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Northern Ireland Peatland Strategy - Delivery Plan

Strategic Environmental Assessment

Post-Adoption Statement

Final

P03

Prepared for

Natural Environment Policy Division, Department of Agriculture, Environment and Rural Affairs

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This report describes work commissioned by Natural Environment Policy Division, on behalf of Department of Agriculture, Environment and Rural Affairs, by an instruction dated 14 May 2025. The Client's representative for the contract was Ciara Brunty. Sheena Peat of JBA Consulting carried out this work.

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Contents

List of Tables

Abbreviations

DfC	Department for Communities
DAERA	Department of Agriculture, Environment and Rural Affairs
DCEE	Departments of Climate, Energy and the Environment
EIP	Environmental Improvement Plan
NEPD	National Environment Policy Division
NI	Northern Ireland
NPWS	National Parks and Wildlife Service
RoI	Republic of Ireland
SEA	Strategic Environmental Assessment

1 Introduction

1.1 Overview

The National Environment Policy Division (NEPD) of the Department of Agriculture, Environment and Rural Affairs (DAERA) has developed a Peatland Strategy for Northern Ireland to 2040, as part of the wider national strategy for tackling climate change and biodiversity loss. In order to deliver the objectives of the strategy, it is supported by the Delivery Plan for the Northern Ireland Peatland Strategy (hereafter 'the Delivery Plan') which includes measurable actions for achieving peatland restoration.

1.2 Background to NI Peatland Strategy Delivery Plan

An Environmental Improvement Plan (EIP) for Northern Ireland was published in 2024. This sets out effective interventions that are intended to improve the condition and quality of Northern Ireland's environment. The purpose of the EIP is to develop the nation's existing initiatives and lead in positive environmental direction at a national level. As an outcome of this plan, a wider range of strategies, action plans and programmes can be developed at local and regional scale, while considering the aims of the EIP. The EIP for Northern Ireland contains six strategic environmental outcomes, the third of which is subtitled 'Thriving, Resilient & Connected Nature & Wildlife'. Within Strategic Environmental Outcome 3, there is a target to publish a Northern Ireland Peatland Strategy "*to set the long-term vision for peatland protection, restoration & maintenance to 2040, which will assist in mitigating against climate change."* This has now been adopted and aims to restore the peatlands to a healthy, functioning ecosystem by 2050.

1.3 Strategic Environmental Assessment (SEA)

Strategic Environmental Assessment (SEA) is an iterative process that is required for the development of new plans, programmes and strategies that address environmental issues or areas for improvement. They allow for a formal approach of identifying, assessing and mitigating environmental effects usually at national or regional levels. The intention is that the SEA is fully integrated into the plan making process, where relevant, and therefore provides guidance for any environmental plans going forward. The SEA process is undertaken in accordance with the requirements of the SEA Regulations.

1.4 Requirements for the SEA Post-Adoption Statement

The SEA Regulations require several steps to be taken upon adoption of a plan or strategy (in this case the NI Peatland Strategy Delivery Plan). Specifically, post-adoption procedures for the SEA require that as soon as is reasonably practical after the adoption of a plan or strategy for which the SEA has been carried out, the planning authority must make a copy of the plan or strategy publicly available alongside a copy of the SEA report and a SEA

adoption statement and they must inform statutory consultation bodies about the availability of these documents. The SEA Adoption Statement must explain:

- How environmental (and sustainability) considerations have been integrated into the plan/strategy.
- How the Environmental Report has been considered during the preparation of the plan/strategy.
- How the opinions expressed during consultation on the plan and Environmental Report have been considered.
- How the results of any transboundary consultation entered into have been considered.
- The reasons for choosing the plan/strategy as adopted, in the light of other reasonable alternatives.
- The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the plan/strategy.

The remainder of this SEA post-adoption statement will detail how each of these requirements has been met.

2 How have environmental considerations been integrated into the North Ireland Peatland Strategy Delivery Plan?

JBA Consulting was appointed in May 2025 to undertake a SEA of the Northern Ireland Peatland Strategy Delivery Plan. The purpose of the SEA was to assist DAERA in preparing the Delivery Plan through identification of key relevant environmental and sustainability issues facing Northern Ireland and transboundary area and consider how the Delivery Plan could impact these issues. The purpose of the SEA is to ensure that potentially significant environmental impacts of the Delivery Plan's implementation were identified and avoided or mitigated during plan preparation.

The SEA was fully integrated into the development of the Delivery Plan. At each stage of Delivery Plan development, an assessment of sustainability and environmental effects of the measures included in the document was carried out. The assessment findings were reported in the SEA Environment Report, which was produced to show how SEA had influenced the Delivery Plan preparation process, describe the approach taken, consider alternative options to deliver the strategy and identify likely effects of the selected options, and put forward recommendations to avoid or minimise negative effects identified.

The way in which the environmental and sustainability effects of the Delivery Plan were described, analysed and compared was through the use of an SEA Framework, comprising a set of SEA objectives and assessment criteria. The SEA Framework and SEA objectives were developed during the scoping stage and were based on identified local environmental issues throughout Northern Ireland. These were outlined within the SEA Scoping Report which was issued to statutory consultees for review and comment. The SEA Framework and SEA objectives were further developed and amended in response to consultation responses received.

The SEA Framework comprised of SEA objectives that were used to decide on the potential effects of the Delivery Plan. The Framework is shown in Table 2-1. The SEA objectives provided the main tools at each stage of the SEA for assessing the objectives and measures in the Delivery Plan.

Table 2-1. SEA Framework Objectives for Peatland Delivery Plan.

Receptor	Objective
1. Landscape	Protect the integrity of national landscape character.
2. Biodiversity, flora and fauna	Maintain and enhance biodiversity, wildlife and habitat connectivity.
3 & 4. Water Environment	Protect and enhance the quality of water features and resources.
	Reduce the risk of flooding to existing communities and ensure no new developments are at increased risk.
5. Geology, soils and land use	Protect and enhance soil quality.
6. Historic Environment	Protect, conserve and enhance archaeological remains and other heritage assets and support the undertaking of archaeological investigations to understand and mitigate effects.
7. Material Assets	Safeguard compatibility with existing and proposed land use surrounding uses and functioning of infrastructure.
8. Population	Support the transition to diversified land management practices and improve ecosystem services.
9. Climatic Factors	Support sustainable restoration that is adapted or adaptable to climatic change.
10. Air Quality	Protect peatland habitats from exposure to atmospheric nitrogen deposition.

3 How has the Environment Report been considered?

The SEA methodology for the Northern Ireland Peatland Delivery Plan was informed by best practice guidance and was undertaken iteratively. It included five main stages and iterative tasks such that an assessment of sustainability and environment effects was carried out at multiple stages of the Delivery Plan development. This allowed for recommendations to be put forward at different stages, to avoid or minimise negative effects and enhance positive effects. The SEA findings and recommendations were then taken into account while making changes to the Delivery Plan at each stage. Table 3-1 below shows how the preparation of the SEA corresponded with the development of the Delivery Plan. It also includes the different SEA stages and tasks, and how recommendations were considered throughout.

Table 3-1. Stages in the process of SEA to the Delivery Plan.

SEA stages and tasks	Purpose
Scoping Report	
Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope.
A1. Identifying other relevant plans, programmes and environmental protection objectives	To establish how the plan or programme is affected by outside factors, to suggest ideas for how any constraints can be addressed and to help to identify the SEA objectives.
A2. Collecting baseline information	To provide an evidence base for environmental problems, prediction of effects, and monitoring; to help in the development of SEA objectives.
A3. Identifying potential environmental problems	To help focus the SEA and streamline the subsequent problems, prediction of effects, and monitoring; to help in the development of SEA objectives.
A4. Developing SEA objectives	To provide a means by which the environmental performance of the plan or programme and alternatives can be assessed.
A5. Consulting on the scope of SEA	Seeks the views of the Consultation Bodies on the scope and level of detail of the Environmental Report.
Environmental Report	
Stage B	Developing and refining options and assessing effects.
Stage C	Preparing the Environmental Report.

SEA stages and tasks	Purpose
Stage D	Consulting on the draft Delivery Plan and the Environmental Report.
Post-Adoption Statement	
Stage E	Monitoring the significant effects of the Delivery Plan.

4 How have opinions of consultation bodies and the public been considered?

Strategic Environmental Assessments adopted in Northern Ireland are required to meet consultation procedures set out in the Environmental Assessments of Plans and Programmes Regulations (Northern Ireland) 2004. Section 12: Consultation Procedures outlines what is required from these consultations.

The SEA process provides a mechanism to ensure that stakeholder engagement requirements are achieved by providing interested parties and/or organisations and the public an opportunity to inform the process and comment on decisions taken. Stakeholder engagement also ensures that environmental and social issues, constraints, and opportunities are identified and assessed at an early stage of the project. The Scoping Report was subject to a minimum of five-week consultation period, after which the comments received were considered in this Environmental Report.

At each stage of the SEA of the Delivery Plan, the relevant reports were published for consultation with the consultation bodies specifically related to the SEA Directive, and also the public where appropriate. The SEA Regulations require the SEA Post-Adoption Statement to summarise how any opinions expressed by consultation bodies and the public about the SEA have been considered. The SEA Reports and responses received to them during consultation, and how these responses have been addressed, are outlined below.

4.1 SEA Scoping Consultation

JBA Consulting produced the SEA Scoping Report for the NI Peatland Strategy Delivery Plan which was shared with consultees for comment between 8 August 2025 and 12 September 2025. This Scoping Report sets out relevant background information and reasons for the plan formulation and identifies significant environmental issues that require consideration within the study area. It also focuses the SEA on issues most relevant to the plan and if the effect on the environment is likely to be significant, whether positive or negative.

As DAERA is responsible for preparation of the Delivery Plan, consultees included relevant units within the Department such as the Natural Environment Division, Drinking Water Inspectorate, Climate Change Unit, Marine and Fisheries Division, and the Historic Environment Division (HED) of the Department for Communities (DfC). Due to the potential for transboundary effects on the environment, several transboundary consultees from the Republic of Ireland (RoI) were also provided with a copy of the SEA Scoping Report for comment.

Detailed responses were received from various departments of DAERA, that highlighted the several plans and guidance which provide relevant baseline and benchmarks for quantitative assessment of the Delivery Plan. Full responses can be found in Appendix C of the Environment Report. Consultation responses from the Air Quality and Biodiversity Unit

of DAERA suggested that inclusion of an air quality objective was necessary, and further consultation resulted in the development of this, presented in SEA Objective 10.

Transboundary consultee responses were received from the Departments of Climate, Energy and the Environment and the National Parks and Wildlife Service (NPWS) for RoI, who highlighted legislation and guidance relevant to the Delivery Plan. NPWS also provided commentary on Delivery Plan actions, so as recommended, a list of cross-border designations for nature conservation were added to Section 5.3 of the baseline information in the Scoping Report. Further recommendations included transboundary consultee engagement within the Stakeholder Forum and Knowledge Exchange.

4.2 SEA Environmental Report Consultation

Upon completion of the draft, the SEA Environmental Report was shared with stakeholders for consultation, who were approached directly for comment. This consultation period ran from 28 November 2025 to 23 January 2026. There was no public engagement during the consultation for the Environmental Report. This consists of Stage B of the SEA process.

Comments were received from various departments of DAERA, HED, Royal Society for the Protection of Birds (RSPB), Plantlife, and multiple public comments via Citizen Space. These comments related to various queries including baseline information, and areas for further consideration.

On the whole, several concerns were raised in relation to future resource management and funding streams to ensure the delivery of peatland restoration. Whilst these concerns are not within the scope of the SEA, narrative around the effectiveness of the Delivery Plan were included in response.

Consultees also responded in relation to the potential for net deforestation as a result of peatland restoration, and widening the scope of the assessment to consider the marine environment including seascapes. Additional baseline information and amendments to the SEA Objectives were made to better represent and consider potential impacts associated with the Delivery Plan for the marine environment and transboundary heritage considerations.

Several areas for further consideration were included within the final report to address consultee comments received. Additional narrative was included on representation of any subsequent Steering Groups, and the accessibility of the additional data generated by the Actions to ensure the Actions delivered the holistic outcomes from a variety of perspectives.

5 Reasonable Alternatives

The SEA Regulations require an assessment of the Delivery Plan and its reasonable alternatives. It should be noted that this SEA is has considered reasonable alternatives to the Peatland Strategy and Delivery Plan.

The purpose of this section is therefore to outline the reasons for choosing the Peatland Strategy Delivery Plan in its current form as the preferred option in light of other reasonable alternatives considered. Overall, the Peatland Strategy aims "to deliver conservation, restoration and management of intact peatland, degraded peatland and peatland soils to support greater carbon storage and nature recovery." To assess reasonable alternatives, different options for achieving this aim were considered for the Peatland Strategy and Delivery Plan.

The Environmental Improvement Plan for Northern Ireland makes provision for the Delivery Plan via Strategic Environmental Outcome 3, which includes the target to publish a Northern Ireland Peatland Strategy. Therefore, a 'Do Nothing' option is not considered a viable alternative and has not been included in the assessment of reasonable alternatives.

A high level review of the alternatives presented in was undertaken as part of the SEA Environmental Report. These alternatives are outlined below in Table 5-1.

Table 5-1. Reasonable Alternatives for the NI Peatland Strategy Delivery Plan.

Option		Scope
1. (Minimum)	Maintain current peatland restoration practices, No implementation of Delivery Plan.	Circa 500-1000ha per year. Continue to allow peat extraction. Focus on other carbon abatement measures (which are less value for money than peatland restoration).
2.	Upscale peatland habitat restoration. Partial implementation of Delivery Plan.	Focus on restoring peatlands under public ownership. Restore 3000ha of peatland habitat per year from 2026-2035 which equates to 30,000ha by 2035 (this will achieve less than 40% of the Climate Change Committee recommendations.) Restrict the use of peat in horticulture by 2030 through implementation/development of legislation.
3. (Preferred)	Significantly upscale peatland habitat restoration to meet CCC recommendations. Full	Public and private land considered for peatland restoration. Meet 75% of targets set out in Climate Change Committee recommendations including an

Option		Scope
	implementation of the Delivery Plan.	increase in restoration to achieve, on average, 9000ha per year from 2026-2036. Restrict the use of peat in horticulture by 2030 through implementation/development of legislation. Review peat extraction practices.

An appraisal of reasonable alternatives was conducted in Section 7.2 of the Environmental Report. It was decided that maintaining the current peatland restoration and allowing peat extraction to continue (Option 1) is likely to result in little or no change to the environmental baseline. Due to climate change and continued peat extraction, is it expected that this option would result in adverse impacts to most SEA objectives. This option also does not take consideration of updates to plans and policies into account. Therefore, this was not appropriate to pursue.

Option 2 and 3 require significant upscale of peatland restoration and have the potential for more environmental benefits. If designed and implemented effectively this may result in positive contribution to many SEA objectives. However, if implemented in an inappropriate manner there is potential for adverse effects. This risk is managed through the preparation of this SEA and through correct application of the Delivery Plan, and associated actions. Therefore, it is concluded that Option 3 presents the best approach for promoting long term resilience of peatland, and its ecosystem services, as restoration and restrictions on peat extraction are greatest, as long as the Delivery Plan and SEA are properly considered throughout implementation of restoration methods.

6 How will environmental and sustainability effects be monitored?

The SEA Regulations require that "the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action" (Regulation 17), and that the environmental report should provide information on "a description of the measures envisaged concerning monitoring" (Schedule 2).

It is not necessary to monitor every potential effect of the Delivery Plan. The majority of objectives and actions have been identified to not have any direct effect on the SEA objectives; however, they are likely to have indirect beneficial effects upon the environment as they relate to enhanced understanding and awareness of flood risk along with measures to reduce flood frequency and magnitude.

There are not expected to be any negative impacts of the Delivery Plan on the identified SEA objectives. Potentially significant positive effects were identified in relation to the SEA objectives for climatic factors. This is because the Delivery Plan focuses on restoration and therefore strongly supports the objectives on climatic factors, because it directly addresses both climate mitigation and adaptation.

The outcomes of the measures outlined within this Delivery Plan cannot be certain, so in this case it is recommended that monitoring plans are still put in place. The indicators will be measured primarily by DAERA, with other partners unconfirmed at this stage. The plan for each receptor outlined within the SEA are summarised in Table 6-1.

Table 6-1. Proposed monitoring measures for impacts of the Delivery Plan.

SEA Receptor	SEA objective	Monitoring Indicators
Landscape	1. Protect the integrity of national landscape and seascape character.	Changes in the condition and extent of existing characteristic elements of the landscape. The condition and quality of landscape features introduce to the environment (e.g. increased peatland extent).

SEA Receptor	SEA objective	Monitoring Indicators
Biodiversity, flora and fauna	2. Maintain and enhance biodiversity, wildlife and habitat connectivity.	Recorded numbers of protected species. Percentage change in area of priority habitats. Status, condition, area and number of designated sites and their species. Deliver measures which also improve the ecological status of WFD water bodies. Amount, diversity and quality of ecosystem. Extent and growth of nature networks in Northern Ireland.
Water environment	3. Protect and enhance the quality of water features and resources.	Nutrient levels in water bodies. WFC chemical or ecological status of water bodies. Compliance rates of Private Water Supplies.
	4. Reduce the risk of flooding to existing communities and ensure no new developments are at increased risk.	Implementation of natural flood management measures. No change or reduction in flood extents.
Geology, soils and land use	5. Protect and enhance soil quality.	Risk levels of contamination. Soil quality. Loss or damage to sensitive soils and land uses.
Historic environment	6. Protect conserve and enhance archaeological remains and other heritage assets and support the undertaking of archaeological investigations to understand and mitigate effects.	Number of non-designated heritage sites at risk. Number of heritage sites where restoration activities have harmed their significance. Archaeological findings during restoration work. Number of restoration activities adjacent to or including site of heritage assets.
Material assets	7. Safeguard compatibility with existing or proposed land surrounding users	Diversification of agricultural land holdings. Woodland creation in proximity to peatland. Frequency and number of landslides.

SEA Receptor	SEA objective	Monitoring Indicators
	and functioning of infrastructure.	Flood risk extent.
Population	8. Support the transition to diversified land management practices and improve ecosystem services.	Diversification of agricultural land holdings. No reduction in percentage of accessible green space
Climatic factors	9. Support sustainable restoration that is adapted or adaptable to climatic change.	Greenhouse gras emissions from peatland. Conditions of designated sites. Loss of peat due to climatic/weather events e.g. wildlife, drought and intense rainfall in succession.
Air Quality	10. Protect peatland habitats from exposure to atmospheric nitrogen deposition.	Percentage area of peatland habitats in NI exceeding the critical level of ammonia in the atmosphere. Percentage area of peatland habitats in NI exceeding the critical load for nitrogen deposition. Excess deposition of nutrient nitrogen above the critical load.

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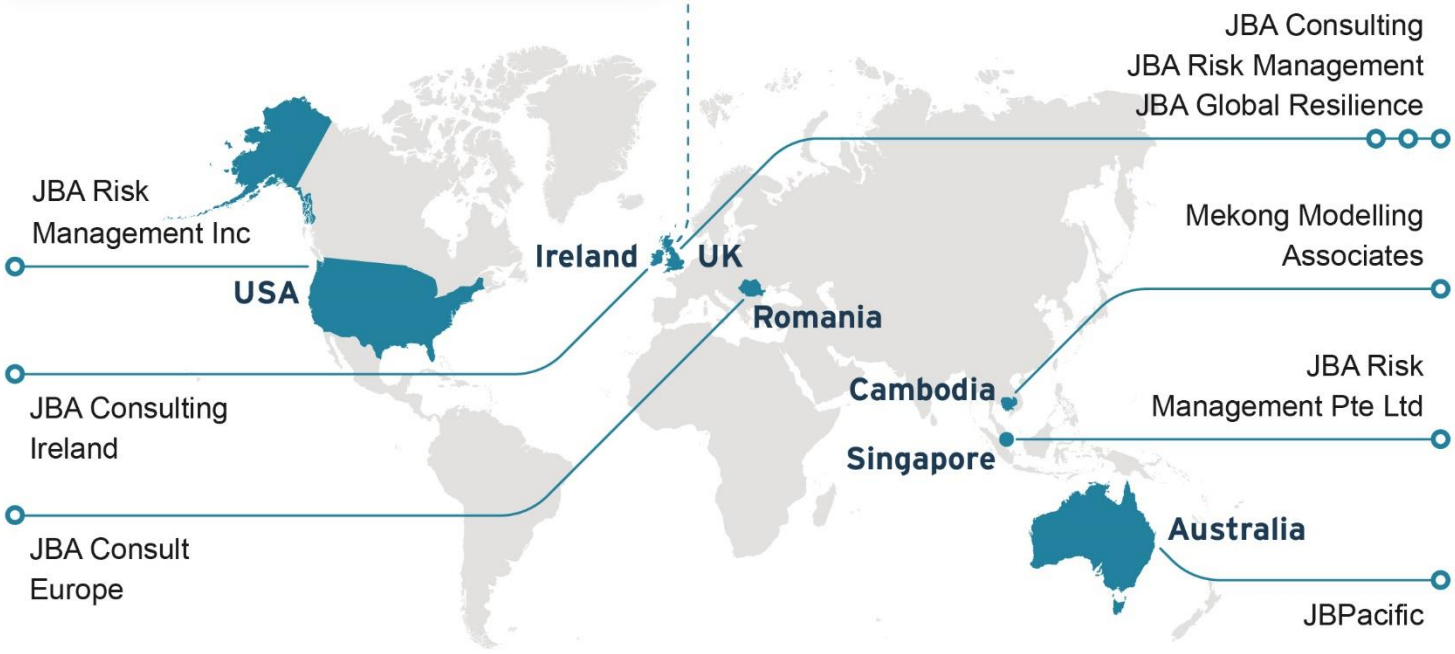

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