

By email to: NIP@gasnetworks.ie

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Our Ref: SCP200701.2

Re. Gas Networks Ireland - Draft Network Implementation Plan 2020 and SEA Environmental Report

Dear Sir / Madam,

We acknowledge your notice, dated 6th November 2020, in relation to the Gas Networks Ireland Draft Network Implementation Plan 2020 (the 'Plan') and SEA Environmental Report.

We welcome the opportunity to provide comments on the Plan and associated SEA at this stage in the process. Our role, as a statutory SEA Environmental Authority, focuses on promoting full integration of the findings of the SEA into the Plan and advocating that the key environmental challenges for Ireland are addressed. It is not our function to either approve or enforce the Plan or SEA. This submission is intended to strengthen the Plan and support the integration of environmental considerations and related commitments into the Plan.

Overall Strategy for Grid Development

We note that the Plan considers the capacity constraints in the gas network to be taken into account when considering potential projects and the potential for cumulative effects on the environment that may arise from these new and upgrades to gas infrastructure.

We welcome that the Plan recognises that environmental protection and careful environmental management are essential components to be considered, in implementing the Plan in an environmentally sustainable manner. Table 1.1 clearly shows the list of projects and regions within which elements of the Plan are proposed.

We acknowledge that *Section 2.3 Environmental and Planning Considerations* describes the integration of environmental planning toolkits to be used to inform project development, environmental management and plan implementation activities. We also acknowledge that an environmental energy working group has been established to promote further integration of environmental considerations in implementing the Plan.

Gas Networks Ireland should ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework, Climate Action Plan 2019, and considers the relevant Regional Spatial and Economic Strategies. We also refer you to [Chapter 15 - Environmental Performance, Policy and Implementation](#) of the EPA's [State of the Environment Report](#) for 2020, which may also be of use to consider, as appropriate and relevant to the Plan.

State of the Environment Report – Ireland's Environment 2020

Our recent State of Environment Report [Ireland's Environment – An Assessment 2020](#) identifies thirteen key messages for Ireland. Delivering Ireland's long-term sustainable development and environmental protection goals will require a concerted effort by government departments to address these key actions. These actions are:

1. *National Policy Position for Ireland's Environment* - Recognition of the need for an integrated policy position given the many interlinkages and dependencies.
2. *Full Implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies*
3. Promote the benefits of a clean environment for health and wellbeing
4. Systemic change is needed for Ireland to become climate neutral and a climate resilient society and economy.
5. WHO clean air quality guideline values to be adopted within the Clear Air Strategy as specific targets to achieve.
6. Safeguard nature and wild places as a national priority to preserve its legacy for future generations
7. Improve the water environment and tackle water pollution water quality locally at a water catchment level.
8. Reduce human induced pressures on the marine environment
9. Move away rapidly from extensive use of fossil fuels to the use of clean energy systems
10. An agriculture and food sector that demonstrates validated performance around producing food with a low environmental footprint.
11. Drinking water and wastewater infrastructure must meet the needs of our society
12. Move to a less wasteful and circular economy where the priority is waste prevention, reuse, repair and recycle.
13. Promote integrated land mapping approaches to support decision making on sustainable land use.

In finalising the Plan and integrating the findings of the SEA into the Plan, the relevant recommendations, key issues and challenges described in this report should be taken into consideration.

Specific additional comments on the Plan and the SEA Environmental Report are provided in Appendix I and II respectively.

Future Amendments to the Plan

You should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan.

SEA Statement – “Information on the Decision”

Once the Plan is adopted, an SEA Statement should be prepared that summarises:

- How environmental considerations have been integrated into the Plan;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.

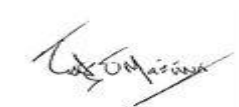
Guidance on preparing SEA Statements is available on the EPA website at the following link: <https://www.epa.ie/pubs/advice/ea/guidanceonseastatementsandmonitoring.html>

Environmental Authorities

You should also consult with the other relevant competent authorities, listed under the SEA Regulations (S.I. No. 435 of 2004, as amended).

If you have any queries or need further information in relation to this submission, please contact me directly. I would be grateful if you could send an email confirming receipt of this submission to: sea@epa.ie.

Yours Sincerely,



Tadhg O'Mahony
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Appendix I – Specific Comments on the Plan

We welcome the inclusion of examples of how proactive environmental management have been undertaken to date for specific projects and how the Plan also takes account of the relevant UN Sustainable Development Goals.

The Plan would benefit from aligning both Plan and SEA-related monitoring aspects. This would help monitor how effective the Plan is being implemented over its 10- year lifespan.

The Plan could be strengthened by the inclusion of a description of the plan alternatives considered and how the preferred alternative was eventually selected. Additionally, aspects such as information on the key significant effects identified and how the Plan proposes to address these by means of specific plan commitments or mitigation measures would be useful to consider including. We would also recommend that consideration be given to including environmental-related monitoring, as described in the SEA, in the Plan.

There is also merit in codifying the Plan commitments to make it easier to compare these against the identified SEA-related mitigation measures. This will also assist in implementation and related reporting.

As referred to in our SEA Scoping Submission (attached for reference purposes), we bring your attention to the EPA-funded Environmental Sensitivity Mapping Webtool (www.enviromap.ie). This tool may assist in identifying areas of greater environmental sensitivity and support consideration of appropriate mitigation measures and objectives/commitments to protect or carefully manage potential development activities in these areas.

Appendix II – Specific Comments on the SEA Environmental Report

Non-Technical Summary

You should review the content of the Non-Technical Summary to ensure that it includes the relevant information required under Schedule 2(j) of the SEA regulations (SI 435 of 2004, as amended).

Consider updating the Non-Technical Summary to reference the recently published [EPA State of the Environment Report](#) and we recommend that the Non-Technical Summary includes a comment that it should be used to help inform the implementation of the Plan and any updates to the Plan over its lifetime.

The Non-Technical Summary may benefit from using less acronyms to ensure that the information contained therein is easily understood. Additionally, it could also be improved by providing some relevant summary maps and tables.

Consultation

You should describe the nature and outcome of any transboundary consultations carried out. Additionally, there is merit in including a section summarising how submissions received from the SEA statutory authorities, at SEA Scoping stage have been considered.

Chapter 3 – Relationship with other plans and programmes

We note the list of plans and programmes listed in Table 3.1. With regards national level plans, we recommend that you review the list of Plans in this table and update as appropriate. For example, the National Spatial Strategy should be replaced with the National Planning Framework, and ‘programme for partnership government 2016’ should be replaced with the ‘Programme for Government 2020’. Reference should also be made to the Climate Action Plan 2019 and the National Marine Planning Framework. Additionally, as referred to previously, we also refer you to [Chapter 15 - Environmental Performance, Policy and Implementation](#) of the EPA’s State of the Environment Report to consider, as appropriate and relevant to the Plan.

Additional international-level plans, programmes, strategies, conventions to consider include the ESPOO convention and the EU Green Deal. It is also worth noting that the Shellfish Directive was repealed, and shellfish are now afforded protection under the Water Framework Directive.

Under ‘Regional’ plans and programmes you should replace the ‘Regional Planning Guidelines’ with the ‘Regional Spatial and Economic Strategies’. Reference in Table 3 to ‘Retail Strategy’ and ‘Transport Strategy’ is ambiguous and should be updated to reflect the relevant strategies that are being referred to, for example the Metropolitan Area Transport Strategies (NTA).

There is also merit in including any relevant transboundary key plans or programmes, that need to be considered in finalising and implementing the Plan.

Chapter 4 – SEA Methodology

In *Section 4.3 of the SEA Environmental Report* (p23), we note that reference is made that no responses were received during this time from the statutory authorities. This section and statement should be updated to show that the EPA made a submission at the SEA scoping stage, which issued on the 29th July 2020, within the specified time period. We attach this previous submission for reference purposes.

With regards *Section 4.5 – Alternatives*, we refer you to our guidance on developing and assessing alternatives in SEA (EPA, 2015), that should also be referred to and considered.

In relation to *Section 4.8 SEA Statement*, we also bring to your attention our guidance on SEA Statements and Monitoring (EPA, 2020) that would be useful to consider in finalising the SEA process.

Chapter 5 – Current State of the Environment

We recommend that where EPA reports are referred to, the most up to date versions are used to update the baseline information, to ensure that the most current available information is taken into account.

In *Section 5.3 Status and Trends*, you should review and update the information provided here, taking into account the report '[The Status of EU Protected Habitats and Species In Ireland](#)' (DCHG, 2019).

In *Section 5.8 Landscape and Visual*, there would be merit in referring to research by the Marine Institute in relation to regional seascape character assessments <https://emff.marine.ie/blue-growth/project-13-definition-and-classification-ireland%E2%80%99s-seascapes>.

Additionally, reference to the CORINE data set should be updated from 2012 to refer to the CORINE 2018 dataset and the relevant references to land cover information updated accordingly. We note that the SEA indicates that wetlands accounting for 16% total land cover. The EPA's recent State of the Environment Report for 2020 reports that wetlands account for 14.9% of total land cover area, based on CORINE 2018 data.

Chapter 6 – Objectives, Targets and Indicators

There is merit in codifying the objectives presented in Table 6.1, with a view to assisting with the assessment process and allowing these environmental objectives to be compared with the plan commitments.

With regards the Human Health Indicator, in Table 6.2, consider changing the indicator text as follows "**Changes improved-in trends in perceived health status**", to provide for positive and negative trends to be monitored.

Additionally, with regards 'Water Resources', consider amending the first indicator bullet point, to also reflect the potential implications for groundwater, given that much of the network infrastructure will be underground.

Consideration and Assessment of Alternatives

There is also merit in further clarifying how the selection of alternatives (Section 7.3 and Section 7.4) have been assessed to determine which of these became the preferred alternative. We refer to you guidance note on [Developing and Assessing Alternatives in Strategic Environmental Assessment](#) (EPA, 2015), which may be useful to consider at this time.

Assessment of Significant Effects

In *Section 8.1 Summary of Potential Environmental Effects*, there is also merit in referring to the importance in/of considering the potential for cumulative effects arising from the potential development of multiple proposed new infrastructure and upgrades to gas related infrastructure in implementing the Plan. Where uncertain effects are identified, the proposed mitigation measures should be sufficient to cater for this uncertainty in a consistent manner.

With regards Section 8.2.2 Cumulative Effects, we recommend taking into account our [Good Practice Guidance Note on Cumulative Effects](#) (EPA, 2020).

In *Table 8.5: Assessment of Cumulative Effects*, we suggest including a reference to the National Marine Planning Framework and the National River Basin Management Plan, to consider potential effects on water bodies in the marine, coastal/estuarine and terrestrial environment. Additionally, the Government's [National Energy and Climate Plan 2021-2030](#) should also be incorporated as appropriate.

Mitigation Measures

In *Section 9.1 – Mitigation*, we suggest that paragraph 3 is updated to make more of a definitive commitment that in implementing the Plan, projects arising out of the Plan will not conflict with the commitments and obligations of higher-level plans and programmes, comply with the relevant legislation, guidelines and align with the relevant national environmental policies.

As suggested previously, we suggest in *Table 9.1 – Mitigation Measures for the Draft NIP*, you should ensure that the Plan includes clear commitments, and where relevant, timescales, to implement the mitigation measures.

Monitoring

The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and address the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities to further copper fasten its implementation.

Where the monitoring identifies adverse impacts during the implementation of the Plan, Gas Networks Ireland should ensure that suitable and effective remedial action is taken. A statement to this effect should be built into the monitoring programme.

Guidance on SEA-related monitoring is available on the EPA website at <https://www.epa.ie/pubs/advice/ea/guidanceonseastatementsandmonitoring.html>

We also acknowledge that the Plan refers to the publication of Gas Networks Ireland's first '*Sustainability in Action Report 2018*'. If this represents the first in a series of ongoing annual reports, we would suggest that where possible, incorporating relevant monitoring aspects from the Plan and SEA would help report on how effectively the Plan is being implemented, taking environmental considerations into account.