



ENVIRONMENTAL REPORT

ADDENDUM II



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

MAYO COUNTY COUNCIL
COMHAIRLE CONTAE MHAIGH EO

May 2011

Introduction

This is the second addendum of the Environmental Report on the Strategic Environmental Assessment (SEA) of the draft Renewable Energy Strategy for Co. Mayo 2010-2020 (draft RES). This document identifies the environmental consequences of the relevant proposed amendments to the draft Strategy resolved at the Mayo County Council meeting held on 9th May 2011. The amendments have been circulated and assessed by the SEA team for their potential impact on the environment.

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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Amendments to the draft Renewable Energy Strategy for Co. Mayo 2010-2020

Although there are no statutory processes for the making of the draft Renewable Energy Strategy for County Mayo 2010-2020 (draft RES) the Council took an approach similar to that required to make a development plan. The draft RES and accompanying environmental reports were put on display during the 22nd December 2010 – 28th January 2011. Written submissions/observations were invited on the draft RES and accompanying environmental reports. The “Manager’s Report on the Submissions on the draft Renewable Energy Strategy for Co. Mayo 2010-2020 (3rd May 2011)” summaries and responds to the submissions/observations received. It also recommends proposed amendments to the draft RES. The proposed amendments to the draft Renewable Energy Strategy for County Mayo 2010-2020 (draft RES) constitutes a further stage in the process of making the Strategy.

The SEA Environmental Report Addendum I also sets out responses and recommendations to the submissions/observations received on the SEA Environmental Report and updates the Environmental Report accordingly.

This is the second 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 identifies the environmental consequences of the relevant proposed amendments to the draft Strategy resolved at the Mayo County Council meeting held on 9th May 2011.

The Environmental Consequences of the proposed amendments to the draft Renewable Energy Strategy 2010-2020

The proposed amendments to the draft Renewable Energy Strategy 2010-2020 have been assessed by the Strategic Environmental Assessment Team. The proposed amendments and SEA responses to the proposed amendments are shown below. The Manager's Recommendation numbers are consistent with that in the Manager's Report (3rd May 2011). Where no amendments were recommended these have not been shown in this document but can be viewed in the Manager's Report (3rd May 2011):

Manager's Recommendation No. 1:
<ul style="list-style-type: none"> a. Amend Map 1 Wind Energy (to reduce lands for RE development to avoid a wind bubble) b. Amend Map 3 to identify lands suitable for biomass development c. Include a new map into the draft RES compiling all areas deemed suitable for all types of RE developments
SEA Response:
<ul style="list-style-type: none"> a. This recommendation has not occurred. b. It is considered that the amendment may have positive impact on energy infrastructure in the County; uncertain impact on biodiversity, flora and fauna, landscape, soils, geology, population and human health; negative impact on the road network and cultural heritage (archaeology) in the County; and no impact on waste infrastructure, drinking water infrastructure, IWAK, marine water and ecology, freshwater quality and ecology, hydrogeology and flood risk in the County. c. It is considered that the amendment will have no impact on energy infrastructure, road network, waste infrastructure, drinking water infrastructure, IWAK, landscape, soils, geology, population and human health, cultural heritage (archaeology), fresh water quality and ecology, marine water and ecology, hydrogeology and flood risk in the County.

Manager's Recommendation No. 4:
Include site at Bunnyconnellan East on Map 1 Wind Energy 'Open for Consideration – Tier 2'
SEA Response:
It is considered that the amendment may have positive impact on energy infrastructure; negative impact on the road network, soils, peatland biodiversity, flora and fauna, and landscape; no impact on waste infrastructure, drinking water infrastructure, IWAK, geology, population and human health, cultural heritage (archaeology), fresh water quality and ecology, marine water and ecology, hydrogeology and flood risk at this location.

Manager's Recommendation No. 8:
Insert a provision in the draft RES that 'Open for Consideration - Tier 2' classification of Map 1 Wind Energy be reviewed following a determination by EirGrid of grid infrastructure for the County
SEA Response:
It is considered that the amendment will have uncertain impact on biodiversity, flora and fauna, landscape, soils, geology and energy infrastructure; and no impact on waste infrastructure, drinking water infrastructure, road infrastructure, IWAK, population and human health, geology, freshwater quality and ecology, marine water and ecology, cultural heritage (archaeology), hydrogeology and flood risk in the County.

Manager's Recommendation No. 27:
Indicate on the relevant maps of the draft RES that micro-renewable energy technologies (which include wind turbines) for domestic, business, industrial and agricultural use micro renewable generation may be exempt from planning permission under the Planning & Development regulations 2008 (SI 256 of 2008) and the Planning & Development Regulations 2007 (S.I. No. 83 of 2007). Where planning permission is required, micro renewable energy technologies will be considered in all areas of the County subject to the proper planning and sustainable development of the area
SEA Response:
It is considered that the amendment will have positive impact on energy infrastructure; negative impact on the road network in the County; cumulative impact could be negative on bats and avian fauna; and no impact on waste infrastructure, drinking water infrastructure, IWAK, population and human health, landscape, cultural heritage (archaeology), freshwater quality and ecology, marine water and ecology, hydrogeology and flood risk in the County.

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
SEA Response:
It is considered that the amendment will have no impact on biodiversity, flora and fauna, energy infrastructure, the road network, waste infrastructure, drinking water infrastructure, IWAK, population and human health, landscape, soils, geology, cultural heritage (archaeology), freshwater quality and ecology, marine water and ecology, hydrogeology and flood risk in the County.

Manager’s Recommendation No. 33(b):

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

SEA Response:

It is considered that the amendment will have no impact on biodiversity, flora and fauna, energy infrastructure, the road network, waste infrastructure, drinking water infrastructure, IWAK, population and human health, landscape, soils, geology, cultural heritage (archaeology), freshwater quality and ecology, marine water and ecology, hydrogeology and flood risk in the County.

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

SEA Response:

It is considered that the amendment will have no impact on biodiversity, flora and fauna, energy infrastructure, the road network, waste infrastructure, drinking water infrastructure, IWAK, population and human health, landscape, soils, geology, cultural heritage (archaeology), freshwater quality and ecology, marine water and ecology, hydrogeology and flood risk in the County.

Manager’s Recommendation No. 33(d):

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

SEA Response:

It is considered that the amendment will have no impact on biodiversity, flora and fauna, energy infrastructure, the road network, waste infrastructure, drinking water infrastructure, IWAK, population and human health, landscape, soils, geology, cultural heritage (archaeology), freshwater quality and ecology, marine water and ecology, hydrogeology and flood risk in the County.

Manager’s Recommendation No. 33(e):

Link the RES to policies and objectives of the MCDP

SEA Response:

It is considered that the amendment will have a positive impact on biodiversity, flora and fauna, landscape, energy infrastructure and geology; and no impact on the road network, waste infrastructure, drinking water infrastructure, IWAK, population and human health, soils, cultural heritage (archaeology), freshwater quality and ecology, marine water and ecology, hydrogeology and flood risk in the County.

Manager's Recommendation No. 34:

Amend text in section 6.4.3 Hydropower (p.47 of the draft RES) to include the following text outlined in green-

*Any proposed small scale hydro-electric schemes will be assessed having regard to the Planning, Design, Construction & Operation of Small Scale Hydro-Electric Schemes and Fisheries **or adapted on the recommendation of the Inland Fisheries of Ireland to facilitate local conditions.***

SEA Response:

It is considered that the amendment will have a positive impact on biodiversity, flora and fauna, fresh water quality and ecology and no impact on energy infrastructure, the road network, waste infrastructure, drinking water infrastructure, IWAK, population and human health, landscape, soils, geology, cultural heritage (archaeology), marine water and ecology, hydrogeology and flood risk in the County.

Manager's Recommendation No. 39:

Amend Map 1 by applying the safety exclusion zone around Ireland West Airport Knock and remove any proposed classifications in the draft RES for RE developments within this exclusion zone

SEA Response:

It is considered that the amendment will have a positive impact on IWAK, biodiversity, flora and fauna, population and human health, cultural heritage (archaeology) and landscape; and no impact on energy infrastructure, the road network, waste infrastructure, drinking water infrastructure, soils, geology, marine water and ecology, hydrogeology and flood risk in the County.

Manager’s Recommendation No. 40(a):

Replace text on page 33 of the draft RES from

4.3 Gate 3 ITC Programme

~~Gate 3 ITC Programme is an innovative methodology adopted by EirGrid to access the capability of the transmission grid to accommodate Gate 3 applications on a firm basis. The programme sets out full firm access to the grid in the years 2010 to 2023 for conventional and renewable energy production. Approximately 20 proposed on-shore wind farms in Mayo are included in the Gate 3 ITC Programme for the period 2010 to 2023, generating a total of 500.25MW. Offshore wind generated developments in Mayo are currently not listed in the Gate 3 ITC Programme 2010–2023. However the Gate 3 ITC Programme indicates that there are likely to be a sizeable number of opportunities for further MW connections on a non-firm basis where individual developers, that are eligible for a connection offer, believe that expected constraints are sufficiently low to make the project financially viable, and where the Systems Operators confirm that the network is available to accommodate such projects.~~

for

4.3 Gate 3

The “Gate 3” process which is now underway will deal with connections for over 3900 MW of renewable generation, which is designed to meet the Government’s renewable target. The Gate 3 process is based on achievement of the forward-looking Grid Development Strategy. Gate 3 can be defined as the third “group processing” directive for renewable connection offers issued by the Commission for Energy Regulation (CER). Specifically in relation to Mayo, under this directive EirGrid and ESB Networks as the Transmission System Operator and Distribution System Operator respectively are to issue connection offers to approximately 20 proposed on-shore wind farms with a total generation capacity of approximately 720 MW which are based in the county. As part of Gate 3 analysis undertaken by EirGrid it was demonstrated that the delivery of the Grid25 network is key to realising the full potential of these Gate 3 projects.

SEA Response:

It is considered that the amendment will have a negative impact on the road network in the County; uncertain impact on energy infrastructure in the County; and no impact on biodiversity, flora and fauna, waste infrastructure, drinking water infrastructure, IWAK, population and human health, landscape, soils, geology, cultural heritage (archaeology), freshwater quality and ecology, marine water and ecology, hydrogeology and flood risk in the County.

Manager's Recommendation No. 40(b):

Replace text on page 34 of the draft RES from
~~The Council's preferred corridor for a 400 kV line is that along the existing 110 kV line in the County.~~

for

The corridor for a 400kV transmission line is to be assessed in accordance with best international practice following a detailed analysis of routing options incorporating technical and environmental considerations.

SEA Response:

It is considered that the amendment will have a positive impact on the road network, biodiversity, flora and fauna, freshwater quality and ecology; uncertain impact on population and human health and landscape; and will have no impact on energy infrastructure, waste infrastructure, drinking water infrastructure, IWAK, soils, geology, cultural heritage (archaeology), marine water and ecology, hydrogeology and flood risk in the County.

Manager's Recommendation No. 40(c):

Replace objective 3.2 on page 43 of the draft RES from

~~It is an objective of the Council to advise Eirgrid that, primary consideration should be given to following the existing 110 kV and 38 kV lines in the County or their established way leaves when selecting route options for any new 220 kV or 400 kV transmission line.~~

for

It is an objective of the council that the final route of the any new 110/220 or 400 kV transmission lines be selected in line with best International Practice. Among other things, this process will require that a highly detailed study be carried out incorporating technical and environmental considerations to assist in selecting the most appropriate route. As part of this process the feasibility of using all existing linear infrastructure corridors such as road and rail as well as the existing transmission corridors for the 110 kV and 38 kV circuits or their established way leaves should be given due consideration. The existing transmission corridors for the 110kV and 38kV circuits shall be followed as far as technically and environmentally practicable.

SEA Response:

It is considered that the amendment will have a positive impact on biodiversity, flora and fauna, freshwater quality and ecology, landscape, road networks, energy infrastructure and population and human health in the County; and no impact on waste infrastructure, drinking water infrastructure, IWAK, soils, geology, cultural heritage (archaeology), marine water and ecology, hydrogeology and flood risk in the County.

Manager's Recommendation No. 41(a):

Amend titles on Map 1 to reflect the text on page 46 of the draft RES.

SEA Response:

It is considered that the amendment will have no impact on biodiversity, flora and fauna, energy infrastructure, the road network, waste infrastructure, drinking water infrastructure, IWAK, population and human health, landscape, soils, geology, cultural heritage (archaeology), freshwater quality and ecology, marine water and ecology, hydrogeology and flood risk in the County.

Manager's Recommendation No. 41(b):
Amend the number of turbines considered in a cluster from up to 3 turbines to 'up to 3-5 turbines depending on site conditions and visual amenity.'
SEA Response:
It is considered that the amendment may have a negative impact on biodiversity, flora and fauna, road network, cultural heritage (archaeology), soils, geology and landscape in the County; uncertain impact on energy infrastructure; and no impact on waste infrastructure, IWAK, population and human health, freshwater quality and ecology, marine water and ecology, hydrogeology and flood risk in the County.

Manager's Recommendation No. 42(a):
Amend targets set out in the draft RES as appropriate
SEA Response:
It is considered that the amendment will have no impact on biodiversity, flora and fauna, energy infrastructure, the road network, waste infrastructure, drinking water infrastructure, IWAK, population and human health, landscape, soils, geology, cultural heritage (archaeology), freshwater quality and ecology, marine water and ecology, hydrogeology and flood risk in the County.

Manager's Recommendation No. 42(b):
Amend Section 5 of the draft RES to guide readers to the SEA and HDA documents.
SEA Response:
It is considered that the amendment will have no impact on biodiversity, flora and fauna, energy infrastructure, the road network, waste infrastructure, drinking water infrastructure, IWAK, population and human health, landscape, soils, geology, cultural heritage (archaeology), freshwater quality and ecology, marine water and ecology, hydrogeology and flood risk in the County.

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.
SEA Response:
It is considered that the amendment may have positive impact on biodiversity, flora and fauna, landscape; and no impact on energy infrastructure, the road network, waste infrastructure, drinking water infrastructure, IWAK, population and human health, soils, geology, cultural heritage (archaeology), freshwater quality and ecology, marine water and ecology, hydrogeology and flood risk in the County.

Other recommendations:
It should be clearly stated that lands identified for RE developments does not exclude other developments from being considered on the lands.
SEA Response:
It is considered that the amendment may have a negative impact on the road network, soils and geology in the County, uncertain impact on biodiversity, flora and fauna; and no impact on landscape, energy infrastructure, waste infrastructure, drinking water infrastructure, IWAK, population and human health, cultural heritage (archaeology), freshwater quality and ecology, marine water and ecology, hydrogeology and flood risk in the County.

Other recommendations:
It is an objective of Mayo County Council to utilise renewable energy technologies at the sites of its major infrastructure e.g. sewage treatment plants, water treatment plants etc where feasible.
SEA Response:
It is considered that the amendment may have a negative impact on the road network, soils and geology in the County; uncertain impact on biodiversity, flora and fauna, landscape, population and human health and energy infrastructure; and no impact on waste infrastructure, drinking water infrastructure, IWAK, cultural heritage (archaeology), freshwater quality and ecology, marine water and ecology, hydrogeology and flood risk in the County.

Assessment

Although some of the proposed amendments are considered to have potential negative or uncertain impacts it is considered that the proposed mitigation measures outlined in the Renewable Energy Strategy which will be applied at project level will negate potential negative or uncertain impacts.