affecting protected sites, as well as exacerbating coastal erosion in nearby areas. 	Impacts to coastal processes added to cumulative effects assessment in Section 6.5.
55	9	SEA Environmental Report, Section 4.3	<p>Summary of baseline data – Ecology and Nature Conservation</p> <p>The document incorrectly states that ‘DAERA Marine and Fisheries Division has designated four new MCZs in the NI inshore regions, with another in progress, in addition to the existing MCZ Strangford Lough.’ DAERA MFD designated four MCZs in 2016 while Strangford Lough became an MCZ on the enactment of the Marine Act (Northern Ireland) in 2013. Therefore, in the NI inshore region, there are five MCZs:</p> <ul style="list-style-type: none"> Strangford Lough MCZ, Rathlin MCZ, Waterfoot MCZ, Outer Belfast Lough MCZ, and Carlingford Lough MCZ. 	Correction made to the ecology and nature conservation section in Section 4.3.
56	9	SEA Environmental Report, Section 4.3	<p>Landscape</p> <ul style="list-style-type: none"> Reference to the NI Regional Seascape Character Areas should be included here https://www.daera-ni.gov.uk/publications/northern-ireland-regional-seascape-character-assessment 	Reference to NI regional character areas included in the landscape section of Section 4.3.

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57	9	SEA Environmental Report, Section 6.4	<p>Policy Theme 1 – Regional Strategic Planning Policy and Energy Targets</p> <ul style="list-style-type: none"> Section 6.4.7 refers to moderate adverse effects on landscape due to potential for visual impacts. We suggest the impacts on the seascape are also considered here, as structures on cliffs near the coastline may have an adverse impact on the seascape character area. 	Impacts on seascape character areas added.
58	9 & 10	SEA Environmental Report, Section 6.5	<p>Policy Theme 1 – Regional Strategic Planning Policy and Energy Targets</p> <ul style="list-style-type: none"> Section 6.5.15 refers to potential development within coastal areas having adverse impacts on coastal and marine habitats and species. Impacts to coastal processes should also be considered as the presence of hard engineering within coastal/marine environments may alter water flow affecting protected sites, as well as exacerbating coastal erosion in nearby areas. 	Impacts to coastal processes added to cumulative effects assessment in Section 6.5.
Organisation: Department for Communities Historic Environment Division				
Date received: 29/05/2023				
59	1	SEA Environmental Report	HED welcomes where comments provided as part of the scoping consultation response dated July 2022, have been taken into account as outlined in Appendix C.	Noted.
60	1	SEA Environmental Report, Section 4.3	<p>Cultural Heritage (p.39)</p> <p>A key asset not mentioned in the statistics put forward with particular relevance to renewable energy considerations are Areas of Significant Archaeological Interest, which are sizeable areas of landscape designated through local development plans. Several of these are in expansive upland areas and some take in considerable areas of historic landscape character.</p>	Cultural heritage section updated.

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61	1	SEA Environmental Report, Section 4.3	Cultural Heritage (p.39) We'd also advise that not all historic parks, gardens and demesnes are manorial estates, some have historically been public assets, such as The Mall in Armagh or smaller ventures, such as the Battle Garden at Kilwarlin, Co. Down.	Text under cultural heritage section amended.
62	2	SEA Environmental Report, Section 4.3	4.3.3 Weaknesses & Threats (p.40) We suggest including: <ul style="list-style-type: none"> • Potential for climate change effects to increase flood risk, erosion risk and drought risk to certain heritage assets, requiring monitoring and adaptation, and recording measures to mitigate risks. • Demolition of existing buildings, inc. listed and historic buildings and consequential carbon costs and loss of local character distinctiveness. 	Suggestions included in Section 4.3.
63	2	SEA Environmental Report, Section 4.3	4.3.3 Weaknesses & Threats (p.40) We suggest including: HED would welcome consideration of the transboundary relevance of cultural heritage in the report. Several heritage assets, including canals, railways and prehistoric earthworks are transboundary features, while other assets share landscape and contextual relationships with assets either side of the border. Impacts on the setting and context of heritage assets on either side of the border have the potential to arise through renewable energy development.	Section on transboundary cultural heritage considerations added to Section 4.3.
64	2	SEA Environmental Report, Section 4.4	4.4.1 Historic Environment (p.43) Though NI has no National Parks, it would be appropriate to acknowledge the new Mourne, Strangford Gullion UNESCO Global Geopark and Marble Arch Caves Global Geopark.	Geopark added to Section 4.3
65	2	SEA Environmental Report, Section 5.3, Table 5.1	Policy Theme 3 – Siting new Farms in Perpetuity (p.50) HED considers Option 2 presents an uncertain rather than neutral effect, as this option could limit review of inappropriate decision making and curtail capacity for change and reversal of negative impacts of a wind farm on the natural and historic environment. It also fails to provide flexibility for technological advances with regard to renewable energy	Assessments are predominantly a matter of professional judgement, while we value the comment and have considered the assessment in light of the

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			generation, which may in the future, see a reduction in wind farms in favour of alternative energy sources.	comment, on balance we believe the assessment to be valid.
66	2	SEA Environmental Report, Section 5.4	5.4.3 Policy Theme 3 - Siting New Wind Farms in Perpetuity (p.53) Above comments relate.	See above
67	2	SEA Environmental Report, Section 5.4	5.4.10 Policy Theme 5 - Decommissioning and Site Restoration for New Development (p.54) While strengthening of this policy theme has the potential to rectify impacts of R&LCE applications on the natural and historic environment, policy Themes 3 & 8, suggests site restoration of R&LCE sites may not be effectively implemented, due to the policy approach which supports a presumption in favour of re-powering, expanding and extending the life of existing solar and wind farms.	Noted.
68	2	SEA Environmental Report, Section 6.1, Table 6.2	Table 6.2: High Level Matrix Assessment of Selected Strategic Alternative (p.61-68): Policy Theme 2 b – The use of the word ...'valued' designated landscapes' implies that the policy direction for large scale developments to avoid these areas, will not apply to all landscape designations. Some designations will have more significance than others, though a designation is a recognition of its importance/value. In the context of the historic environment, clarity is sought whether ASAI's, regionally important areas of distinctive historic landscape character, are included as 'valued' landscapes given their absence from policy wording in the draft 1.11. In the absence of this clarity and consistent regional criteria for identifying suitable spatial areas through the LDP process (as noted in para 6.3.5), we consider the policy to have a likely adverse effect on historic environment objectives.	Where such landscapes are of designated significant value a cautious approach will apply. See RLE 12. The policy does not provide a definitive list of designations but gives some examples. The Department considers that the final policy provides an appropriate approach. This policy must be read and applied together other provisions within the policy (such as RLE 10) and also in terms of the SPPS as a whole, including the subject policy "Archaeology and Built Heritage'. Also it should be

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				noted that the Department does not intend to pursue the proposed spatial approach.
69	2	SEA Environmental Report, Section 6.1, Table 6.3	Table 6.2: High Level Matrix Assessment of Selected Strategic Alternative (p.61-68): Policy Theme 3 - Policy refers to 'areas identified as appropriate for wind farms are expected to be suitable for use in perpetuity', though it is not clear if the policy intent relates to spatial areas identified through the LDP process informed by robust assessment of evidence bases, or areas identified through the planning process, for both new and extant permissions. As per comments above (see p.50) and in the absence of further clarity, HED considers this policy change may have adverse effects on the historic environment, curtailing opportunities to rectify negative impacts of previous decision making.	Assessments are predominantly a matter of professional judgement, while we value the comment and have considered the assessment in light of the comment, on balance we believe the assessment to be valid.
70	3	SEA Environmental Report, Section 6.1, Table 6.4	Table 6.2: High Level Matrix Assessment of Selected Strategic Alternative (p.61-68): Policy Theme 6 The policy approach to support large scale rooftop solar power applications could introduce potential adverse effects on historic townscape/ village character and appearance, particularly in Conservation Areas, ATCs and within the setting of listed buildings. While the policy text outlines '...schemes which will have a negative impact on the landscape should not be supported.' there is no reference to historic environment considerations. HED therefore disagree with a neutral scoring.	Assessments are predominantly a matter of professional judgement, while we value the comment and have considered the assessment in light of the comment, on balance we believe the assessment to be valid.
71	3	SEA Environmental Report, Section 6.1, Table 6.5	Table 6.2: High Level Matrix Assessment of Selected Strategic Alternative (p.61-68): Additional Policy Text (APT) Note: wording under (f) does not align with revised wording of the draft policy, which provides new text to include for consideration of cumulative effects and the additional term 'archaeological' under bullet point 3, as per para 1.12 of the policy draft.	Wording updated

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72	3	SEA Environmental Report, Section 6.3	6.3.9 HED considers this PT3 should have been subject to detailed consideration, for the issues identified above.	See above
73	3	SEA Environmental Report, Section 6.4	6.3.19 HED also considers the PT6 should be subject to detailed consideration to fully take into account potential for impacts on the historic environment.	See above
74	3	SEA Environmental Report, Section 6.4	Policy Theme 1 - Regional Strategic Planning Policy & Energy Targets 6.4.5 Hedgerows, trees, historic planting, and laneways/ routeways, in addition to being a habitat for biodiversity, can also inform and contribute to the historic landscape character and narrative of a place. The acknowledged potential for negative impacts on ecology, should therefore also apply to historic environment considerations and their intrinsic relationship should be acknowledged.	Potential for adverse effects on habitats to also contribute to adverse effects on cultural heritage acknowledged.
75	3	SEA Environmental Report, Section 6.4	Policy Theme 1 - Regional Strategic Planning Policy & Energy Targets 6.4.8 "Favourable consideration should be given to large scale rooftop solar power where there are no unacceptable impacts, including glint and glare." As noted under Policy Theme 6, Table 6.2, this policy text has the potential to adversely impact the setting of heritage assets such as listed and historic buildings within an historic townscape setting, particularly in regard to cumulative effects.	Noted.
76	3	SEA Environmental Report, Section 6.4	Policy Theme 1 - Regional Strategic Planning Policy & Energy Targets 6.4.10 As previously noted, in the absence of a consistent regional criteria for assessment of areas suitable for R&LC technologies and anticipated increase in R&LCE development proposals, HED considers the significance scoring should be revised to moderate.	Assessment has been reconsidered
77	3	SEA Environmental	Policy Theme 2 – Locational Considerations 6.4.15 We agree that the impact of locational policies remains uncertain. The potential for negative effects on cultural heritage could arise, if	Noted.

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		Report, Section 6.4	historic environment evidence bases are not appropriately utilised to inform identified areas. The application of inconsistent criteria across the Councils for identifying suitable R&LCE areas within LDP's, could also raise potential for negative effects. Appropriate mitigation could include developing/ updating regional guidance to ensure a consistent approach is adopted across all councils.	
78	3	SEA Environmental Report, Section 6.4	Policy Theme 2 – Locational Considerations 6.4.17 Potential effects on listed and non-listed heritage assets should also be taken into account.	Added
79	3	SEA Environmental Report, Section 6.5	Policy Theme 2 – Locational Considerations 6.4.20 In the absence of robust regional criteria for identifying areas suitable areas for R&LCE development through the LDP process, HED considers the significance scoring should be upgraded to moderate.	Assessment has been reconsidered
80	3	SEA Environmental Report, Section 6.5	Cumulative Effects 6.5.26 HED considers the policy may have scope for adverse impacts on the historic environment should monitoring of enacted, granted permissions and live planning applications, be insufficient to fully consider the potential for cumulative effects on heritage assets.	Added
81	3	SEA Environmental Report, Section 6.5	Cumulative Effects 6.5.29 It will be critical that historic environment evidence bases are fully utilised to form a robust assessment of individual and cumulative effects in decision-making.	Noted.
82	4	SEA Environmental Report, Section 7.3	7.3 Environmental Enhancements 7.3.2 Additional text to include for consideration of cumulative effects and the addition of 'archaeological' in the third bullet point is welcomed toward more robust assessment of historic environment impacts particularly for below ground works.	Noted.

APPENDIX C: NON-STATUTORY CONSULTATION RESPONSES

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Organisation: RSPB Northern Ireland				
Date received: 29/05/2023				
133	16	SEA Environmental Report	RSPB NI's concerns outlined above regarding the lack of an integrated and joined-up approach to tackling the nature and climate emergency within the context of this policy review is further amplified in the Strategic Environmental Assessment which accompanies the policy consultation.	Noted.
134	16	SEA Environmental Report, Section 6.1, Tables 6.2 and Section 6.4, Table 6.4	In this regard both Table 6.2: High Level Matrix Assessment of Selected Strategic Alternative, and Table 6.4: Detailed Matrix Assessment collectively serve to highlight the scale of potential ecology and nature conservation impacts of the revised policy, with only two elements from 24 in Table 6.2 actually recording a likely beneficial effect (of which one is recorded as questionable). The remainder range from 2 adverse, 10 uncertain and 10 neutral. In the context of both a nature and climate emergency, this is wholly unacceptable.	Noted.
135	16 & 17	SEA Environmental Report, Section 6.4, Table 6.4	Similarly, when Table 6.4 is further examined, with regards to ecology and nature conservation, the metrics again show a moderate level of effect on ecology and nature conservation over the greatest possible scale of impacts with medium certainty, this again is most concerning and unacceptable in the context presented above in this response. The ecology and nature conservation objective consistency fares worse in all the themes presented in Table 6.4.	Noted.
136	17	SEA Environmental	While the SEA Directive (Annex 1 (g) requires the setting out of 'measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the	The Department has considered this and similar comments on the draft

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		Report, Section 6.4	plan or programme' is considered that the embedded mitigation as set out at Section 7.2 of the SEA is insufficiently robust in this regard. We have set out above the concerns we have with the policy wording which is designed to be ecology and nature conservation mitigation at paragraphs 1.12, 1.15, 1.26 with regards to its vagueness and inability to prevent potential unintended negative consequences where nature and climate are to be traded off against one another. This requires to be addressed with utmost urgency, given the scale of nature emergency.	policy. The final policy has been amended, where appropriate and it is considered that improvements have been made in this regard and that the policy provides the appropriate balance between facilitating the necessary increase in appropriate renewable and low carbon energy developments where proposals will not result in unacceptable adverse impacts. See comparison table, and in particular, revisions as per RLE 7, RLE 8 RLE 10, RLE 12 and RLE 24. It is also important to rehearse that the new policy must be read and applied together with the policies in the SPPS overall, including those in relation to Natural Heritage. Happy to discuss further, if required.
137	17	SEA Environmental Report, Section 7.3	Similarly, the environmental enhancements outlined at Section 7.3, while although welcome, are however insufficient to satisfactorily mitigate the ecology and nature conservation impacts outlined in Tables 6.2 and 6.4. Again, please refer to our response above which outlines the concerns we have with paragraphs 1.12 and 17 in their current form.	See above.

APPENDIX D: OVERVIEW OF KEY CHANGES TO REGIONAL STRATEGIC PLANNING POLICY ON RENEWABLE AND LOW CARBON ENERGY

(i) SPPS (2015)	(ii) Public Consultation Draft Revised Policy (2023)	(iii) SPPS, Edition 2 (2025)
<p>The SPPS reflected and updated, in a strategic way the provisions of Planning Policy Statement 18 (published April 2009). The general thrust of the aim and objectives set out in PPS 18 were, therefore, brought forward into the SPPS (pages 90-93), as summarised below:</p> <p>The aim of the SPPS in relation to renewable energy was to facilitate the siting of renewable energy generating facilities in appropriate locations within the built and natural environment in order to achieve Northern Ireland's renewable energy targets and to realise the benefits of renewable energy without compromising other environmental assets of acknowledged importance.</p> <p>The Regional Strategic Objectives were to:</p> <ul style="list-style-type: none"> ensure that the environmental, landscape, visual and amenity impacts associated with or arising from renewable energy development are adequately addressed; ensure adequate protection of the region's built, natural, and cultural heritage features; and facilitate the integration of renewable energy technology into the design, siting and layout of new development and promote greater application of the principles of Passive Solar Design. <p>Key policy provisions included:</p> <ul style="list-style-type: none"> Development to be permitted unless it would result in unacceptable adverse impact on a number of planning considerations (para 6.224) A cautious approach within designated landscapes which are of significant value (6.223); Greater acknowledgement of the contribution the renewable energy industry makes, both to the economy and to people's quality of life (6.214 and 6.216); That appropriate weight should be given to how wider environmental, economic and social benefits are assessed (6.225); Specific separation distances for wind farm development (6.227) Renewable energy development on active peatland not permitted in less there are imperative reasons of overriding public interest (6.226). 	<p>The Department consulted on draft revised policy on renewable and low carbon energy between the 6th April 2023 and 30th June 2023. This review of policy was intended to ensure that the SPPS remained fit for purpose and up-to-date to inform plan-making and decision-taking in relation to renewable and low carbon energy planning applications, while reflecting DfI's commitment to the Energy Strategy and the Climate Change (Northern Ireland) Act 2022, which has established a renewable electricity consumption target of 80% by 2030. Changes proposed in the draft revised policy consultation document included:</p> <ul style="list-style-type: none"> The repositioning of planning policy within the framework of a new Energy Strategy that established an updated renewable electricity consumption target of 70% by 2030 that was then increased to 80% by 2030 by the Climate Change (Northern Ireland) Act 2022. Revisions to the aim and objectives of extant policy (para 1.6 and 1.7); <p>New and amended policy provisions in relation to plan-making and the determination of individual planning applications, included:</p> <ul style="list-style-type: none"> A requirement to take "full account" of a wide range of considerations (1.14) A focus on 'maximising' renewable energy (heat and electricity) in appropriate locations, including a requirement on councils to set out policies and proposals in their LDPs to maximise a plan area's contribution to achieving the renewable energy targets (such as, spatial policies and locational criteria securing a wide range of technologies at various scales) (1.8 and 1.9). New policy provisions to support, for example: repowering; co-location; solar farm development; Anaerobic Digestion; as well as advancing and emerging technologies. New policy wording in relation to climate change impacts on biodiversity (1.15) Additions to former policy (6.230) in relation to visual and cumulative impact (1.22) New policy wording in relation to the assessment of noise from wind turbines and "shadow flicker" (1.23) Whilst the policy in relation to peatland was retained and updated to remove reference to IROPI it retained reference to relevant environmental legislation. The draft policy was expanded to recognise the value of degraded peatlands as a material consideration on a case-by-case basis (1.26) <p>Retained policy provisions included:</p> <ul style="list-style-type: none"> Policy to ensure appropriate protection for important landscapes and the local environment; The retention (with some clarifications) of the planning considerations as per paragraph 1.12; The retention of separation distances for windfarms. This was extended to apply to any wind turbine development with a rotor diameter of 50 metres or greater; Retention (with additional provisions) for the need to enable energy from offshore renewable and low carbon energy development proposals to be appropriately connected to onshore networks (1.29). The cautious approach in designated landscapes (1.11). 	<p>All responses received on the draft policy have been taken into account. The revised SPPS subject policy seeks to carefully balance the differing perspectives between the importance of our climate change commitments while also protecting our valued natural and built environment and landscapes. Further information, including the departmental responses to the issues raised, is set out in a Public Consultation Responses Report which is available online.</p> <p>Changes that have been made in finalising the policy are summarised as follows:</p> <ul style="list-style-type: none"> The revised SPPS has a focus throughout on optimising the necessary appropriate renewable and low carbon energy development and supporting infrastructure to make a positive contribution to meeting the targets and decarbonising our energy use. The spatial approach has not been carried forward. Regional Strategic Objectives have been reworked, where appropriate (6.220). Directs that appropriate weight should be given to climate considerations/targets and to biodiversity interests (para 6.221). The planning considerations set out in the consultation draft (1.12) have been amended where appropriate and separated i.e. public safety; human health and residential amenity. The revised SPPS also clarifies that public safety includes roads, rail and aviation safety and also references sensitive receptors as per the policy provisions of PPS 18 is now cancelled (6.223, footnote 53). The draft revised wording on separation distances has been amended to remove the X10 rotor diameter stipulation and clarifying assessment on a case-by- case basis. A case-by-case approach will apply to all other wind turbine development (6.227). The draft provisions for solar farms have been clarified (6.228). Significant weight will be given to the benefits of proposals to re-power, expand and extend solar and wind farms unless impacts are unacceptable (6.230). The revised SPPS provides that due consideration should be given to the use of suitable emerging technologies that can assist with enhancing the renewable energy potential of a development. There should be sufficient and robust evidence available on the emerging technology with any potential adverse impacts (above and/or below ground) understood and addressed in order for a proposal to be considered acceptable (6.235). The approach to peatland from the consultation draft has been carried forward with some further clarifications (6.237). Draft policy provisions related to, e.g., co-location (6.231), Anaerobic Digestion (6.229), visual and cumulative impact (6.233), affording protection to designated landscapes (6.225) and in relation to development associated with offshore proposals (6.240), have been retained, with some clarifications, where appropriate.

This table provides a general overview of the changes between: (i) the former 'Renewable Energy' subject policy, as contained within the Strategic Planning Policy Statement (SPPS, 2015); (ii) the consultation draft revised SPPS (2023); and (iii) the SPPS, Edition 2 (2025).