



Northern & Western
Regional Assembly

Border, Midland and Western Regional Operational Programme 2014-2020

Strategic Environmental Assessment (SEA) SEA Statement



Clár Chistí Struchtúracha agus
Infheistíochta AE na hÉireann
2014 - 2020

Cómhainithe ag Rialtas na hÉireann
agus ag an Aontas Eorpach



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1. INTRODUCTION

1.1. Background and Legislative Context

1.1.1. 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/EC on the assessment of the effects of certain plans and programmes on the environment (SEA Directive), and came into force in 2001.

1.1.2. The Directive was transposed into Irish law via the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (SI 435/2004 and SI 200/2011), and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI 436/2004 and SI 201/2011).

1.1.3. The Border, Midland, and Western Regional Assembly¹ (“BMW”) has prepared a Regional Operational Programme (“ROP”) for 2014-2020 which sets out a development strategy, including a coherent set of priorities to meet the strategic objectives that have been set for the ROP, taking account of specific regional needs.

1.1.4. The SEA Directive requires the BMW Regional Assembly, as the programming authority, to assess the likely significant effects of its plans and programmes on the environment. The BMW Assembly has instructed ADAS UK to carry out this process which consists of three main components:

1. The preparation of an Environmental Report (ER), where the likely significant effects of the ROP are identified and assessed.

The ER is the principal document in the SEA process and

¹ As and from the 1st January 2015, the Border, Midland and Western Regional Assembly is now titled the Northern and Western Regional Assembly, arising from the enactment of the Local Government Reform Act, 2014. The Northern and Western Regional Assembly is the legal successor to the BMW Regional Assembly and will be the designated Managing Authority for the BMW Regional Operational Programme. Every reference in this document to the BMW Regional Assembly is now taken as the Northern and Western Regional Assembly



summarises the likely effects of the ROP on the environment, and measures which would mitigate any significant adverse effects.

2. A consultation on the ER and draft ROP with the public, statutory environmental bodies, and any other EU Member State which might be affected.
3. The consideration of the findings of the ER and the consultation process in deciding whether to adopt or modify the draft ROP.

The ROP was adopted by the European Commission on 12th December 2014. As such in accordance with Statutory Instrument No 436/2004 (as amended), the BMW Regional Assembly is required to prepare a statement providing information on this decision (the “SEA Statement”).

1.2. Summary of the SEA Process

1.2.1. The SEA followed an approach set out in Table 1.1 below which is based on the guidance produced by the Government of Ireland in 2004 and equivalent standards established by the UK Government.

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).
Initial public consultation	Consult the statutory environmental authorities on the scope of the SEA.
Stage B: Developing and refining alternatives and	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.



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

1.2.2. Interaction between the BMW Assembly and ADAS UK 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 a highly iterative process. The consultation phases on these documents with statutory environmental authorities, the public, and other EU Member States were more formal in nature and are described in Section 3 below.

1.3. Purpose of the SEA Statement

1.3.1. 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 ROP and related monitoring measures.



1.3.2. Upon adoption of the ROP, the SEA Statement must be sent to the environmental authorities consulted, the public, and where relevant other EU Member States in relation to any transboundary consultations.

The SEA statement includes a summary of the following:

1. How environmental considerations were integrated into the ROP.
2. How submissions and observations made to BMW, consultation outcomes, and the ER were integrated into the ROP.
3. The reasons for choosing the ROP as adopted, in the light of other reasonable alternatives considered.
4. The measures agreed upon to monitor any significant adverse effects, as well as any potential unforeseen adverse effects arising from the implementation of the ROP



2. SUMMARY OF HOW ENVIRONMENTAL CONSIDERATIONS WERE INTEGRATED INTO THE PLAN

2.1. Introduction

2.1.1. Environmental considerations were integrated in the BMW ROP process through the SEA process. As described in Section 1.2 this involved identification of the baseline situation, particularly constraints and sensitivities.

2.2. Environmental Baseline

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

2.2.2. Baseline data was obtained from the 2012 EPA report, Ireland's Environment, along with the EPA and other Government websites, the BMW Needs Assessment, and other documents.

2.2.3. The environmental sensitivities were mapped (Appendix C of the Environmental Report) and strengths, weaknesses, opportunities and threats identified for each of eleven sustainability topics. These were fed back to BMW Regional Assembly through the draft Scoping Report and draft Environmental Report.

2.2.4. 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

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

2.3.2. The draft BMW ROP 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 ROP priorities and objectives.

2.3.3. Assessments of alternatives to the BMW ROP as a whole have been undertaken, along with an assessment of likely cumulative effects of objectives within the draft BMW ROP and likely in-combination effects of the draft BMW ROP with other plans and programmes.

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

2.4. Mitigation Measures

2.4.1. 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*'. The SEA process identified some uncertain effects on the environment of the proposed BMW ROP being implemented. To ensure that these identified adverse effects are minimised, a number of potential mitigation measures were proposed.

2.4.2. The proposed mitigation measures were considered by the BMW Regional Assembly and the measures that the Managing Authority will incorporate to mitigate the environmental impacts of the ROP during the course of its implementation include:

- Standard mitigation in line with existing planning and EIA requirements will be carried out to determine the likelihood of damage to habitats and species during construction works.



- Where developments would otherwise pass through a protected site, alternative routes will be considered in accordance with statutory requirements.
- Standard best practice methods will be followed to avoid damage to soils during construction works.
- Standard best practice methods will be followed to avoid damage to water during construction.
- Urban regeneration works which provide adaptation to climate change will be eligible for inclusion in the integrated urban development strategies to be submitted by designated local authorities.
- Standard best practice methods will be followed to avoid damage to heritage assets during construction works.
- Standard best practice methods will be followed to avoid damage to landscape character during construction.

2.4.3. Though not a legal requirement, the SEA also identified potential enhancement measures to maximise the beneficial effects offered by the BMW ROP.

2.4.4. The Managing Authority will take into account the following enhancements into the implementation of the Operational Programme:

- Marine research which focuses on biodiversity and ecosystem services will be eligible for support. This will be beneficial to the understanding of marine ecological systems.
- Walking, cycling and other outdoor activity facilities will be eligible for inclusion in the integrated urban development strategies to be submitted by designated local authorities. These will have a beneficial effect on public health and quality of life in urban areas. They will also reduce greenhouse gas emissions and improve air quality in urban areas, should the local authority prioritise actions in these areas.



- Provision of green spaces and public trees will be eligible for inclusion in the integrated urban development strategies to be submitted by designated local authorities. These will have a beneficial effect on soils and on air quality in urban areas, should the local authority prioritise actions in these areas.
- The restoration and conservation of the built environment will be eligible for inclusion in the integrated urban development strategies to be submitted by designated local authorities. These will have a beneficial effect on the quality and diversity of cultural heritage, should the local authority prioritise actions in these areas.
- Local authorities will be encouraged to make use of sustainable, locally sourced, and/or recycled materials where possible and in line with procurement rules, thus conserving material assets.



3. SUMMARY OF HOW SUBMISSIONS, OBSERVATIONS AND CONSULTATIONS AND THE ENVIRONMENTAL REPORT WERE INTEGRATED INTO THE PLAN

3.1. Introduction

3.1.1. Consultation has been carried out on the BMW ROP throughout its preparation. Table 3.1 below details the various consultation exercises undertaken.

Table 3.1: Consultation Summary

Date	Consultation Summary
April 2013	<p>Initial Stakeholder Consultation</p> <p>A consultation paper was issued to all identified stakeholders in April 2013. This paper included the policy context for the 2014-2020 programmes, details on thematic objectives and investment priorities, implementation arrangements and programme requirements.</p> <p>24 submissions were received. These submissions were reviewed in detail in the context of the Needs Analysis and the identification of investment priorities and a summary of each was included in the draft ERDF Needs Analysis Report.</p>
13th November 2013 5th December 2013	<p>Consultation on draft ERDF Needs Analysis and identified investment priorities</p> <p>A Partnership Agreement consultation workshop was held in Dublin, which was attended by national and regional authorities and representative organisations.</p> <p>A half-day regional consultation workshop was held on 5th December 2013 in the offices of the BMW Regional Assembly. The workshop facilitated engagement with stakeholders on the outcomes of the Needs Analysis, the proposed investment priorities and the ex ante evaluation process.</p> <p>In total, 130 organisations were invited to attend, of whom 50 attended, representing local authorities, regional authorities, state development agencies, higher education institutions, Regional OP Monitoring Committee members, Government Departments and economic and social partners.</p> <p>The preparation of the Operational Programme and the potential investment priorities were presented at separate meetings of the Border, Midland and West Regional Authorities between September 2013 and January 2014.</p>
March to November 2013 23rd January 2014	<p>Meetings with Government Departments and Agencies</p> <p>Meetings were held with relevant Government Departments and Agencies on the preparation of the Regional Operational Programmes and potential actions for inclusion in the programmes.</p> <p>Roundtable meetings involving the Managing Authorities for all 4 funds were held with representatives of the horizontal principles of sustainable development, equality, gender equality and social inclusion in Dublin to</p>



Date	Consultation Summary
18th June 2014	<p>review the proposals for the integration of these principles into the European Structural and Investment fund programmes, in compliance with Articles 7 and 8 of the Common Provisions Regulation.</p> <p>A roundtable meeting was hosted jointly by the Regional OP Managing Authorities with the statutory bodies with responsibility for the horizontal principles. The purpose was to discuss in detail the proposed arrangements for the integration of the horizontal principles into the Regional OPs. The meeting reviewed proposed arrangements for screening each of the co-funded schemes in respect of the principles and the arrangements for reporting to the managing Authority and the Monitoring Committee.</p>
14th April 2014	<p>SEA Scoping Consultation</p> <p>The Scoping Report was issued to the Consultation Bodies on 14th April 2014. This included the Environment Protection Agency (EPA), the Department of the Environment, Community and Local Government (DECLG), the Department for Communications, Energy and Natural Resources (DCENR), the Department of Agriculture, Food and the Marine (DAFM), and the Department of Arts, Heritage and the Gaeltacht (DAHG). Due to the likelihood of transboundary effects, it also included the Northern Ireland Environment Agency (NIEA). Five submissions were received and these were taken into account in the preparation of the Environmental Report.</p>
30th May - 30th June 2014	<p>Public Consultation on draft BMW ROP</p> <p>The final draft of the BMW ROP along with the draft Environmental Report was made available widely for public consultation between 30th May and 30th June 2014. Arising from this, 19 submissions were received and these were reviewed and summarised and informed final amendments to the Operational Programme text.</p>

3.2. Pre-draft Consultations

Initial Stakeholder Consultation

3.2.1. The first phase of the preparation process was the issuing of a consultation paper to all identified stakeholders in April 2013. This paper included the policy context for the 2014-2020 programmes, details on thematic objectives and investment priorities, implementation arrangements and programme requirements. Stakeholders were invited to make submissions and to respond to key questions as follows:

1. What are the problems / issues /opportunities from your perspective (or within the remit of your organisation) that are best addressed by the new round of ERDF Programmes? (Please bear in mind the eleven Structural Funds thematic objectives from the draft regulations referred to above).



2. From the list of thematic objectives, in your opinion which other objectives should be included in the Operational Programmes, not covered by the first four Thematic Objectives?
3. Bearing in mind the thematic objectives, do you have any views on whether new implementation arrangements, such as Community Led Local Development, Integrated Territorial Investments, or Financial Instruments should be deployed in the new programming period?
4. What key things need to change in the way the Funds are currently used in order to reduce the administrative burden involved, whilst conforming to EU management control requirements?
5. Are there improvements which could be made to the way the Horizontal Principles of Equality and Sustainable Development are integrated into the programme design?

3.2.2. This consultation paper and invitation to make submissions was issued to the following:

- Regional Authorities, Local Authorities;
- Government Departments and Development Agencies;
- Potential Implementing Bodies and beneficiary Bodies;
- Higher Education Institutions and their regional network organisation;
- Organisations representing business and employers and trade unions;
- Community and voluntary organisations;
- Organisations representing the horizontal principles of environmental sustainability, and equality, including gender equality and social inclusion.

3.2.3. In addition, the Monitoring Committee for the BMW Regional OP was consulted at meetings on 29th April 2013 and 13th May 2014 and the Border, Midland and Western Regional Assembly was consulted on 4th



October 2013 and 21st March 2014 and approved the final draft on 25th April 2014.

3.2.4. Arising from the invitation to make submissions, 24 submissions were received. These submissions were reviewed in detail in the context of the Needs Analysis and the identification of investment priorities and a summary of each was included in the draft ERDF Needs Analysis Report. They were published on the BMW Regional Assembly web-site (www.bmwassembly.ie) along with the draft Needs Analysis Report.

Consultation on draft ERDF Needs Analysis and identified investment priorities

3.2.5. The ERDF Needs Analysis process was undertaken jointly with the Southern and Eastern Regional Assembly, with the expert assistance of the National Institute for Regional and Spatial Analysis, NUI Maynooth and the Limerick Institute of Technology. The outcomes of the analysis are detailed in Chapter 2 of this Operational Programme.

3.2.6. An overview of the Needs Analysis and proposed investment priorities for the ERDF co-financed Regional OPs was presented at the Partnership Agreement consultation workshop on 13th November in Dublin, which was attended by national and regional authorities and representative organisations.

3.2.7. Following completion of the Needs Analysis, a half-day regional consultation workshop was held on 5th December 2013 in the offices of the BMW Regional Assembly. The workshop facilitated engagement with stakeholders on the outcomes of the Needs Analysis, the proposed investment priorities and the *ex ante* evaluation process.

3.2.8. In total, 130 organisations were invited to attend, of whom 50 attended, representing local authorities, regional authorities, state development agencies, higher education institutions, Regional OP Monitoring Committee members, Government Departments and economic and social partners.

3.2.9. The preparation of the Operational Programme and the potential investment priorities were presented at separate meetings of the Border,



Midland and West Regional Authorities between September 2013 and January 2014.

Meetings with Government Departments and Agencies

3.2.10. Over the March to November 2013 period, meetings were held with relevant Government Departments and Agencies on the preparation of the ROPs and potential actions for inclusion in the programmes. These meetings were held jointly with the Southern and Eastern Regional Assembly and with the Department of Public Expenditure and Reform.

3.2.11. Roundtable meetings involving the Managing Authorities for all 4 funds were held with representatives of the horizontal principles of sustainable development, equality, gender equality and social inclusion in Dublin on 23rd January 2014 to review the proposals for the integration of these principles into the European Structural and Investment fund programmes, in compliance with Articles 7 and 8 of the Common Provisions Regulation.

3.2.12. A roundtable meeting was hosted jointly by the ROP Managing Authorities with the statutory bodies with responsibility for the horizontal principles on 18th June 2014 to discuss in detail the proposed arrangements for the integration of the horizontal principles into the ROPs. The meeting reviewed proposed arrangements for screening each of the co-funded schemes in respect of the principles and the arrangements for reporting to the Managing Authority and the Monitoring Committee.

3.3. SEA Scoping Consultation

3.3.1. 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 on the programme is finalised.

3.3.2. The Scoping Report was issued to the Consultation Bodies on 14th April 2014. This included the Environment Protection Agency (EPA), the Department of the Environment, Community and Local Government (DECLG), the Department for Communications, Energy and Natural Resources (DCENR), the Department of Agriculture, Food and the Marine (DAFM), and the Department of Arts, Heritage and the Gaeltacht (DAHG). Due to the likelihood of transboundary effects, it also included the Northern Ireland Environment Agency (NIEA).

3.3.3. Responses were received from EPA, DAHG, NIEA, DAFM and the Geological Survey of Ireland (via DCENR). A summary of the consultation topics is provided below:

- EPA:
 - Recommended list of additional plans, programmes, guidance and reports to be considered;
 - Promotion of Green Infrastructure and Need to Protect Ecological Sensitivities;
 - Opportunities for transboundary collaboration;
 - Cumulative/ in-combination effects in the context of both the SEA Directive and the Habitats Directive - Appropriate Assessment;
 - Describing sectors in relation of low carbon economy/climate change adaption;
 - Consideration of rural environmental protection / wider countryside aspects;
 - Assessing inter-relationship between topics;
- DAHG:
 - Recommended use of National Parks and Wildlife Service publications and website, additional plans and programmes and other reports;
 - More detailed source-referencing;



- Consideration of National Biodiversity Plan and Local Biodiversity Action Plans;
- Correction to number of SPAs;
- Consideration of regional variations in ecological receptors;
- Consideration of impacts of SEA objectives;
- Inclusion of clear methodology;
- Inclusion of mitigation and monitoring;
- Screening for Appropriate Assessment;
- NIEA:
 - Potential for cross border effects in Border Regions;
 - Nitrogen deposition on designated habitats;
 - Potential for Annex 1 and Annex 2 species to migrate across borders;
 - Inclusion of Northern Ireland designations;
 - Air quality issues;
 - Inclusion of mitigation and monitoring;
 - Screening for Appropriate Assessment;
- Climate Change Section of Dept of Agriculture, Food & The Marine:
 - Consideration of Food Harvest 2020;
 - Consideration of fishery and aquaculture related issues;
- Geological Survey of Ireland;
 - Use of website for information.

3.4. Submissions and Observations

3.4.1. The Environmental Report and draft BMW ROP were presented for public and statutory consultation over the period from 3 Jun 2014 to 1 Jul 2014. The statutory environmental authorities were the same as those listed in Section 3.3 above. In line with the SEA Directive and its Irish transposition, comments from these bodies, members of the public, and other stakeholders were duly noted and considered, and if appropriate addressed in the final BMW ROP document.



3.4.2. Responses were received from 19 organisations and bodies including two of the statutory environmental authorities. To permit efficient analysis these were divided into those responses from statutory and non-statutory consultees.

Statutory Environmental Authorities

3.4.3. The main comments were from the EPA and DAHG. Some of these were directed towards the ROP itself whilst others concerned the ER. A summary of these, and the response taken is summarised in Table 3.2.1 and 3.2.2 below:

Table 3.2.1: Statutory Consultees: ROP Related Responses

Topic Summary of Comment (Consultee)	Response Summary of Action taken
<p>Thematic Objectives</p> <p>Consideration should be given to supporting TO5 (EPA)</p> <p>Consideration of climate change adaptation measures to complement what is not being addressed in the Rural Development Plan (EPA)</p>	<p>The Needs Analysis performed by BMW deemed these not be not priority items. Thematic concentration applied elsewhere.</p>
<p>Integration with SEA</p> <p>Consideration to include a commitment to SEA-related environmental monitoring (EPA).</p> <p>Include Technical Summary of SEA as Annex (EPA).</p> <p>Section 2 of the ROP should describe threats/weaknesses identified in SEA (EPA).</p>	<p>BMW has put forward five areas for monitoring.</p> <p>A Technical Summary will be included as an Annex</p> <p>BMW is considering their inclusion in the ROP.</p>
<p>AA</p> <p>ROP should be screened for AA (DAHG)</p>	<p>AA was suggested to BMW, but has been deferred to lower level Plans.</p>
<p>Other</p> <p>Clarification of a statement regarding undesignated nature conservation sites (DAHG)</p> <p>Explanation as to how environmental effects will be identified, assessed, avoided, minimised at all levels of the program - i.e. in relation to requirements of Birds, Habitats, and EIA Directives (DAHG)</p> <p>Error in text on sustainable development (DECLG).</p>	<p>Statement and data source updated in the ROP.</p> <p>BMW has pointed out that compliance with environmental legislation is a requisite for all implementing bodies/beneficiaries of ROP and there is no need to list every individual item.</p> <p>Text error corrected.</p>



Table 3.2.2: Statutory Consultees: ER Related Responses

Topic Summary of Comment (Consultee)	Response Summary of Action taken
<p>Alternatives Green Infrastructure approach (Alternative 5) should have greater consideration in development of the ROP (DAHG)</p>	<p>Alternative 5 measures were already taken into account in implementation of ROP (see below)</p>
<p>Assessment of Environmental Effects An assessment needed of how “actions that deliver benefits to one Strategic Environmental Objective may adversely affect another” (DAHG)</p>	<p>This was deemed to mean cumulative / synergistic effects which had already been considered.</p>
<p>Monitoring The need for monitoring to be carried out to identify unforeseen effects / ensure mitigation effectiveness (EPA, DAHG)</p> <p>More detail on nature of monitoring programme (EPA, DAHG)</p> <p>Concern over appropriateness of “length of cable” and “no of sites” as indicators (DAHG)</p>	<p>The ER was amended to stress the unforeseen effects aspect.</p> <p>More specific detail on monitoring programme would be incorporated at Intermediate Body level. A number of suggestions for appropriate indicators/frequency were made in Appendix F of the ER.</p> <p>This was still deemed an appropriate indicator at the high level to assess the effectiveness of the mitigation proposed.</p>
<p>Mitigation Existing planning / environmental guidelines and initiatives to be incorporated into mitigation measures (EPA) Mitigation to satisfy requirements of various EU environmental Directives (EPA)</p>	<p>These were already incorporated into the mitigation suggestions.</p>
<p>AA ROP should be screened for AA (DAHG) The findings of SEA/AA for National Broadband Plan should be taken into consideration (EPA)</p>	<p>AA was suggested to BMW, but has been deferred to lower level plans. The SEA/AA for this Plan was not yet available.</p>
<p>Other Factual errata in baseline data (DAHG) Tabulation of certain information recommended (EPA)</p>	<p>Errors were corrected. Tables were already present.</p>

Non-Statutory Consultees

3.4.4. Comments on the ROP from non-statutory consultees were too numerous to present individually. Where possible, the responses from each consultee have been itemised into observations. Table 3.3.1 shows the number of observations received from each respondent and



Table 3.3.2 shows the breakdown of these observations by sustainability topic. In the most part the responses either provided more baseline information, agreed with the choice of thematic objectives and made suggestions for minor additions to their scope, or requested inclusion of additional thematic objectives to benefit a particular locality or interest group.

3.4.5. Where additional baseline information was useful and relevant to the ROP, BMW has included it. Where minor or major additions to objectives were suggested, they were not included by BMW. This was either because funding was already available for their request under the ROP, or because it was necessary to focus the thematic objectives of the ROP. In some cases, the request went beyond the scope of what could be mandated in the ROP and so had to be declined.

Table 3.3.1: Number of Non-statutory Consultee Responses by Consultee

Consultee	Number of Responses
Western Development Commission	28
Lionra Regional Higher Education Network	2
Westmeath Environmental Group	9
National Disability Authority	4
Kilbeggan Community Development Organisation	1
Local Enterprise Office, Donegal County Council	4
Irish Council for Social Housing	1
Social Inclusion Division, Department of Social Protection	1
Director of Services, Donegal County Council	4
Mayo County Council	4
Irish Wind Energy Association	2
Athlone Institute of Technology	1
Netwell Centre, Dundalk	3
Dundalk Chamber of Commerce	13
Galway Chamber of Commerce	10
Age Friendly Ireland	5



Table 3.3.2: Non-statutory Consultee Observations by Sustainability Topic (Some observations concerned multiple topics)

Topic	Number of Responses
Ecology and Nature Conservation	2
Socio-Economics	52
Health and Quality of Life	11
Soil and Land Use	0
Water	2
Air Quality	0
Climate Change	6
Material Assets	2
Cultural Heritage	1
Landscape and Seascape	1
Green Infrastructure and Ecosystem Services	5
Other / General	11

3.5. Transboundary Consultations

3.5.1. The potential for transboundary effects was identified in relation to Northern Ireland. As described above, the NIEA was consulted as part of the Scoping and Public Consultation stages of the SEA. A response was received and addressed during the Scoping stages (see Section 3.3.3 above), but no response was received during the Public Consultation stage.



4. CONSIDERATION OF ALTERNATIVES

4.1. The Alternatives Considered

4.1.1. Consideration of alternatives is a key feature of the SEA process. The SEA Directive requires that the Environmental Report should consider:

‘Reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme’ and give ‘an outline of the reasons for selecting the alternatives dealt with’ (Article 5.1 and Annex I (h)).

4.1.2. In practical terms, it refers to possible alternative mechanisms for delivering the BMW ROP, and the assessment of the impacts of each of these options against the SEA Objectives.

4.1.3. With (part) European funded programmes such as the BMW ROP, constraints on what practical alternatives exist are often set by the need to comply with pre-set criteria determined at a European level. The Common Provisions Regulation for European Structural and Investment Funds (EU) 1303/2013 stipulates that programme authorities, in particular in ‘more developed’ regions must apply thematic concentration, thus limiting their strategic choices to a narrow range of pre-determined investment priorities. This can have the effect of limiting the alternatives that are available to the programme makers.

4.1.4. The SEA has focused only on the reasonable alternatives that have emerged during the drafting of the BMW ROP, i.e. other relevant Investment Priorities and different delivery mechanisms that BMW has considered during the Programme development process.

4.2. Description of Alternatives Considered

Alternative 1 – Continue with the ROP 2007-2013

4.2.1. This alternative assumes that the current ROP will be extended to the period 2014-2020, with the current priorities and interventions (listed below) continuing.



- **Priority Axis 1: Innovation, ICT and the Knowledge Economy (€200m)**

To enhance the research, innovation and ICT infrastructure and capacity of the BMW Region, to promote entrepreneurship and enterprise development and to support collaboration and technology transfer between research institutions and the business sector that responds to the economic development needs of the region. Interventions supported under this Priority include:

- a. Applied Research Enhancement, Incubation Facilities;
- b. Building research capacity;
- c. Microenterprise, Innovation and Entrepreneurship;
- d. Broadband provision and demand stimulation;
- e. Building world-class human capital in research through Science Foundation Ireland Awards; and
- f. Experimental Innovative Actions.

- **Priority Axis 2: Environment and Risk Prevention (€75m)**

The objective of this Priority is to contribute to the sustainable development of urban and rural areas and the protection and enhancement of the urban and rural environment and the protection of surface and groundwater from pollution. The priority will also stimulate energy efficiency, renewable energy deployment and the integration of sustainable energy practices into public policies. Interventions supported under this Priority include:

- a. Rural Water Source Protection;
- b. Pilot Village Sewerage Scheme;
- c. Water Supply and Waste Water Treatment;
- d. Water Conservation;
- e. Natural and Cultural Heritage;
- f. Waste Management and Energy Efficiency; and



g. Renewable Energy.

- **Priority Axis 3: Urban Development and Secondary Transport Networks (€178m)**

To strengthen the spatial structuring of the BMW Region by investing in integrated sustainable initiatives in order to enhance the competitiveness, accessibility and social cohesion of the region's growth centres and to modernise the region's transport infrastructure. Interventions supported under this Priority include:

- a. Urban Regeneration through providing supports to Gateways and Hubs;
- b. Key Linking Routes; and
- c. Public Transport.

- **Priority Axis 4: Technical Assistance (€4.5m)**

Support for programme management and implementation, including technical support, communications and publicity, financial control activities, research and evaluation actions.

Alternative 2 – Do nothing or ‘zero’ option

4.2.2. This possible alternative assumes that the current 2007-2013 Programme will run its course and the new ROP will not be adopted in the BMW Region. EU and Irish Government funding would thus be removed.

Alternative 3 – Draft overview of potential priorities as at November 2013

4.2.3. The document produced in November 2013 incorporates a large number of potential Investment Priorities within Thematic Objectives (“TO”) 1, 2, 3, 4 and 6 of the ERDF Regulations. All of these priorities are appropriate under the ERDF Regulations and relevant to Ireland, however the limited funding available to the BMW Regional Assembly will not stretch to covering all of these possible priorities. Nevertheless, the priorities initially considered by BMW as possibilities for inclusion in the draft Programme are presented below.



- **Priority 1: Research Innovation & the Knowledge Economy (T.O.1) (€120m)**
 - a) Enhancing research and innovation infrastructure and capacities to develop R&I excellence and promoting centres of competence, in particular those of European interest.
 - b) Supporting technological and applied research, pilot lines, early product validation actions, advanced manufacturing capabilities and first production in Key Enabling Technologies and diffusion of general purpose technologies.
 - c) Promoting business investment in innovation and research, product and service development, technology transfer, social innovation and public service applications, demand stimulation, networking, clusters and open innovation through smart specialisation.
 - d) Developing links and synergies between enterprises, R&D centres and higher education.
- **Priority 2: Next Generation Broadband (T.O.2) (€70m)**
 - a) Extending broadband deployment and the roll-out of high-speed networks and supporting the adoption of future and emerging technologies and networks for the digital economy.
 - b) Developing ICT products and services, e-commerce and enhancing demand for ICT.
 - c) Strengthening ICT applications for e-government, e-learning, e-inclusion and e-health.
- **Priority 3: S.M.E. Competiveness (T.O.3) (€45m)**
 - a) Promoting entrepreneurship, in particular by facilitating the economic exploitation of new ideas and fostering the creation of new firms.
 - b) Developing and implementing new business models for SMEs, in particular for internationalisation.



- c) Supporting the creation and the extension of advanced capacities for product and service development.
- d) Supporting the capacity of SMEs to engage in growth and innovation process.
- **Priority 4: Renewable Energy & Energy Efficiency (T.O.4) (€66m)**
 - a) Promoting the production and distribution of renewable energy sources.
 - b) Promoting energy efficiency and renewable energy use in enterprises.
 - c) Supporting energy efficiency and renewable energy use in public infrastructures, including in public buildings and in the housing sector.
 - d) Developing smart distribution systems at low voltage levels.
 - e) Promoting research and innovation in low-carbon technologies.
 - f) Developing and promoting the use of new and emerging systems, strategies, and processes and the adoption of new and emerging technologies that contribute to the shift to a low-carbon economy.
 - g) Promotion of high-efficiency co-generation of heat and power.
- **Priority 5: Sustainable Urban Development (T.O.6) (€25m)**
 - a) Action to improve the urban environment, including regeneration of brownfield sites and reduction of air pollution.
 - b) Promoting low-carbon strategies for specific territories, including urban areas.
 - c) Developing environment-friendly and low-carbon transport systems and promoting sustainable urban mobility.



- d) Supporting endogenous growth potential of specific areas by enhancing accessibility to and use of specific natural and cultural resources.
 - e) Addressing the significant needs for investment in the waste sector to meet the requirements of the environmental acquis.
 - f) Addressing the significant needs for investment in the water sector to meet the requirements of the environmental acquis.
- **Technical Assistance (€4m)**
 - a) To support the effective implementation of the Regional Operational Programme.

Alternative 4 – Detailed draft proposals as at May 2014

4.2.4. This alternative is the one that BMW has drafted for public consultation. The possible priorities listed in the November 2013 document (Alternative 3) had to be refined and confirmed following discussions with Government Departments and agencies, with financial allocations approved in April. These selected priorities and objectives are listed below and described in more detail in Section 1.3.

- **Priority 1: RTDI Capability Development (T.O.1) (€104m)**
 - a) Research – To increase the level of strategic research taking place in the BMW region, with Company engagement.
 - b) Innovation – To increase the number of companies undertaking Industry R&D in the BMW region.
- **Priority 2: ICT Infrastructure (T.O.2) (€90m)**
 - a) ICT Infrastructure – To increase the provision of fibre optic links to all un-served towns and villages in the BMW Region.
- **Priority 3: SME Competitiveness (T.O.3) (€58m)**
 - a) Micro-enterprise – To foster and grow a cohort of entrepreneurs in the BMW region with the skills and resources to accelerate the start-up and expansion of their enterprises in order to increase employment in supported micro-enterprises.



- d) SME – To increase the number of established SMEs within the BMW region accessing the supports and finance required for sustainability, internationalisation and growth-oriented actions.
- **Priority 4: Low Carbon Economy (T.O.4) (€36m)**
 - c) Energy Efficiency – To improve energy efficiency in the housing stock.
- **Priority 5: Integrated Urban Development (T.O.6) (€28m)**
 - e) Urban Regeneration – To support integrated regeneration initiatives in selected urban centres that will revitalise the urban centres and address social, economic and environmental challenges.
- **Technical Assistance (€4m)**
 - a) Technical Assistance – To support the effective implementation of the Regional Operational Programme.

Alternative 5 – Ecosystems approach

4.2.5. This alternative option assumes that ROP priorities and objectives, where possible, are adapted to follow an ecosystems approach, based on “the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way” as defined in the Convention on Biological Diversity (2004). It should be noted that where socio-economic needs are greater, funding is unlikely to be available for such an environmental focus. Proposals are as follows:



- **Strengthening research, technological development and innovation (T.O.1) (€42m)**
 - a) Green Innovation Ecosystem - To increase the level of strategic research taking place in the BMW region regarding innovation in the fields of energy, marine and the environment, sustainable use of resources, development of new green industries, and greening of existing industries, with direct application in the commercial economy.

- **Enhancing access to, and use and quality of ICT (T.O.2) (€90m)**
 - a) Broadband Infrastructure – As per Alternative 4, Priority 2.a).
 - b) Re-Use of ICT Equipment – To promote donations of functional ICT equipment by those upgrading to newer models to those less fortunate to enable increased computer use and access to new broadband networks in poorer localities, whilst simultaneously reducing the quantity of Waste Electronic and Electrical Equipment.

- **Enhancing the competitiveness of SMEs (T.O.3) (€58m)**
 - a) Environmental Training of Managers – To foster and grow a cohort of business owners and managers in the BMW region with the skills and resources to fully integrate environmental management and sustainability into their Enterprises for enhanced economic and environmental performance.
 - b) Enabling Green Procurement – To improve sustainability and competitiveness of SMEs and other organisations by supporting a higher degree of collaboration and engagement between all parties in a supply chain (e.g. through eProcurement), and encouraging a more holistic life cycle approach to purchasing.

- **Supporting the Shift Towards a Low Carbon Economy (T.O.4) (€36m)**



- a) Green Heating Fund for Housing – To reduce emissions and spending on energy for social housing tenants or those at risk of energy poverty through funding for green forms of heating, e.g. wood-fired boilers, solar-powered hot water systems and air/water-source heat pumps.
- **Protecting the environment and promoting climate change adaptation (Sustainable Development) (T.O.6) (€90m)**
 - a) Water Sector Investment – To assist Ireland in meeting its Water Framework Directive targets for improving the quality of watercourses by addressing pollution caused by municipal wastewater treatment plants.
 - b) Green Urban Regeneration – To support integrated initiatives for regeneration and improved resilience to climate change in selected urban and rural centres, e.g. creation and/or enhancement of publicly accessible green infrastructure networks, sustainable drainage systems and climate-resilient trees to improve drainage and shading.
 - c) Sustainable Transport Infrastructure – To prioritise improvements to non-vehicular commuting/leisure infrastructure (i.e. cycling/walking routes) and promote integrated public transport usage within the BMW region.
- **Technical Assistance (€4m)**
 - a) Support for Environmental Monitoring – To support the effective implementation of the ROP by ensuring impact on the environment remains minimal throughout the duration of the Programme, and reporting environmental best practice at EU level.

4.3. Assessment of Alternatives



4.3.1. The SEA included a high level matrix assessment each of these five alternatives showing how well each of the respective priorities and objectives performs against the SEA Objectives (see Appendix D of the ER). A summary of this assessment, with accompanying text, is provided in Table 4.1 below, which uses the following key:

Key for Likely Effects	
++	Likely strong beneficial effect
+	Likely beneficial effect
0	Neutral / no effect
-	Likely adverse effect
--	Likely strong adverse effect
+/-	Uncertain effect



Table 4.1: Assessment of Alternatives

SEA OBJECTIVES	ALTERNATIVES				
	1	2	3	4	5
	Continue with ROP 2007-2013	Do Nothing	Outline Draft Proposals as at November 2013	Detailed Draft Proposals as at May 2014	Ecosystems Services Approach
1. Ecology + / -	Priority Axis 2e, which seeks to protect/enhance natural environment and 2a which seeks to protect water sources would have an indirect benefit of enhancing aquatic ecology. However under Priority Axis 3b road works could result in adverse effects on flora and fauna, as could 1d broadband provision.	- The majority of Ireland's habitats that are listed under the Habitats Directive are reported to be of poor or bad conservation status. Significant aspects of biodiversity in Ireland are under considerable threat from unsustainable activities.	+ / - Strategic research relating to marine environment could benefit ecology if the environmental objectives of 'Harnessing our Ocean Wealth' are met. There could be adverse effects on ecology from the following funded activities however: broadband installation; business growth if new premises are required; roof installation and renovation of derelict buildings, due to presence of protected species; urban regeneration, due to high biodiversity of many brownfield sites. In addition, renewable energy sources could have disturbance and other impacts on ecology.	+ / - Strategic research relating to marine environment may benefit ecology assuming the environmental objectives of 'Harnessing our Ocean Wealth' are met. There could be adverse effects on ecology from the following funded activities however: broadband installation; business growth if new premises are required; roof installation and renovation of derelict buildings, due to presence of protected species; urban regeneration, due to high biodiversity of many brownfield sites.	+ / - Research into the environmental and marine fields and encouraging green supply chains should benefit biodiversity, whilst investing in the water sector will benefit aquatic biodiversity. There could be adverse effects from broadband installation whilst urban regeneration could disturb brownfield biodiversity.

SEA OBJECTIVES	ALTERNATIVES				
	1	2	3	4	5
	Continue with ROP 2007-2013	Do Nothing	Outline Draft Proposals as at November 2013	Detailed Draft Proposals as at May 2014	Ecosystems Services Approach
2. Socio-Economics	<p>There would be significant benefits for the economy from funding of research, enterprise growth and extending broadband provision to areas currently without it. Urban regeneration would also boost socio-economic activity and possibly inward investment. In addition, there would be benefits from investment in renewable energy and key linking routes, as well as long-term cost savings in the waste, water and public transport sectors from increased efficiency and fewer disruptions.</p> <p style="text-align: center;">+</p>	<p>Border Region and Midland Region in particular have low disposal income and a high level of relative deprivation, which will continue. Unemployment levels have increased since 2006 and could carry on increasing if there is no investment in this area.</p> <p style="text-align: center;">-</p>	<p>There would be significant benefits for the economy from funding of research, enterprise growth and extending broadband provision to areas currently without it. Urban regeneration would also boost socio-economic activity and possibly inward investment, whilst people would benefit from warmer homes and access to the internet. In addition, socio-economics would benefit from renewable energy, smart distribution systems and the shift to a low carbon economy, as well as long-term cost savings in the waste, water and transport sectors from increased efficiency and fewer disruptions.</p> <p style="text-align: center;">+</p>	<p>There will be significant benefits for the economy from funding of research, enterprise growth and extending broadband provision to areas currently without it. Urban regeneration will also boost socio-economic activity and possibly inward investment, whilst people will benefit from warmer homes and access to the internet.</p> <p style="text-align: center;">+</p>	<p>The economy and soc will benefit from green growth, increased sustainability and efficiency in business, from cost savings from improved environment and water/transport sectors. Inequality and social exclusion will all reduce.</p> <p style="text-align: center;">+</p>

SEA OBJECTIVES	ALTERNATIVES				
	1	2	3	4	5
	Continue with ROP 2007-2013	Do Nothing	Outline Draft Proposals as at November 2013	Detailed Draft Proposals as at May 2014	Ecosystems Services Approach
3. Health	<p>Health would benefit from continued investment in protecting water supply, treating of waste water and waste management. Investment in public transport should reduce CO2 emissions and improve accessibility. Health would also benefit indirectly from enhancement to natural and cultural heritage.</p>	<p>Existing trends, e.g. fuel poverty, will continue.</p>	<p>There would be health benefits for those currently in fuel poverty or struggling to heat their homes, whilst increased internet access would reduce isolation. Regeneration of urban areas might address land, air and noise pollution, whilst investment in water, waste and sustainable transport could have additional health benefits.</p>	<p>The measures will have strong benefits for the health of those currently in fuel poverty or struggling to heat their homes, whilst internet access will reduce isolation. Regeneration of urban areas may also address land, air and noise pollution.</p>	<p>People's health and wellbeing will improve to an enhanced living and working environment, increased access to greenspace and walking/cycling routes, and potentially from increased access to IT networks.</p>
4. Soil	<p>Soil is unlikely to be affected though continued funding of activities in the 2007-2013 ROP.</p>	<p>Existing trends will continue.</p>	<p>Improving the urban environment could benefit soil. However disturbance and soil sealing, as well as damage to bedrock in certain areas could occur through broadband installation and business growth if new premises are required.</p>	<p>Decontamination of brownfield sites will benefit soil. However disturbance and soil sealing, as well as damage to bedrock in certain areas could occur through broadband installation and business growth if new premises are required.</p>	<p>Soil may benefit from regeneration of brownfield sites and creation of green infrastructure, a possibly indirectly through greening of supply chains though broadband installation could adversely affect soils and bedrock.</p>

SEA OBJECTIVES	ALTERNATIVES				
	1	2	3	4	5
	Continue with ROP 2007-2013	Do Nothing	Outline Draft Proposals as at November 2013	Detailed Draft Proposals as at May 2014	Ecosystems Services Approach
5. Water	<p>Water resources and water quality would benefit significantly from investment in conservation, source protection and sewerage and treatment facilities.</p>	<p>Water and waste-water facilities may not meet future demand, particularly in growth areas.</p>	<p>Water resources would strongly benefit from investment in the sector, whilst strategic research relating to marine environment could benefit water if the environmental objectives of 'Harnessing our Ocean Wealth' are met. However, water quality could possibly be affected by contaminated run-off or sedimentation due to broadband installation and business growth if new premises are required, whilst the latter will also reduce the permeability of soil.</p>	<p>Strategic research relating to marine environment may benefit water assuming the environmental objectives of 'Harnessing our Ocean Wealth' are met. However, water quality could possibly be affected by contaminated run-off or sedimentation due to broadband installation and business growth if new premises are required, whilst the latter will also reduce the permeability of soil.</p>	<p>Water quality will benefit greatly from improvements to wastewater infrastructure; creation of green infrastructure and SuD will improve drainage; quality of run-off, whilst environmental training SMEs should improve water efficiency and thus reduce pressure on water resources.</p>

SEA OBJECTIVES	ALTERNATIVES							
	1	2	3	4	5			
	Continue with ROP 2007-2013	Do Nothing	Outline Draft Proposals as at November 2013	Detailed Draft Proposals as at May 2014	Ecosystems Services Approach			
6. Air	+ / -	Air quality in Ireland is generally very good and is good in urban as well as rural areas. However the population is growing and there is a high reliance on private vehicles which would be likely to continue without efforts to reduce car usage.	+ / -	Improvements to urban areas and investment in the waste sector could help address existing air pollution problems, whilst sustainable transport measures would reduce NOx and PM10 emissions. However business growth may result in more travel related emissions, whilst broadband installation and any new business premises would have temporary construction effects.	+ / -	Regeneration of urban areas may address existing air pollution problems, however business growth may result in more travel related emissions, whilst broadband installation and any new business premises would have temporary construction effects.	+ / -	Environmental training and green procurement SMEs should reduce the incidence of polluting emissions, as will promotion of walking/cycling and public transport; creation of green infrastructure and street trees may help to screen and minimise the effects of air pollution in urban areas.

SEA OBJECTIVES	ALTERNATIVES				
	1	2	3	4	5
	Continue with ROP 2007-2013	Do Nothing	Outline Draft Proposals as at November 2013	Detailed Draft Proposals as at May 2014	Ecosystems Services Approach
7. Climate	<p>Climate would benefit from investment in public transport and renewable energy assuming that this resulted in a reduction in CO2 emissions, however key linking routes would be likely to increase travel by private car. Water conservation would also be beneficial in minimising possible future droughts and water shortages.</p> <p>+ / -</p>	<p>Greenhouse gas emissions have risen significantly since 2000. If no action is taken to reduce emissions, e.g. through improving energy efficiency of buildings or encouraging sustainable transport options, this trend will continue. Without the funding of climate adaptation measures, urban and rural areas will find themselves increasingly susceptible to the effects of heat waves, storms and flooding.</p> <p>-</p>	<p>Whilst increased access to the internet may reduce the need to travel, it may also result in an increase in demand for ICT equipment, thus increasing emissions during production. Business growth may also result in more travel related emissions. Enhancing urban areas may have beneficial effects however, whilst this is certainly the case for improving energy efficiency in housing. In addition, carbon emissions would reduce from increased renewable energy initiatives, energy efficiency in SMEs, smart distribution systems and a shift to a low carbon economy.</p> <p>+</p>	<p>Whilst increased access to the internet may reduce the need to travel, it may also result in an increase in demand for ICT equipment, thus increasing emissions during production. Business growth may also result in more travel related emissions. Regeneration of urban areas may have beneficial effects however, whilst this is certainly the case for improving energy efficiency in housing.</p> <p>+ / -</p>	<p>Carbon emissions will lower overall due to the use of renewable energy for heating homes; the use of ICT equipment, environmental training and green procurement SMEs; and most importantly for the increased use of footpaths, cycle routes and public transport for travel. Adaptation to climate change will be addressed by use of green infrastructure and SuDS in urban and rural centres.</p> <p>+ +</p>

SEA OBJECTIVES	ALTERNATIVES				
	1	2	3	4	5
	Continue with ROP 2007-2013	Do Nothing	Outline Draft Proposals as at November 2013	Detailed Draft Proposals as at May 2014	Ecosystems Services Approach
8. Material Assets	<p>+</p> <p>Investment in the water, waste and renewable energy sectors should reduce unsustainable use of natural resources and minimise waste, whilst urban regeneration will maximise use of the existing built environment.</p>	<p>0</p> <p>Existing trends will continue.</p>	<p>+</p> <p>Improving energy efficiency in SMEs, public sector buildings and housing would substantially reduce energy (heat) wastage, whilst funding for renewable energy would reduce pressure on non-renewable resources. In addition, urban regeneration would maximise use of the existing built environment.</p>	<p>+</p> <p>Improving the energy efficiency of the housing stock will substantially reduce energy (heat) wastage through walls and roofs, whilst urban regeneration will maximise use of the existing built environment.</p>	<p>+</p> <p>+</p> <p>The Green Innovation Ecosystem, the re-use of ICT equipment, environmental training and green procurement for SMEs, the green heat fund, and investment in the water sector should reduce unsustainable use of natural resources and minimise waste, whilst green urban regeneration will maximise use of the existing built environment.</p>

SEA OBJECTIVES	ALTERNATIVES				
	1	2	3	4	5
	Continue with ROP 2007-2013	Do Nothing	Outline Draft Proposals as at November 2013	Detailed Draft Proposals as at May 2014	Ecosystems Services Approach
9. Cultural Heritage	<p>+</p> <p>Cultural heritage is unlikely to be affected, except through specific investment through Priority Axis 2e.</p>	<p>0</p> <p>Existing trends will continue.</p>	<p>+ / -</p> <p>Improvements to the urban environment could include cultural heritage benefits, whilst increasing accessibility to cultural heritage assets would increase understanding and enjoyment. Broadband installation could affect both underground and over ground archaeology/cultural heritage assets, as could business growth if new facilities are required.</p>	<p>+ / -</p> <p>Urban regeneration may enhance the quality and diversity of cultural heritage, whilst retrofitting vacant social housing will enhance the townscape through a reduction in boarded up properties and anti-social behaviour. Broadband installation could affect both underground and over ground archaeology/cultural heritage assets, as could business growth if new facilities are required.</p>	<p>0</p> <p>Cultural heritage may benefit from green urban regeneration, though could be adversely affected by broadband installation if appropriate design-stage surveys are not carried out.</p>
10. Landscape	<p>+ / -</p> <p>Landscape and visual amenity could benefit indirectly through investment in natural and cultural heritage and urban regeneration, however broadband, renewable energy and road infrastructure could have adverse effects.</p>	<p>0</p> <p>Existing trends will continue.</p>	<p>+ / -</p> <p>The landscape could be adversely affected by above ground broadband cables and masts, whilst business growth could also potentially affect the landscape if new facilities are required. The greatest concern would be the installation of renewable energy, particularly wind.</p>	<p>+ / -</p> <p>The landscape could be adversely affected by above ground broadband cables and masts, whilst business growth could also potentially affect the landscape if new facilities are required.</p>	<p>0</p> <p>Landscape may benefit from green urban regeneration, though could be adversely affected by broadband installation if appropriate design-stage surveys are not carried out.</p>

SEA OBJECTIVES	ALTERNATIVES				
	1	2	3	4	5
	Continue with ROP 2007-2013	Do Nothing	Outline Draft Proposals as at November 2013	Detailed Draft Proposals as at May 2014	Ecosystems Services Approach
11. GI & ES	0 Green infrastructure and ecosystem services could possibly benefit indirectly through investment in natural and cultural heritage (Priority Axis 2e).	0 Existing trends will continue.	+ / - Strategic research relating to marine environment could benefit ecosystem services if the environmental objectives of 'Harnessing our Ocean Wealth' are met. Improving the urban environment and investment in the water sector could potentially benefit ecosystem services, but this would depend on whether the funding goes towards socio-economic or environmental objectives.	+ / - Strategic research relating to marine environment may benefit ecosystem services assuming the environmental objectives of 'Harnessing our Ocean Wealth' are met. Urban regeneration could benefit ecosystem services if environmental enhancement or rehabilitation of natural/cultural heritage options are funded, however socio-economic options could reduce the ability of an area to provide ecosystem services.	+ + Environmental awareness will improve across the research and business sectors through the Green Innovation Ecosystem and environmental training and green procurement in SMEs. Investment in the water sector will improve aquatic ecosystems, whilst promotion of walking and cycling routes will encourage use of outdoors. Creation and enhancement of green infrastructure and SuD through urban regeneration will also improve natural linkages and the ability of urban areas to provide ecosystem services.

- 4.3.2. As can be seen in Table 4.1, the 'do nothing' alternative performed the worst for both environmental and socio-economic objectives due to the existing problems that the BMW ROP has been, and continues to, help to address, particularly regarding employment and access to the internet. Alternatives 1 (continue with ROP 2007-2013), 3 (November 2013 outline draft) and 4 (May 2014 detailed draft) performed similarly against most of the SEA Objectives and are generally positive. The funding for water sector related projects in 2007-2013 will not be carried forward in 2014-2020, so the impact on this SEA objective is less favourable for options 3 and 4. Of the three, there was most potential for climate related benefits under alternative 3 due to the potential inclusion of numerous energy efficiency and renewable energy projects.
- 4.3.3. There are additional viability issues with Alternative 1 because it is not possible to directly lift a programme developed under the 2007-2013 Regulations and implement it under 2014-2020 Regulations. In addition, the total public contribution to the 2007-2013 Programme was €457.5m, funded by the EU, the Irish Government and through third party investment, whilst for 2014-2020 this is expected to be reduced to €320m. However the types of projects funded are still relevant to the 2014-2020 periods.
- 4.3.4. Alternative 5 (ecosystems services approach) put an environmental (and to a lesser extent a social) emphasis onto the possible priorities to be funded under the chosen Thematic Objectives. Notable differences to the proposals for the ROP 2014-2020 set out in May 2014 (alternative 4, and to a lesser extent alternative 3) were the stronger beneficial impacts on:
- Health and wellbeing, due to the increase in green infrastructure, walking and cycling;
 - Water, due to the investment in waste water infrastructure, sustainable drainage (SuDS) and environmental training of SME managers;



- Climate (and to a lesser extent air quality), due to the increased focus on environmental training, green procurement, green infrastructure, SuDS, and walking and cycling; and
- Green infrastructure and ecosystem services, due to increased environmental awareness from research and environmental training, investment in the water sector, green infrastructure, SuDS, and walking and cycling.

4.4. Reason for Choice of Preferred Strategy

- 4.4.1. The option BMW has chosen to take forward to public consultation is Alternative 4, even though Alternative 5 performs better environmentally. This is because the BMW ROP is intended to focus first on facilitating business growth and jobs, with an overall aim of sustainability. Certain needs have to be prioritised over others to ensure that the limited funding is not spread too thinly so as to be ineffective.
- 4.4.2. Alternatives 1, 3 and 5 have nevertheless fed into recommendations made for enhancing the drafting of the BMW ROP (see Section 2 of the SEA Statement).



5. MONITORING MEASURES

5.1.1. Article 10 of the SEA Directive requires BMW, as the Managing Authority, to monitor significant environmental effects of implementing the BMW ROP. This must be done in such a way as to also identify unforeseen adverse effects and to take appropriate remedial action; though for this purpose, existing monitoring arrangements may be used, if appropriate, with a view to avoiding duplication. 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.

5.1.2. It is important that any monitoring proposed by the SEA should aim to specifically monitor the impact of the BMW ROP rather than monitoring trends in the baseline environment that would have occurred regardless of the BMW ROP. In accordance with the Ireland SEA Regulations, monitoring should also focus on aspects of the BMW ROP where environmental impacts are predicted to be significant

5.1.3. However, the SEA did not predict any significant adverse effects of the BMW ROP being implemented. As revealed in Section 6.4 of the ER, residual environmental effects of the BMW ROP (i.e. after mitigation measures have been adopted) are unlikely to be of greater than negligible to minor significance. Monitoring is therefore only a requisite to identify at an early stage unforeseen adverse effects arising from the Programme.

5.1.4. BMW has agreed to a monitoring programme. This has the aim of identifying any potential unforeseen adverse effects should they arise, as well as allowing BMW to track the environmental achievement of their ROP. The indicators which BMW has agreed to monitor are:

- The level of reduced energy demand in retrofitted housing;
- The number of urban development projects and their environmental outcomes;



- The number of SMEs supported in the environmental services sector;
- The number of research projects funded with an environmental sustainability focus; and
- The length of cable passing through SPAs, SACs, and NHAs, and the number of sites affected (only if new infrastructure is required).

5.1.5. Precise details regarding the data collection, data assimilation, and reporting of the results of the monitoring programme will be subject to agreements with Intermediary Bodies which would apply for funding from the ROP, as well as agreements with the Southern And Eastern Regional Assembly (“S&E”), which has also prepared an equivalent ROP. Some suggestions for what data should be assimilated, by whom and how frequently were provided in Appendix F of the ER.



