

## Appendix A SEA Scoping Consultation Responses

Comment number	Submission comment	Theme	Documents	Action/Response
<b>Environmental Protection Agency (EPA)</b>				
1.	Priority areas, investment in wastewater, investment in drinking water: WSSP 2050 must consider how these issues will be resolved.	Drinking water Wastewater	Draft WSSP2050	Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b>
2	The WSSP 2050 should be aligned with the review of the National Planning Framework, currently underway. Uisce Éireann must consider investment in capacity for wastewater and drinking water infrastructure that is consistent with planning development. Uisce Éireann should engage with Department of Housing, Local Government and Heritage in terms of strategic management for capacity related to new housing developments.	Drinking water Wastewater	Draft WSSP2050	Addressed in draft WSSP 2050 as discussed in <b>draft WSSP2050 Appendix V</b>
3	<p>1. Integration of the SEA and WSSP2050 should reflect the overall objective of the SEA directive “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes”.</p> <p>It is key that the SEA acknowledges the complex and cross cutting nature of climate, water quality and quantity, environment and health issues and recognises the need for appropriate targets and measures in the plan, that can contribute to being part of an integrated approach to the provision of adequate wastewater and drinking water services.</p>	Drinking water Wastewater	Draft WSSP2050 /SEA	<p>Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b></p> <p>The Plan commits to the implementation of the Strategic Environmental Assessment (SEA) Environmental Action Plan (EAP) and Monitoring plan, and this will be undertaken as an integrated part of the monitoring and feedback steps outlined in <b>draft WSSP 2050 Section 9 and 10.</b></p> <p>The monitoring plan references and takes account of good practice outlined in ‘Tiering of Environmental Assessment – The influence of</p>

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				<p>SEA on Project-level Environmental Impact Assessment' (EPA, 2021d), Guidance on Strategic Environmental Assessment Statements and Monitoring (EPA, 2023a). The SEA acknowledges the complex and crosscutting nature of the environmental topics, as addressed in <b>SEA ER Section 5.8</b> on interrelated SEA topics</p>
4.	<p>2. All recommendations from the SEA and AA processes should be integrated into the plan. The WSSP2050 should include a chapter outlining how the recommendations and mitigations measures from the SEA have been incorporated into the plan. A summary table with key findings from the SEA should be included.</p>	<p>Key findings – Recommendations and mitigation measures</p>	<p>WSSP2050</p>	<p>The Plan commits to the implementation of the Strategic Environmental Assessment (SEA) Environmental Action Plan (EAP) and Monitoring plan, and this will be undertaken as an integrated part of the monitoring and feedback steps outlined in <b>draft WSSP 2050 - Section 9 and 10</b> of the Plan. A summary table with key findings from the SEA is included in the Plan.</p> <p>Action the recommended sections.</p>
5.	<p>In relation to public engagement, it would be useful to engage with the research team in University College Dublin who are undertaking a research project – Public participation and performance criteria in Strategic Environmental Assessment: The Way Forward to Advancing Practice (SEAWAY). The research involved a review of international literature on good public engagement practice, national/international interviews with SEA practitioners, planners and participation experts, an international online survey and pilot testing novel participative approaches to SEA with local authorities. Dr Ainhua</p>	<p>Public engagement - collaboration</p>	<p>SEA</p>	<p>Collaboration/Noted. UCD have reached out in relation to this and are in discussion with relevant Uisce Éireann personnel.</p> <p>Project Team reviewed the consultation approach for the Offshore Renewable Energy Development Plan but approach is not considered suitable for this high level plan and SEA and the focus has been on provision of graphic design and clear presentation. The use of digital approaches to support engagement will be considered for the downstream actions identified in the plan</p>

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	<p>González in UCD is the lead researcher for the project (Ainhoa.gonzalez@ucd.ie).</p> <p>Further, the recent public consultation for the SEA environmental report and draft Offshore Renewable Energy Development Plan II used an interactive approach that may be informative for Uisce Éireann in your public consultation with the draft Plan.</p>			<p>where appropriate especially where mapping support is required and specific investment options are considered.</p>
6.	<p>The SEA objectives, included in Section 5 SEA Methodology of the scoping report, should include stronger commitments to action. The SEA objectives should be revised to contain more concise and definitive wording. For example, the SEA objective relating to water environment states, “....Contribute towards the “no deterioration” WFD condition and, where possible, to restore and improve waterbody status for rivers, lakes, .....” . It is a legal requirement of the Water Framework Directive to restore and improve water quality. This SEA objective, and others with similar wording, should be reviewed to contain more concise and definitive wording.</p>	SEA Objectives	SEA	<p>Amendment: SEA objectives have been updated to address comments.</p>
7.	<p>The European Environment Agency have recently published research into the development of horizon scanning tools that may provide further assistance to Uisce Éireann in quantifying the effects of the WSSP 2050 on a medium to long term basis. The output from the research is “Horizon Scanning – Tips and Tricks: A practical guide”.</p> <p>The SEA Environmental Report should refer to the full range of effects and of the area likely to be affected.</p>	Assessment - Effects	SEA	<p>Horizon scanning has been included as an action in the draft WSSP 2050</p> <p>Clarification: The SEA Environment report assessment refers to the EPA’s Good Practice Guidance on Cumulative Effects Assessment in Strategic Environmental Assessment (EPA, 2020b) as key guidance in <b>Section 6</b> of the SEA Environmental Report. The SEA Environmental Report addresses potential cumulative effects</p>

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	<p>This assessment should consider the duration and frequency of effects as well as short, medium and long-term, cumulative and synergistic effects of the plan. The EPA's Good Practice Guidance on Cumulative Effects Assessment in Strategic Environmental Assessment (EPA, 2020).</p>			<p>across plan areas, identifying cumulative and/or negatively synergistic impacts in the Plan, and also sets out commitments for further investigation at lower tier plan and project level and for monitoring effects, including potential cumulative effects.</p> <p>The SEA assessment identifies the high nature of the plan and its implementation though</p>
8.	<p>Section 4 and App B should include:</p> <ul style="list-style-type: none"> <li>• Offshore Renewable Energy Development Plan II (draft underway)</li> <li>• Dumping at Sea Act, as amended.</li> <li>• Zero Pollution Action Plan</li> <li>• Forest Strategy Implementation Plan 2023-2027</li> <li>• Industrial Emissions Directive and its transposing legislation</li> <li>• Kyiv (SEA) Protocol</li> <li>• European Climate Law</li> </ul>	PPP <sup>1</sup>	SEA	<p>All have been included in the PPP review and have been added to <b>Appendix B</b> including: draft Offshore Renewable Energy Development Plan II, Dumping at Sea Act Revised, Zero Pollution Action Plan, Forest Strategy 2023-2030, Environmental Protection Agency (Designated Development) (Industrial Emissions) (Licensing) Regulations 2023, Kyiv (SEA) Protocol and the European Climate Law</p>
9.	<p>The EPA publication on Developing and Assessing Alternatives in SEA should be of assistance in determining possible approaches to considering alternatives. There is merit in reviewing the alternatives considered for the previous iteration of the plan, to determine if they could be helpful in informing the consideration and selection of alternatives associated with the SEA for the WSSP 2050.</p>	Assessment - Alternatives	SEA	<p>The EPA's 'Developing and Assessing Alternatives in SEA' (EPA, 2015) has been considered in the SEA. <b>Section 6</b> of the SEA Environmental report includes the report as key guidance to be considered.</p> <p>Clarification. The previous approach to alternatives was reviewed as a starting point and this focussed on a 'successional plan' which was essentially a without the WSSP</p>

<sup>1</sup> Relevant Policies, Plans and Programs

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				<p>case. This is taken into account in effect for this plan as the Business as Usual or continuation of current practice without the WSSP 2050. The approach taken has considered alternatives in more detail taking on board the EPA guidance and considering possible alternatives for each action to determine reasonable alternatives rather than just at a whole plan scale. The aim has been to look to improve and add to the development of the draft WSSP 2050 proposals.</p>
10.	<p>Scope of SEA: Where it is envisaged that measures proposed in the WSSP 2050 will be implemented via other plans, which themselves have been or will be subject to SEA, this should be explained in the Environmental Report and taken into account in the assessment.</p> <p>Where specific measures will be implemented directly, further detail should be provided in the Environmental Report and WSSP 2050 on the relevant environmental assessments to be carried out at the project stage and relevant mitigation measures to be applied, as appropriate. There may be merit in exploring this issue further with the relevant Environmental Authorities during the preparation of the WSSP 2050 and SEA environmental report.</p>	Mitigation measures	SEA	<p>Clarification. For each action proposed consideration is given to how it will be implemented and where lower tier plans are required and whether these have been or will be subject to SEA/AA and project level environmental assessments</p>
11.	<p>Transboundary consultation: Transboundary consultation should be undertaken with environmental authorities in Northern Ireland where the potential for likely significant transboundary effects have been</p>	Transboundary impacts	SEA	<p>Clarification. As there is the potential to interface with Northern Ireland and the possibility of transboundary impacts, the SEA Environmental report will be issued to</p>

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	identified. In this regard, the relevant requirements of the SEA protocol <sup>1</sup> under the ESPOO Convention should be considered, for any possible transboundary consultations with non-EU Member States.			Northern Ireland’s Department of Agriculture, Environment and Rural Affairs (DAERA) for consultation on transboundary environmental effects.
12.	Data & Knowledge Gaps: The WSSP 2050 should identify any significant data and knowledge gaps, including commitments to address these on a priority basis and where relevant, in association with other organisations/government departments, during the implementation phase of the plan. This is with a view to strengthening the evidence base for future reviews and iterations of the plan.	Data and Knowledge gaps	WSSP2050	Clarification. Data gaps are acknowledged at a high level and key gaps addressed through the actions proposed.  Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b>
13.	Monitoring, Implementation & Reporting: The SEA environmental report should include a description of the measures envisaged concerning monitoring. The WSSP 2050 should include a commitment to implement SEA related environmental monitoring requirements and the associated reporting.  The WSSP 2050 should include a commitment to implement the SEA environmental monitoring programme and associated reporting. We suggest including a separate section on ‘Monitoring, Implementation and Reporting’ in the plan, setting out the provisions for monitoring and reporting on the implementation of the plan.  To avoid duplication in data collection, the same indicators should be used for the plan-related and SEA-related monitoring aspects where possible.	Mitigation and monitoring	WSSP2050 /SEA	Clarification. The Plan commits to the implementation of the Strategic Environmental Assessment (SEA) and Implementation and Monitoring Plan, and this will be undertaken as an integrated part of the monitoring and feedback steps as outlined in <b>Sections 10 and 11 of the draft WSSP 2050</b> .  The monitoring plan and a description of the measures involved are included in <b>Section 9</b> of the SEA Environment Report.

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14.	Integration with other key Plans and Programmes: We recommend including schematics in both the plan and SEA Environmental Report, showing the links and key inter-relationships with other key relevant national, regional, sectoral and environmental plans e.g National Planning Framework, etc. This will clearly show the interlinkages between the key national policies and plans relating to water, agricultural and the environment.	Integration with other key Plans and Programmes	WSSP2050/SEA	Amend. An updated schematic of interactions between plans in the Plan and assessment documents.  A comprehensive list of relevant policies, plans and programmes is provided in <b>Appendix B of the SEA Environmental report</b> . The key legislation, policies and plans that need to be taken into account in the WSSP 2050 and the environmental assessment are considered in <b>Section 4 of the SEA Environmental report</b> .
<b>Meath County Council</b>				
15.	<u>Consider the National Planning Framework, National Strategic Outcome 9</u> : “A new long-term water supply source for the Eastern and Midland Region, which includes the Dublin Water Supply Area (DWSA), is needed by the mid-2020s, to provide for projected growth up to 2050 and contribute to resilience and security of supply for the region” and “Increase compliance with the requirements of the Urban WW Directive from 39%% today to 90% by the end of 2021, to 99% by 2027 and to 100% by 2040” (p148).	Integration with other key Plans and Programmes	WSSP2050	Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b>  Specific projects related to meeting demand will be covered in Tier 2 plans.
16.	<u>Consider the Eastern and Midlands Regional Assembly Regional Spatial and Economic Strategy</u> : RPO6.17, RPO7.10, RPO7.11, RPO7.12, RPO10.4, RPO10.6, RPO10.8, RPO10.9, RPO10.10	Integration with Eastern and Midlands Regional Assembly Regional Spatial and Economic Strategy	WSSP2050	The document referred to has a regional focus and would therefore be covered in Tier 2 plans as covered in <b>draft WSSP 2050 Appendix C</b>

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17.	<u>Consider the Meath County Development Plan 2021 – 2027</u> : “To develop, protect, improve and extend water, wastewater, surface water and flood alleviation services throughout the County and to prioritise the provision of water services infrastructure to sustain and complement the overall strategy for socio-economic and population growth and to achieve improved environmental protection. These service improvements must be considered in the context of addressing the causes of climate change through reducing reliance on fossil fuels and reducing greenhouse gas emissions. Achievement of these environmental imperatives can only be guaranteed by means of effective and ambitious action across all sectors which will require demonstrable behavioural change in our society.”	Integration with Meath County Development Plan 2021 – 2027 – water service infrastructure in climate change context	WSSP2050	The document referred to has a regional focus and would therefore be covered in Tier 2 plans as covered in <b>draft WSSP 2050 Appendix C</b>
18.	<u>Consider INF POL 1</u> : “To liaise and work in conjunction with Irish Water in the development and upgrade of water supply systems to ensure that the County has an adequate, sustainable and economic supply of suitable quality piped water for all users”.	Integration with INF POL 1 – drinking water supply	WSSP2050	The document referred to has a regional focus and would therefore be covered in Tier 2 plans as covered in <b>draft WSSP 2050 Appendix C</b> .
19.	<u>Consider INF POL 11</u> : “To liaise and work in conjunction with Irish Water during the lifetime of the Plan in the provision, upgrading or extension of wastewater collection and treatment systems in the County to serve existing and planned future populations and enterprise in accordance with the requirements of the Core and Settlement Strategies.”	Integration with INF POL 11 - wastewater	WSSP2050	The document referred to has a regional focus and would therefore be covered in Tier 2 plans as covered in <b>draft WSSP 2050 Appendix C</b>



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20.	Consider the use of the GSI datasets in the SEA process. List of Geoheritage, Groundwater, Geological Mapping, Geohazards, Natural Resources, Geochemistry of soils, surface waters and sediments, historic mines, physiography units.	GSI datasets	All	The document referred to has a regional focus and would therefore be covered in Tier 2 plans as covered in <b>draft WSSP 2050 Appendix C</b>
<b>Eastern and Midland Regional Assembly</b>				
21.	Acknowledge that UE is obliged under the Climate Action Plan 2023 to achieve a 51% reduction in CO2 emissions to be 50% energy efficient by 2030, and Net Zero by 2040.	Compliance – Climate Change targets	WSSP2050	The document referred to has a regional focus and would therefore be covered in Tier 2 plans as covered in <b>draft WSSP 2050 Appendix C</b>
22.	Acknowledge energy consumption associated with provision of water services	Energy	WSSP2050	Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b>
23.	Uisce Éireann should seek collaboration between relevant stakeholders to inform future solutions	Collaboration between relevant stakeholders	WSSP2050	Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b>
24.	Recently published circular economy related strategies and plans focus on water in the short term (2025 – 2030) and improving water use and waste avoiding in the medium term (2030 – 2040). Long-term (2040 – 2050) circular economy will focus on progressive advancements of technology.	Circular economy	WSSP2050	General statement. No action needed
25.	Increase compliance with Urban Wastewater Direction to 99% in 2027 and 100% by 2040.	Compliance with Urban Wastewater Direction	WSSP2050	Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b>
26.	The 7 issues appear appropriate, but UE should also consider: a. food security b. water supply during summer drought periods	Scenario section	Issues Paper / WSSP2050	Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b>

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	c. co-operation between RoI and NI due to the transboundary nature of the environment			
<b>Department of Agriculture, Food and the Marine</b>				
27.	It is therefore essential that the socio-economic reliance on the seafood sector is fully recognised and is factored into the Water Services Strategic Plan 2050 so as to minimise adverse impacts on employment and economic activity.	Socio-economic reliance	Issues Paper / WSSP2050	Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b>
28.	Department wishes to stress that commercial sea fishing and aquaculture are long standing, pre-existing and traditional activities in the marine environment. The evaluation of potential impacts of the Water Services Strategic Plan 2050 on seafood sector activities needs to be given consideration within the context of the requirements set out under the Maritime Area Planning Act and the National Marine Planning Framework.	Impact on seafood sector activities; compliance	SEA/AA	Clarification. The National Marine Planning Framework (NMPF) and the Marine Planning Act are considered key in setting the context for the SEA and the WSSP 2050. Both the NMPF and the Marine Planning Act are included in <b>Section 4.1.1 and Appendix B of the SEA Environment Report.</b>
29.	The document from BIM recommends that the National Strategic Plan for Sustainable Aquaculture Development should be included as part of the inter-plan cumulative assessment and should be considered in drafting the SEA.	Cumulative assessment	SEA/AA	Clarification. The Draft National Strategic Plan for Sustainable Aquaculture Development has been added to the PPP review (Appendix B) and will be considered as part of the inter-plan cumulative assessment.
30.	Consider the maintenance and protection of shellfish waters. Food security not included, considered as major failing of the plan. Need to account for wastewater treatment in shellfish protected areas.	Wastewater treatment impact in shellfish protected areas	WSSP2050 / SEA/AA	Clarification. The potential for water pollution from wastewater discharges to impact freshwater, estuarine and marine fisheries, including Shellfish Waters Protected Areas, has been considered as part of the baseline for the environmental assessment of the SEA (see <b>Section 5 of the SEA report, Section C.5</b> )

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				<p><b>of Appendix C</b>) and the Fisheries and Angling SEA Objective. Water quality is also taken into account in the Water Environment SEA objective which is important for the protection of Shellfish Water Protected Areas. This will be considered as part of the assessment.</p> <p>UE has a responsibility for water supply provision and wastewater treatment in supporting the economy, including agriculture and fisheries. Food security is considered a challenge within the baseline and has been considered in <b>Section C.3 of Appendix C</b>.</p>
31.	<p>Include the Marine Strategy Framework Directive 2008/56/EC as a key legislative driver</p>	<p>Marine Strategy Framework Directive 2008/56/EC - key legislative driver</p>	<p>Issues Paper / WSSP2050</p>	<p>Clarification. The Marine Strategy Framework Directive (MSFD) Directive 2008/56/EC is included in <b>Section C.1.2 of Appendix C</b> and has been added to <b>Section 4.1.1 of the SEA Environmental Report and Section C.1.1 and C.1.5 of Appendix C</b>.</p>
32.	<p>The conflation of Fisheries and Angling in section 3.12. The water quality concerns and implications for these sectors are very different and thus warrant separate consideration both in the baseline and in the future SEA.</p> <p>SEA Scoping report should also consider the water quality concerns for the Fisheries and Angling:</p> <ul style="list-style-type: none"> <li>- All sea-fishing is managed under the Common Fisheries Policy (CFP), including inshore fishing.</li> <li>- In Ireland, inshore fishing is considered to be the fishing of non-quota fish stocks by sea-fishing boats</li> </ul>	<p>Water quality concerns for the Fisheries and Angling</p>	<p>SEA</p>	<p>Clarification. The EU's common fisheries policy has been added to the PPP review (<b>Appendix B</b>) and the baseline text in <b>Appendix C Section C.5</b> has been clarified to reflect the jurisdictional boundaries associated with fisheries and angling.</p> <p>Fisheries and Angling has been separated out under separate sub-headings to capture the implications for commercial fishing and aquaculture with angling included with recreation.</p>

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	less than 12m in overall length within 6nm of the baselines. Such fishing is managed by the Minister for Agriculture, Food and the Marine. - IFI is responsible for inland fishing, including on rivers, lakes and streams, but not in coastal waters, even though they have a coastal 12-mile jurisdictional limit			
<b>Bord Iascaigh Mhara</b>				
33.	Looking at the issues that can be addressed through the 4 key themes we regard the omission of Food security considerations from Theme 2 - Protect and restore our environment and Theme 3 - Support our customers, communities and the economy as a major failing of the plan.	Food security considerations	Issues Paper / WSSP2050	Clarification. The themes relate to action for Uisce Éireann to take so food security would not be appropriate as a theme as discussed in <b>draft WSSP 2050 Appendix C.</b>
34.	This strategic plan must align to the Farm to Fork Strategy	Aligning to the Farm to Fork Strategy - compliance	Issues Paper / WSSP2050	Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b>
35.	We regard the omission if the Marine Strategy Framework Directive (MSFD) Directive 2008/56/EC as a key legislative driver that should be considered	Completion of legislation section	Issues Paper / WSSP2050	Clarification. The Marine Strategy Framework Directive (MSFD) Directive 2008/56/EC is already included in <b>Section C.1.2 of Appendix C</b> and has been added to <b>Section 4.1.1 of the SEA Environmental Report and Section C.1.1 and C.1.5 of Appendix C.</b> Include in legislation section.
36.	Include shellfish waters from section 3.8 for the SEA. Also needs to be included in Appendix C.	Completions of Appendix C	SEA	Clarification. Shellfish Waters are included in <b>Section C.5.1 and Figure C.20 (Appendix C).</b> A list of the Shellfish Waters in Ireland has been added to <b>Appendix D.</b>

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37.	Include Seafood as a contributing factor to Ireland's tourism in section 3.9.5 of the SEA.	Completions	SEA	Clarification. Reference to seafood tourism, specifically the Taste the Atlantic trail, has been added to the tourism baseline <b>(Appendix C, Section C.2.5)</b> .
38.	Fisheries and Angling should be kept as separate sectors.	Document structure	SEA	Amendment The EU's common fisheries policy has been added to the PPP review <b>(Appendix B)</b> and the baseline text <b>in Appendix C Section C.5</b> has been clarified to reflect the jurisdictional boundaries associated with fisheries and angling.  Fisheries and Angling has been separated out to capture the implications for commercial fishing and aquaculture under the fisheries topic and angling under recreation.
39.	Challenges in section 3.12.3 are understated, suggest "The key challenges and opportunities in relation to Fishing and Angling are: • Potential for the operation of wastewater treatment plants to cause hazard to human health and undermine commercial shellfish fisheries and aquaculture and affect freshwater or estuarine or marine water quality, fish stock and related livelihoods or recreation and tourism."	Challenges and opportunities in relation to Fishing and Angling	SEA	Clarification and amendment made.
40.	National Strategic Plan for Aquaculture Development should be included as part of the inter-plan cumulative assessment.	Cumulative assessment	SEA	Amendment. The Draft National Strategic Plan for Sustainable Aquaculture Development has been added to the PPP review (Appendix B) and will be considered as part of the inter-plan cumulative assessment.

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41.	Climate Change Issue: Need to include the impact of temperature, reduced precipitation, and sea level rise.	Climate change	Issues paper	Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b>
42.	Awareness and Behaviour: Include water scarcity, water efficiency and a bottom-up understanding of water in this issue.	Climate change	Issues paper	Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b>
43.	New issues: a. Population Growth b. Transparency and Trust	New issues to be included	Issues paper/ WSSP2050	Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b>
<b>Historic Environment Division</b>				
44.	Table 3.24 should clarify that not all recorded heritage assets on the Site and Monument records are 'designated'.	Heritage assets and Monument records	SEA	Clarification. <b>Section C.8 of Appendix C</b> has been updated to clarify that not all sites included in the Sites and Monuments Record are designated. Further clarification has also been included in <b>Section C.12</b> .
45.	App B should be clarified as follows: a. International (include) i. Convention for the Protection of the Architectural Heritage of Europe (Granada, 1985) ii. Convention for the Protection of the Archaeological Heritage of Europe (revised) (Valletta, 1992) b. Transboundary i. Protection of Wrecks Act 1973 – provides protection for designated shipwrecks. CH relationship should be noted in the table 'Conservation Principles' Guidance for the sustainable management of the historic environment in Northern Ireland <a href="https://www.communities[1]ni.gov.uk/sites/default/files">https://www.communities[1]ni.gov.uk/sites/default/files</a>	Conservation and protection of historic environment	SEA	Amendment. The Convention for the Protection of the Architectural Heritage of Europe (Granada, 1985) and the Convention for the Protection of the Archaeological Heritage of Europe (revised) (Valletta, 1992) has been added to the PPP review ( <b>Appendix B</b> ). The Protection of Wrecks Act 1973 is included in <b>Appendix B</b> .

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	/publications/communities/dfc-conversation-principles[1]guidance-sustainable-management.pdf			
<b>Department for Housing, Local Government and Heritage</b>				
46.	Though not yet fully commenced the Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023 has been signed into law; references to this legislation should be updated to reflect this throughout.	Updated legislation	SEA	Clarification. The Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023 has been updated in the PPP review ( <b>Appendix B</b> ).
47.	Table 3.1 should include: <ul style="list-style-type: none"> <li>· Direct impacts (removal) of terrestrial and underwater archaeological sites, features and artefacts, both previously known and unknown</li> <li>· Impacts to the settings of archaeological and cultural heritage sites</li> </ul>	Impact on archaeological and cultural heritage	SEA	Clarification. Direct impacts (removal) of terrestrial and underwater archaeological sites, features and artefacts, both previously known and unknown, and impacts to the settings of archaeological and cultural heritage sites have been added as potential environmental impacts to <b>Table 5.1</b> of the SEA Environment report.
48.	Underwater archaeological sites should not be incorporated with 'unknown archaeological sites' for the purposes of the SEA.	Underwater archaeological sites	SEA	Clarification. Underwater Archaeology and Unknown Archaeology have been separated for clarification (see <b>Section C.8.1 in Appendix C</b> ).
49.	Heading of table 3.10 should be changed as: County; Record of Monuments and Places; Sites and Monuments Record; National Inventory of Architectural Heritage.	Data presentation	SEA	Clarification. <b>Table C.16 ( previously 3.10)</b> has been corrected to reflect the sources of information included and the data has been updated to 2023. (Note: National monuments service column removed)
50.	The Department advises that in the 'Key Considerations for WSSP 2050 and the SEA' the challenges should	Key considerations on archaeological sites	SEA	Clarification. <b>Section C.8.4</b> has been clarified to specifically reference both terrestrial and

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	explicitly reference both terrestrial and underwater archaeological sites. Further while discovery/identification of previously unknown archaeological sites and artefacts may be considered an opportunity, in that it would add to our knowledge of the past, explicit reference to 'damage' should be omitted.			underwater sites and reference to damage from the Opportunities section has been removed.
51.	Table 3.26 should be revised as: Challenges: Infrastructure development and construction work can have impacts on cultural heritage and archaeology and architecture either through direct loss or impacts on their settings. River and coastal heritage structures and sites in particular. Abstraction affecting wetlands and <u>other waterbodies</u> can lead to loss of archaeological assets. Opportunities: Sensitive siting and construction of new infrastructure actions supporting <u>the enhancement of watercourses</u> , wetland and soil conservation could also help conserve archaeological interest.	Data presentation	SEA	Clarification. <b>Table C.25 (previously 3.26) (Appendix C)</b> has been updated with the suggested text.
<b>Inland Fisheries Ireland</b>				
52.	Items of priority for IFI to be considered: - Species Mortality - Habitat Loss/Fragmentation and Barriers to Movement - Disturbance - Changes in Water Quality - Changes in Hydrology - Hydrological	Impact assessment – on water and biodiversity	SEA	Clarification. The SEA Environmental report considers the types of WSSP related activities and potential environmental impacts that could occur in its assessment. <b>Table 5.1</b> provides a general summary of these potential impacts, including, Species Mortality, Habitat Loss/Fragmentation and Barriers to Movement, Disturbance, Changes in Water Quality, Changes in Hydrology, Transfer of Non-Native Species, Impacts on Aquatic



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	<ul style="list-style-type: none"> <li>- Transfer of Non-Native Species</li> <li>- Source protection</li> <li>- Water Treatment Plant Discharges</li> <li>- Funding Prioritisation</li> <li>- Wastewater Network Environment Compliance &amp; Sewer Flooding Investment Case</li> <li>- Aquatic Biological Diversity and Sustainable Planning</li> <li>- Water Abstractions</li> </ul>			Ecology, Water Treatment Plant Discharges and Water Abstractions.
<b>Commission for Regulation of Utilities</b>				
53.	Well planned and early consumer engagement with customers and relevant stakeholders on key issues such as infrastructure rollout, conservation and climate adaptation will be vital to deliver the objectives.	Early consumer engagement	WSSP2050	Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b>
54.	Improvements required in the availability and access to data and information and the collection and collation of robust data across its investments and knowledge base on assets health would merit strong emphasis in Uisce Éireann's WSSP 2050.	Improvements in availability and access to data	WSSP2050	Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b>
55.	The draft Water Service Policy Statement (WSPS) references three key objectives, namely (i) Availability and Reliability (ii) Safety & Quality (iii) Sustainability. It would be beneficial to ensure that these objectives align with Uisce Éireann's proposed WSSP 2050.	Objectives	WSSP2050	Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b>
56.	Need to consider the following items in the issues paper: a. Climate adaptation	Issues to be consider	Issues Paper	Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b>

Comment number	Submission comment	Theme	Documents	Action/Response
	<ul style="list-style-type: none"> <li>b. Changes in Ireland’s demographic over the next 25 years</li> <li>c. Water conservation</li> <li>d. Geopolitical activity</li> <li>e. Opportunity for UE as sole provider of services to many</li> <li>f. Sewer/water infrastructure misuse</li> <li>g. Energy demand and demand shifting</li> </ul>			
57.	Theme on “Support our customers, communities and the economy” should also cover the importance of clearly communication to customers and stakeholders alike.	Clearly communication	Issues Paper	Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b>
58.	Should consider the below in developing the WSSP: <ul style="list-style-type: none"> <li>a. Learning from international best practice</li> <li>b. Seeking further insights and learnings from providers of other essential services</li> <li>c. Increased levels of collaboration with the providers of other infrastructure to ensure efficiency for developers and end users.</li> </ul>	Issues to be consider	WSSP2050	Addressed in draft WSSP 2050 as discussed in <b>draft WSSP 2050 Appendix C</b>