Strategic Environmental Assessment Statement of the County Galway Wind Energy Strategy

SEA Statement October 2011

Comhairle Chontae na Gaillimhe Galway County Council





1.1.2 Background to current Wind Energy Strategy in County Development Plan 2009 to 2015

Galway County Council (GCC) has prepared a **Wind Energy Strategy** (WES) for County Galway. The strategy provides strategic direction to encourage renewable energy and to guide the siting and design of wind energy developments in appropriate locations within the County. County Galway has significant wind resources and a key priority of the WES is to identify sites of strategic, national and regional importance that have the potential to accommodate wind energy development.

The WES revises and updates the areas of wind farm potential identified in the *Galway County Development Plan* (GCDP) 2009-2015. This has been undertaken in accordance with Objective IS19 of the GCDP and accordingly reviews areas of wind farm potential having regard to protected sites, habitats and species and other environmental, landscape, infrastructural and settlement considerations. The WES has beem adopted as a variation to the existing GCDP 2009-2015 following consideration of written submissions received from the public and other stakeholders.

The existing Wind Resource Zones identified in the GCDP were developed from research undertaken as part of the *Landscape and Landscape Character Assessment for Galway County 2002* prepared on behalf of GCC, which was used to identify appropriate areas for wind farm development. Therefore, the key considerations were the landscape and visual impacts of wind farm developments. Wind potential areas were identified as Strategic Areas, Areas for Consideration and No Go Areas.

In undertaking the current strategy, landscape and visual considerations have been considered in conjunction with a range of other factors, including the need to achieve greater energy security, achieving commitments at national and international level regarding reductions in greenhouse gases, promoting renewable energy, protected areas of high biodiversity and other environmental considerations. This WES will supersede the earlier guidance and will guide development for wind farms within the County during the lifetime of the GCDP 2009-2015.

This SEA and HDA have been prepared in tandem with, and have informed the draft WES. This WES builds upon existing guidance in the GCDP 2009-2015, taking account of updated national and regional planning guidelines, strategies and policy documents. It is also informed by issues of particular national, European and international environmental importance that have evolved, and are now accepted as being critical to the formulation and implementation of sustainable development, such as climate change, renewable and alternative energy.

This WES designates areas as being: a) Strategic Areas, b) Acceptable in Principle, c) Open for Consideration, and d) Not Normally Permissible. The total land area proposed as Strategic is 5,393 hectares and the area proposed as Acceptable in Principle is 6,515 hectares. The area identified as Open for Consideration is 108,000ha. Figure 5A presents the Wind Energy Areas as adopted by Galway County Council on 21st September 2011.

 Appropriate development of wind energy to help meet EU targets on renewable energy

The draft SEA ER provided baseline information on all the SEA parameters (Chapter Four) and Chapters Seven Impacts and Eight Mitigation Measures in particular addressed the above environmental issues.

Acknowledgements were received from the following agencies:

- Department of Communications, Energy and Natural Resources
- Office of the Minister for Agriculture, Fisheries and Food
- Office of the Minister, Environment, Heritage and Local Government
- Office of the Tánaiste and Minister for Education and Skills
- Minister for Enterprise, Trade and Innovation
- Dublin Airport Authority (no comment to make at this time)

Please note that certain functions have been transferred to different departments since the initial consultation took place – ie: transfer to Heritage to the Department of Arts.

2.1.1 SEA Scoping and Consultation

Following the screening process, a scoping exercise was undertaken by Minogue and Associates. This established the scope and extent of the Environmental Report and facilitated consultation with the designated statutory consultees- the EPA, DoEHLG and and the Department of Communications, Marine and Natural Resources (DCMNR). In addition, a further 16 non statutory consultees were consulted.

At the outset of the scoping process, statutory and non statutory consultees were consulted in the form of a letter outlining the new wind energy strategy, its intended lifespan, and a map showing the existing wind energy designations from the Galway County Development Plan 2005 to 2011. Thereafter, a number of informal follow up meetings took place with Galway County Council, the EPA and the National Parks and Wildlife Service (NPWS).

2.1.2 Environmental Issues raised during the scoping process

The Scoping Consultation document expressed the view that the draft WES has the potential to impact on a broad range of environmental components. Submissions were received from the following:

- EPA
- DoEHLG
- Inland Fisheries Ireland
- West Regional Authority
- Clare County Council
- Roscommon County Council
- Mayo County Council
- Shannon Airport
- Birdwatch Ireland
- Bat Conservation Ireland
- National Roads Authority

Key environmental issues that have been included in the SEA ER and adopted into the WES as appropriate include:

- Additional baseline information on fisheries and fish stocks including restoration of same at the Owenbolishka River catchment.
- Additional information on potential peat impacts
- Additional information on potential transboundary impacts

Additional mitigation measures including:

Section 8.3 Assessment of Environmental Impacts

- Additional detail required for EIA;
- listing of additional biodiversity legislation,
- additional requirement for yearly bird monitoring as appropriate,
- additional monitoring requirements,
- specific reference to the Lesser Horseshoe Bat
- notifiable actions in NHAs concerning peat removal or excavation
- further detail on buffer areas and consultation
- surface water management plans and peat depth surveys requirements

2.1.4 Public Submissions on the second draft of the WES, SEA ER and NIS.

During the meeting of Galway County Council on 21st July, a number of alterations were proposed by elected members on the draft Wind Energy Strategy (WES). The following amendments, not in accordance with the Manager's Report and Recommendations of 30th June 2011, were made by the elected members to the proposed WES at the Galway County Council meeting held on 21st July 2011.

The following Table A shows the proposed amendments and is accompanied by the SEA response as to whether this is recommended or not from the SEA perspective. Additionally, the NIS assessed the implications of these amendments from the Habitats Directive Assessment perspective.

Table A: Material amendments proposed by elected members at 21st July 2011 Galway County Council Meeting.

Amendment	SEA Response	SEA determination	WES
Section 4.2 Strategic Guidance on Landscape Capacity for Wind Energy Developments	The aim of the landscape guidance contained in the draft WES is to provide strategic level advice and therefore the site specific landscape impacts are more appropriately addressed at project level.	Accepted	Included in Adopted WES
Insert after first paragraph: <i>This</i> <i>guidance is intended as</i> <i>broad advice on</i> <i>landscape character</i> <i>areas and will need to</i> <i>be balanced against</i> <i>site-specific</i> <i>assessments of the</i>	This amendment is assessed as a neutral to positive impact in relation to landscape and therefore no mitigation measures are suggested for this amendment.		

after the final paragraph "The approach taken to the compilation of the Wind Energy Strategy is based on a consistent and robust methodology which was not varied to take account of individual planning permissions which have been fully assessed under HDA. However, any project which was subject to a planning application which has been granted permission following assessment of all factors including landscape capacity, it is considered that this project is consistent with and in full compliance with this Wind Energy Strategy".	individual projects which are better addressed through development control and Environmental Impact Assessment as appropriate. At SEA level it is problematic state individual projects are 'in full compliance' with the draft WES as this is more appropriately addressed at project not SEA level assessment.		WE2
Amend the designation on the areas of land on the attached map from "Acceptable in Principle" to "Not Normally Permissible".	This rezoning is likely to have a neutral to positive impact on many SEA parameters as it directs wind energy development from this particular area. It does dilute the WES methodology but has been proposed in response to concerns raised by the local community.	Accepted	Included in Adopted WES
Amend the designation on the lands which were the subject of Submission No.18 from "Not Normally Permissible" to "Open for Consideration	The overall target for 2020 in the WES for Open for Consideration areas is 30 MW, a target that is dispersed over a total county land area of 18%. The environmental impact of this rezoning is assessed as being largely neutral for many SEA parameters. However, this is better addressed at project level and therefore is not in the spirit of the SEA directive.	Accepted	Included in Adopted WES
Amend the designation on the lands which were the subject of Submission No 17 from "Not Normally Permissible" to "Open for Consideration".	The proposed rezoning of this area is not recommended as it is based on individual projects that are more appropriately addressed at project and Environmental Impact Assessment level. In addition, the proximity of this area to Clifden town, and other important tourism and recreational areas including Connemara National Park and Diamond Hill results in potential conflicts with landscape, human health and population and cultural heritage.	Not recommended	Included in Adopted WES
Amend the designation on the land which were	This amendment changes the designation of an area of land amounting 79.2ha from	Not recommended.	Not included in Adopted WES

- Fisheries
- Support for amendments to NIS
- Concerns that the WES is overly conservative and prescriptive
- Site specific considerations principally on landscape, tourism and ecological grounds.

Galway County Council members voted to adopt the variation on the 21st September. In terms of recommendations from the Managers Report, the elected members accepted all recommendations with the exception of Submission no.2 concerning lands north of Clifden. The SEA Addendum Report I did not recommend this be rezoned from Not Normally Permissible to Open for Consideration. The elected members rejected this recommendation and this area is now zoned as open for consideration.

On adoption of the Draft Plan, the Addenda were used to update the original Environmental Report into a final Environmental Report which will be made publicly available alongside the adopted WES.

Option 5 – Onshore	renewable energy development plan (OREDP) that has identified potential areas for offshore renewable around Ireland. Should recommendations arise from the finalised OREDP, these will be considered by GCC. Thus, while this option was not considered a realistic alternative to onshore wind energy development, it has been considered as part of the overall WES for County Galway. This scenario would direct wind energy developments to both on
and Offshore Wind	shore and offshore areas in and around County Galway as a means
Energy	of achieving renewable energy targets. It is unlikely that the County
Development	could achieve significant renewable energy production from off shore
	wind energy within the timeframe envisaged for this WES, however, there may be potential for a certain amount of off shore wind energy development and the WES has accordingly retained the flexibility to allow for offshore wind farm developments.
Option 6 –	This scenario would assess different renewable energy targets and
Alternative Targets	timeframes as a means of achieving a 2020 renewable energy target
and Alternative	of 40% electricity production from renewable energy resources. The
Timeframes	target of 500 MW has been developed in consideration of the
	technical, physical and environmental constraints facing wind energy
	development and in consultation with a number of agencies and represents a realistic target that can potentially be achieved over the
	lifetime of the WES.
Option 7 –	This is the approach taken by GCC in undertaking this work and SEA.
Strategic Approach	It recognises where the principal wind resources are and matches
to Wind Energy	them to existing infrastructure – two critical considerations for wind
Development	energy development. In addition, the identification of Strategic Areas
	and Acceptable in Principle Areas permits a comprehensive
	assessment of environmental resources within and close to these areas, facilitating a more robust SEA and HDA process that informs
	the WES development. It allows for a medium term view of wind
	energy developments in the County and encourages clustering or
	sharing of infrastructure associated with wind energy development
	such as access roads.
	In summary, the significant environmental and energy benefits would be as follows:
	 Facilitates a strategic and plan-led approach to wind energy
	development in the County. In turn, this permits the more
	accurate analysis of existing environmental resources,
	potential impacts and identification of mitigation measures
	 where necessary. Facilitates the avoidance of particularly sensitive resources
	where necessary. Allows for a cumulative assessment of wind
	energy developments within the County. Allows the County
	and potential investors a means to progress wind energy
	developments within robust strategic areas in the County,
	assisting the County in increasing renewable energy.
Following the selection	n of Option 7 Strategic approach, a number of spatial sub options were
	arger Wind Farm Clusters in Suitable Areas and Smaller Wind Farm
Developments in Pote	entially Suitable Areas was identified as the most appropriate. This

4 Frequency of Monitoring and Reporting

4.1.1 Introduction

It is proposed that the SEA monitoring reporting should go parallel with the reviewing of the County Development Plan 2009-2015. However, in some cases as data becomes available, the Planning Authority may prepare an additional SEA Monitoring Report, if it is deemed necessary, particularly if the new data and its spatial analysis identifies negative impact(s) on the environment. In turn, this list below is subject to review at each reporting stage to reflect new data.

Should the monitoring regime identify significant impacts (such as impacts on designated sites) early on in the WES implementation, this should trigger a review of the WES and monitoring regime. It is recommended that data arising from planning applications, particularly in terms of environmental constraints mapping and Environmental Impact Statements be integrated into the GIS and monitoring system. This will assist in assessing cumulative impacts also, in particular ecology, water quality and slope stability.

Finally, it is recommended that the monitoring report be made available to the public upon its completion. It is recommended that this data be shared with neighbouring local authorities to assist in monitoring transboundary effects should they arise.

Environmental Protection Objectives	Indicators	Targets	Data Source
Biodiversity, Flora & Fauna			
B1:Protect diversity and integrity of designated habitats and species and maintain wildlife	% Habitat Loss	No net loss of important habitats or wildlife corridors	NPWS/ GCC
corridors B 2:Protect aquatic environment	No. of significant impacts to aquatic environment. No depreciation of water quality attributed to wind energy developments	No Significant impacts	EPA/NPWS/GCC
B3 Avoid significant adverse impacts (direct, cumulative and indirect) to protected habitats, species or their sustaining resources in designated sites by	No. of significant adverse impacts to relevant habitats and species in designated heritage sites	No significant adverse impacts to habitats, species or sustaining resources	GCC/NPWS

Table C Monitoring Programme

waters (including	energy construction	quality due to wind energy	
coastal and estuarine)		development	
from wind energy			
developments			
Population and		and the state of the second second	di hotore e sta
Human Health			
PH1:Ensure local and neighbouring communities benefit economically from wind energy developments in the defined areas	No. of construction jobs sources from local area. Establishment of community fund	% total jobs from local area. Amount paid into community fund	GCC/HSE
PH 2:To protect human health from hazards or nuisances arising from wind energy developments specifically noise, shadow flicker, visual impacts and temporary construction impacts	Occurrence of spatially concentrated complaints in regard to environmental nuisances (eg; noise complaints, shadow flicker)	No spatial concentration of health problems or nuisance arising from environmental factors and wind energy developments	
Landscape			
L1: To protect the county's unique and special landscapes, from negative wind energy development impacts	Degradation of unique or special landscapes due to negative visual impacts associated with wind energy	No significant degradation of unique or special landscapes due to negative visual impacts associated with wind energy	GCC
L2: Minimise visual impacts of wind farm developments through appropriate design and siting	Degradation of landscape features and character from wind energy	No degradation of valued landscape features and no significant adverse impact on landscape quality of unique or sensitive landscapes	
Cultural Heritage			
CH1:Protect and conserve archaeology resources in relation to wind energy developments	No of applications granted resulting in full or partial loss of entries to the RMP	No developments to result in full or partial loss of such sites	GCC/DoEHLG
CH 2:To preserve and protect the special interest and character of the county's architectural heritage in relation to wind energy developments	No of applications addressing impact of wind energy development on setting of ACAs or protected structures where relevant.	No wind energy developments to significantly impacts on settings of ACAs and protected structures	

national grid in a sustainable manner MA 8: Ensure that renewable energy developments do not impact negatively on existing wastewater treatment plans	designated sites, or water resources No decline in water quality arising from impacts to wastewater treatment plans	No adverse impacts to wastewater treatment plants in defined areas.	
MA 9: Prevent development on lands that pose a significant flood risk	No development for wind energy permitted on known flood risk lands	No flooding incident arising from development on flood risk lands	

4.1.2 Conclusion

The WES sets out an overall strategy, policies and objectives for Galway County Council to promote wind energy development in appropriate areas whilst providing the most appropriate development management guidelines. The SEA and Habitats Directive Assessment (HDA) have informed the WES through an ongoing iterative process that incorporated environmental considerations and sensitivities throughout the strategy development. The SEA and HDA has been undertaken in line with the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 to 2011. Subject to the full and proper implementation of the mitigation measures outlined in the SEA ER and Natura Impact Statement including appropriate site level investigations, it is considered that significant adverse impacts on the environment will be avoided.



































