



ENVIRONMENTAL REPORT

ADDENDUM I



STRATEGIC ENVIRONMENTAL ASSESSMENT
OF THE
DRAFT RENEWABLE ENERGY STRATEGY FOR COUNTY MAYO

MAYO COUNTY COUNCIL
COMHAIRLE CONTAE MHAIGH EÓ

May 2011

Introduction

This is the first addendum of the Environmental Report on the Strategic Environmental Assessment of the draft Renewable Energy Strategy for Co. Mayo 2010-2020 (draft RES). This document responds to relevant submissions/observations made on the Strategic Environmental Assessment Environmental Report of the draft Renewable Energy Strategy for Co. Mayo 2010-2020 (draft RES) which was on display 22nd December 2010 to 28th January 2011. The response to the relevant submissions is incorporated into the “Manager’s Report on the Submissions on the draft Renewable Energy Strategy for Co. Mayo 2010-2020 (3rd May 2011)”.

The submissions have been circulated and assessed by the SEA team. A number of recommendations have been made from the SEA team based on the submissions made. It should be noted that changes will not be made to the Environmental Report; this Addendum forms part of the documentation of the ongoing SEA process of the plan. It supplements the Environmental Report and should be read in conjunction with the same.

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Submissions made on the SEA Environmental Report

The draft Renewable Energy Strategy 2010-2020 and accompanying environmental reports went on display on the 22nd December 2010 to 28th January 2011. Out of the 53 submissions received on the draft Renewable Energy Strategy, three referred to the Strategic Environmental Assessment Environmental Report namely:

DRES-33 Environmental Protection Agency

DRES-42 Engineers of Ireland West Region

DRES-51 Department of Environment, Heritage and Local Government

The submissions are summarised and responded to below.

Reference: DRES-33
Name: Environmental Protection Agency
Summary: This submission refers to all documents of the draft RES. In relation to the draft RES itself there appears to be some uncertainty as to which renewable energy technologies are proposed in the Strategy; it should also be clarified how the protection of environmental sensitivities is adequately integrated into the Strategy; and the cumulative effects of renewable energy technologies with each other and with other plans and programmes should be addressed. Recommendations are given in relation to water protection, flood prevention and management, slope stability and landslide susceptibility, biodiversity, air, noise, climatic factors, landscape character assessment, infrastructure planning, waste management, Environmental Impact Assessment, Strategic Environmental Assessment, Appropriate Assessment, and Obligations with respect to national plans and policies and EU environmental legislation. Most notable recommendations are suggested for: the provision of buffers zones between designated ecological sites and areas considered suitable for renewable energy developments; the assessment of cumulative / in-combination effects of renewable energy developments and with other plans and programmes; areas identified in the Strategy for potential development should not be in conflict with high vulnerability landscapes identified in Landscape Character Assessments. A number of text amendments to the draft Strategy are also recommended. Many of the issues raised in the draft Strategy are also raised in relation to the SEA Environmental Report. There are also recommendations on how the Environmental Report can be improved such as the inclusion of key summary maps, maps highlighting the areas for renewable energy potential superimposed over environmental spatial data, additional tables (or additional columns to existing tables) showing integration between SEOs and policies and objectives in the draft RES and SEOs and mitigations measures proposed, greater scrutiny and evaluation of

supporting/ancillary infrastructure associated with renewable energy developments, in-combination/cumulative effects of renewable energy developments, supporting infrastructure and access to grids, inclusion of objectives for energy conservation, clarify how the full range of environmental effects of the implementation of the Strategy (i.e. secondary, cumulative, synergistic, short, medium, long-term, permanent, temporary, positive and negative effects) have been assessed and documented. The mitigation measures should be clearly indicated how they have been addressed in the Strategy. There are also recommendations given in relation to Monitoring Measures.

Elements that should be addressed in the HDA are also suggested such as potential impacts arising from renewable energy developments on Natura 2000 sites.

Manager's Response:

Having assessed the EPA submission it is recommended that a number of amendments be made to the draft RES. These are outlined below.

In relation to the SEA, all aspects in relation Environmental Report must be addressed in order to ensure compliance with the relevant EU and national legislation. The environmental report will not be amended but will be accompanied by an Addendum which will inform the members and all interested parties of how the SEA process informed the draft RES and the final SEA Statement will summarise the SEA process and state how the adopted RES will impact on the environment. An assessment of the cumulative impacts of the draft RES on its own and in combination of other plans and projects in and adjoining the Strategy area will form part of the SEA.

Manager's Recommendation No. 33(a):

Amend the Introduction of the draft RES to clearly state that all forms of RE development are being considered in the draft RES.

Manager's Recommendation No. 33(b):

Insert a new map into the draft RES indicating all RE proposals on one map.

Manager's Recommendation No. 33(c):

Clearly outline in Section 5 of the draft RES how the environmental and planning considerations were integrated into the RES through GIS mapping.

Manager's Recommendation No. 33(d):

Integrate mitigation measures into the main body of the Strategy as opposed to adding as an Appendix.

Manager's Recommendation No. 33(e):

Link the RES to policies and objectives of the MCDP.

<p>Reference: DRES-42</p> <p>Name: Brendan O' Maolagain Engineers Ireland West Region</p>
<p>Summary:</p> <p>The submission welcomes the draft RES. The government targets set out in the draft RES are queried and are stated to be at variance with those set out in the National Renewable Energy Action Plan. It is stated that the statement that wind power produces no greenhouses gases during its operation is not accurate. The definition of off-shore and on-shore wind is also queried. It is stated that Mayo Co. Co. should expedite the establishment of the National Wave Energy Test Site and connection to the national grid. The submission queries consumption rates outlined in the DRES. The submission also queries the figures in relation to the Gate 3 programme as set out in the draft RES. The submission strongly supports the commitment to upgrade the national grid and support the Council's approach to along existing power lines provided that it is practical to do so without causing undue disruption to existing customers. It is suggested that the five strategies examined in the SEA should be explained in the draft RES. The submission congratulates the Council for the inclusion of a vision in the draft RES and commends the aim of the Strategy, as it is stated that to date much of the wind energy development in the country has been developer lead rather than plan led which is undesirable. The submission advises that the target set out in Objective 1.3 should be in line with national targets (i.e. 16% and not 20%). The submission commends the Council for identifying areas of having no or low planning which will give RE developers a higher level of certainty in future. The submission supports the objective of developing a renewable energy park in Belmullet given that SEAI already have a presence in the town.</p>
<p>Manager's Response:</p> <p>It was noted on the preparation of the draft RES that the national renewable energy targets have altered in recent years. The most recent targets will be set out in the final Strategy. Definitions of on-shore and off-shore wind are correct and the draft RES have further explained how the wind is harnessed accordingly. While Mayo County Council support the establishment of the National Wave Energy Test Site, Mayo County Council are not in a position to expedite the establishment of this site. The establishment of the site shall be subject to permission and licences from the Department of the Environment, Marine and Natural Resources. The draft RES consists of three documents and therefore the alternative scenarios for the RES are set out the Environmental Report. It is considered unnecessary to detail these again in the Strategy document itself. However a more detailed reference to the SEA Environmental Report and Habitats Directive Assessment Report may be outlined in this section to clarify this issue.</p>
<p>Manager's Recommendation No. 42(a): Amend targets set out in the draft RES as appropriate</p> <p>Manager's Recommendation No. 42(b): Amend Section 5 of the draft RES to guide readers to the SEA and HDA documents.</p>

Reference: DRES-51
Name: David Touhy, Department of the Environment, Heritage and Local Government

Summary:

This submission is in two parts; the first refers to built heritage observations and recommendations and the second part refers to nature conservation.

It is stated that the report contains satisfactory objectives for protection of archaeological heritage. It is stated that as the document is a 'high level' document, the policies and objectives will be of a broad nature and any particular issues relating to significant impact on architectural heritage which come to the fore when specific development proposals are put forward will be addressed at that future time. However a number of observations are put forward with a view to clarifying and improving the content of the draft Strategy. It is recommended that entire content of the SEA Environmental Report is reviewed in order to remove all irrelevant matters and unintentional implications in relation to significant effect on the architectural heritage of County Mayo. It is recommended that the linkages between the RES and County Development Plan are clearly stated. It is recommended that the EPO target (in the SEA report) for Architectural Heritage is amended.

In relation to nature conservation, the plan-led approach of the draft RES is welcomed. A number of suggested text amendments to policies and objectives are suggested, which include ensuring requirements of Habitats and Birds Directives are reflected; the visual amenity of Ballycroy National Park is not impinged on; protection of NHAs, pNHAs, the National Park and Nature Reserves in addition to Natura 2000 sites. It is stated that it is unclear where other RE technologies (other than wind) are being directed and this should be clarified. Targets and theoretical potential amounts of RE outputs are queried. Strategic infrastructure is a concern in relation to the location of new high voltage power lines and grid connections to individual developments. Infrastructure to serve off shore developments is identified as potentially damaging for ecological sites and species. Mitigation measures are required in this instance.

In relation to the HDA it is stated that Stage 2 of the assessment provides little additional information or focus on key issues other than mitigation measures. A Natura Impact Assessment is necessary for the Strategy. It is the responsibility of the Council to ensure full compliance with the requirements of the Habitats Directive.

A number of recommended text amendments to the draft RES and the SEA Environmental report are included in the submission.

Manager's Response:

Mayo County Council will incorporate suggested text amendments to policies and objectives into the RES in so far as is possible.

In relation to the HDA the Council have ensured full compliance with the requirements of the Habitats Directive

Manager's Recommendation No. 51:

Amend suggested text in relation to policies and objectives subject to agreement with Specialist HDA Groups within Mayo County Council.

Updating the SEA Environmental Report

Changes will not be made to the Environmental Report; this Addendum forms part of the documentation of the ongoing SEA process of the plan. It supplements the Environmental Report and should be read in conjunction with the same. Having assessed the submissions received on the SEA Environmental Report the Environmental Report is updated as follows:

Section 1

SEA Introduction & Context is updated by including the following text:

The Strategy supports all forms of renewable energy technologies in the County including renewable energy generated from wind, wave, tides, biomass, municipal waste, organic wastes, solar and geothermal sources, at both macro and micro levels, along with renewable energy Research and Development.

Section 3

Section 3 is updated by including a new subsection 3.2.8:

3.2.8 Cumulative Impacts of Plans and Programmes

The cumulative impact of plans and programmes in relation to renewable energy production in the County, adjoining counties and the coast is unknown. However it is envisaged that if a number of projects and initiatives were carried out arising from the existing plans and programmes as set out above, they would mostly likely have positive and negative impacts on the environment and society.

Positive impacts would include possible reduction in green house gases and noxious emissions, possible reduction in energy costs, reduction in reliance in fossil fuels, security of energy supply, community benefits and employment opportunities.

Negative impacts would include loss of habitats and/or species, significant visual impacts, navigation disruptions, negative neighbour interactions such as noise, odour, signal interference and shadow flicker.

The Renewable Energy Strategy seeks to minimise or prevent the potential negative impacts through mitigation measures set out in Section 8 of this Environmental Report, which have been incorporated into the Renewable Energy Strategy for Co. Mayo.

Section 4

Section 4.8.2 is updated by inserting the following paragraph after the second paragraph:

Ireland has a long and varied maritime history with extensive records for shipwrecks along its coast, rivers, lakes and offshore waters. Evidence for maritime archaeology may survive in the form of ports, harbours, piers and jetties, coastal settlements, submerged cultural landscapes, fortifications, anchors, fish traps, shell middens, kelp grids and the material traces of other activities in the past that involved the exploitation of the coastal and maritime resource. Previously unrecorded archaeological sites other than wrecks may also lie undiscovered in Ireland's coastal waters. The 1987 and 1994 (Amendment) Acts of the National Monuments Act 1930-2004 specifically address the protection of underwater archaeology. All wrecks over 100 years old and archaeological objects underwater are protected under the legislation and significant wrecks less than one hundred years old can be designated by Underwater Heritage Order on account of their historical, archaeological or artistic importance.

Section 4.8.4 Existing Environmental Problems relating to Cultural Heritage (Architectural Heritage) is rephrased as:

The architectural heritage of Co. Mayo is an important asset and this cultural heritage is protected under legislation. The architectural heritage can be adversely impacted upon by proposed developments if not mitigated against.

Section 4.9.1 Introduction is updated to include the following definition of landscape at the end of the first paragraph:

The European Landscape Convention defines landscape as "An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors."

Section 5 Environmental Protection Objectives

Table 5.8 EPOs, Targets and Indicators for Cultural Heritage are reworded as follows:

***EPO CHI:** To protect the archaeological heritage and especially sites identified in the Record of Monuments and Places, National Monuments in the ownership or guardianship of the State and National Monuments that are subject to Preservation Orders and to safeguard the integrity of the archaeological sites in their setting.*

***Indicator CHI:** Number of developments carried out over the lifespan of the renewable energy strategy which result in the full or partial loss of the archaeological heritage and especially sites identified in the Record of Monuments and Places, National Monuments in the ownership or guardianship of the State and National Monuments that are the subject of Preservation Orders. The integrity of the archaeological sites in their setting can also be impacted upon by new developments.*

Target CH1: *No developments carried out over the lifespan of the renewable energy strategy which result in the full or partial loss of the archaeological heritage and especially sites identified in the Record of Monuments and Places, National Monuments in the ownership or guardianship of the State and National Monuments that are the subject of Preservation Orders. No developments which result in the full or partial loss of the integrity of the archaeological sites in their setting.*

Target AH1: *To ensure that renewable energy developments do not give rise to any adverse impacts or loss of the architectural heritage.*

Target AH2: *To ensure that renewable energy developments do not give rise to any adverse impacts or loss to heritage bridges which form part of the architectural heritage of Co. Mayo.*

Section 6: Alternative Scenarios

The first paragraph in Section 6.5.1 Archaeological Heritage (S1) is reworded as follows:

The archaeological heritage and especially sites identified in the Record of Monuments and Places, National Monuments in the ownership or guardianship of the State and National Monuments that are subject to Preservation Orders will be impacted upon.

The first paragraph in Section 6.5.2 Archaeological Heritage (S2) is reworded as follows:

The archaeological heritage and especially sites identified in the Record of Monuments and Places, National Monuments in the ownership or guardianship of the State and National Monuments that are subject to Preservation Orders will be impacted upon. The integrity of the archaeological sites in their setting will be impacted upon. Off shore wind energy devices may have the potential to negatively impact on known or unrecorded submerged or buried archaeology.

The text below is included at the end of the first paragraph in Section 6.5.3 Archaeological Heritage (S3):

Off shore wind energy devices may have the potential to negatively impact on known or unrecorded submerged or buried archaeology.

The first paragraph in Section 6.5.4 Archaeological Heritage (S4) is replaced with:

Renewable energy developments are guided to on-shore and off-shore areas in and around the County in a planned manner. The archaeological heritage and especially sites identified in the Record of Monuments and Places, National Monuments in the ownership or guardianship of the State and National Monuments that are subject to Preservation Orders will be impacted upon. The integrity of the archaeological sites in their setting will be impacted upon. Off shore wind energy devices may have the

potential to negatively impact on known or unrecorded submerged or buried archaeology.

The text below is included at the end of the first paragraph in Section 6.5.5 Cultural Heritage (Archaeological) (S5):

Off shore wind energy devices may have the potential to negatively impact on known or unrecorded submerged or buried archaeology.

Section 8 Mitigation Measures

A new bullet point (below) is included in Section 8.3.7 Cultural Heritage in the subsection Archaeological Heritage between the fourth and fifth bullet point:

- *Offshore wind energy devices may have the potential to negatively impact on known or unrecorded submerged or buried archaeology. A full Underwater Archaeological Impact Assessment should be carried out as part of the Strategic Environmental Assessment for all of these offshore projects. Any archaeological assessment undertaken as part of an SEA for proposed offshore developments should include assessment of all pipeline/cable routes and include full assessment of all landfall areas, including looking at the foreshore and terrestrial areas immediate to the proposed works.*

The following text is inserted into Section 8.2 SEA Recommendation after the first sentence of this section:

The mitigation measures detailed in Section 8.3 have been incorporated into the Renewable Energy Strategy.

References

The following references are included in the Reference section:

Record of Monuments and Places, Co. Mayo. (Archaeological Survey of Ireland, OPW 1996)

Framework and Principles for the Protection of the Archaeological Heritage (DAHGI 1999a).

Policy and Guidelines on Archaeological Excavation (DAHGI 1999b).

Archaeology and Development: Guidelines for Good Practice for Developers (ICOMOS 2000).

Review of Archaeological Assessment and Monitoring Procedures in Ireland (Lambrick and Doyle 2000).

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