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REPDF Revised Scoping Submissions  
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13<sup>th</sup> March 2019

Our Ref: SCP190202.1

**Re. Revised SEA Scoping of the Reactivated Renewable Electricity Policy and Development Framework**

Dear Mr Noonan,

We acknowledge your notice, dated 14<sup>th</sup> February 2019, in relation to the Reactivated Renewable Electricity Policy and Development Framework (the REPDF) and the accompanying Revised Strategic Environmental Assessment (SEA) Scoping Report.

The EPA is one of five statutory environmental authorities under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.

We welcome the reactivation of the REPDF as a key national plan for guiding and optimising the opportunities for renewable electricity development on land in Ireland. Expansion of renewable electricity is a core element of Ireland's national transition to progress towards meeting our various climate, energy and air quality obligations.

Our responses to the questions posed in the Scoping Report are provided below, along with additional key comments and recommendations. Our comments focus in particular on the EPA's remit and areas of expertise, including climate change, air, noise, water and the inter-relationships between these and other relevant topics e.g. biodiversity. Some relevant environmental resources are listed in Appendix I to this submission. We also include as a separate attachment our previous scoping submission dated 22 April 2016, the relevant aspects of which should also be considered as part of this submission.



## **Key Comments and Recommendations**

### *Governance and Implementation*

The REPDF should include clear, robust and transparent implementation arrangements and governance structures, including clear lines of responsibility for delivery and provisions for interim review and progress reporting. The relationship between the REPDF and the forthcoming Regional Spatial and Economic Strategies should be clarified. Implications of the REPDF for existing Local Authority renewable energy strategies should also be clarified.

We recommend linking the monitoring and reporting on the implementation of the REPDF with the environmental monitoring required under the SEA Directive, so that the wider environmental effects of implementing the REPDF (including positive effects) can be evaluated and reported on. Figure 3.2 in the Scoping Report, illustrating the integration of the Framework, AA and SEA processes, could be updated to include the ex-post implementation and SEA monitoring.

### *Community Engagement*

The importance and value of community engagement is one of the key messages from our most recent State of the Environment Report (EPA, 2016). In this regard, the need to proactively engage local communities and citizens and to place citizens at the heart of decision-making in relation to the energy transition, should be a core consideration in preparing the REPDF and in carrying out the SEA (including developing alternatives). As suggested below in response to Question 4, this could include exploring different investment/ownership models as part of the alternatives assessment, or other measures to ensure that the potential for community benefits of renewable developments are maximised. While we note that promoting microgeneration is not envisaged as a main component of the Framework, notwithstanding this the REPDF should acknowledge the important role of microgeneration as a key enabler in involving and empowering citizens to be active participants in the energy transition (energy citizens), in turn ensuring the transition happens faster and more smoothly. In this context, measures to facilitate and promote microgeneration by citizens and measures to maximise the community benefits of renewable developments (including the potential for community ownership/part-ownership) could be considered as part of the SEA alternatives assessment.

### *Sustainable Development Goals*

The REPDF should be consistent with, and contribute to achieving, the UN Sustainable Development Goals, in particular 'Goal 7. Ensure access to affordable, reliable, sustainable and modern energy for all' and 'Goal 13. Take urgent action to combat climate change and its impacts'. Ireland's SDG Implementation Plan (DCCA, 2018) includes specific targets and actions which should be integrated as appropriate into the REPDF. This is with a view to ensuring that the Framework is developed within the context of the wider environmental protection and sustainable development targets.

### *State of the Environment Report – Ireland's Environment 2016*

We welcome that the key messages from our most recent State of the Environment Report (EPA, 2016) are referred to in the Scoping Report. Addressing and implementing these key actions, which are also linked to a number of the UN's Sustainable Development Goals, will



be important in delivering environmental protection and promoting sustainable development in Ireland as part of the national transition. It will ensure that future renewable energy development is planned and managed within the context of the wider environmental protection and sustainable development agenda.

## **Responses to Scoping Questions**

### **Q1. Based on the plans, policies and programmes outlined, are there any other key relevant international, national or regional plans, policies or programmes that should be considered in the SEA Environmental Report on the Renewable Electricity Policy and Development Framework?**

We acknowledge the comprehensive list of plans, programmes, policies and legislation included in the Scoping Report. In preparing the SEA Environmental Report, it would be useful to include an additional column, clarifying the relevance of each plan to the REPDF. There may also be merits in grouping plans by topic/thematic area.

Additional plans to consider include the National Air Pollution Control Programme, currently being prepared by DCCA, which will describe the pathway that Ireland will follow to achieve compliance with the National Emission Ceilings (NEC) Directive and associated emission targets for both 2020 and 2030. It will set out policy options, actions and measures to achieve compliance with emission targets for five specified air pollutants (NO<sub>x</sub>, VOCs, SO<sub>x</sub>, PM<sub>2.5</sub> and NH<sub>3</sub>) across sectors but, in particular, the residential, transport, agricultural and energy sectors.

In addition to the National Peatlands Strategy, additional peatland-related plans to consider, as relevant, include the National Raised Bog SAC Management Plan (DCHG, 2017), Bord na Mona's Strategic Framework for the Future Use of Peatlands and Bord na Mona's Biodiversity Action Plan 2016-2021.

With regards climate adaptation and resilience, existing or forthcoming sectoral adaptation plans for the electricity sector should be considered, as should relevant local authority adaptation strategies. It should be noted that the National Climate Change Adaptation Framework 2012 has now been replaced with the 2018 NAF.

It should be noted that the National Policy Framework on Alternative Fuels Infrastructure for Transport in Ireland 2017 to 2030 was published by DTTAS in 2017 and the status of the EirGrid Draft Grid Implementation Plan 2017-2022 should be clarified.

The forthcoming All-of-Government Climate Action Plan, which is expected to be step up Ireland's ambition in responding to climate change, should be referred to and integrated, as relevant, upon publication.

### **Q2. Based on the likely significant impacts outlined above, are there any other effects or impacts that should be considered in the SEA Environmental Report on the REPDF?**



The proposed scope of the assessment, as outlined in Section 5 of the Scoping Report, is comprehensive.

In relation to impacts on water quality, the potential for impacts on high-status water bodies should be considered. Many of Ireland's remaining high-status rivers are located in upland peatland areas and are particularly vulnerable to disturbance. The protection and restoration of high-status waters is one of the main priorities identified in the River Basin Management Plan for Ireland 2018-2021. This should be reflected, where relevant, in the Framework.

We suggest that Noise and Air Quality could be included as separate issues.

In relation to Climatic Factors, the need to ensure the resilience of renewable electricity infrastructure to the impacts of more extreme weather merits consideration.

In relation to Population and Human Health, the REPDF should seek to optimise the community benefits of renewable electricity developments. The need for community engagement/buy-in links with issues around equity and the need to ensure a just transition that avoids 'winners and losers'. Other socio-environmental issues such as fuel poverty and security of supply, which also links with the UN SDGs, may also be relevant to consider as part of the preparation of the Framework and SEA process.

Under Population and Human Health, consideration should also be given to the potential for positive health impacts associated with displacing fossil fuel power generation.

In relation to Landscape, it will be important to consider the potential for cumulative impacts in a given area (particularly of wind farms). The REPDF should seek to avoid or reduce the potential for significant adverse cumulative impacts on landscape/visual amenity.

The potential for impacts on recreation / tourism should be considered, both in terms of visual intrusion of RE and associated grid infrastructure such as overhead lines/substations, but also possibly arising from access restrictions.

### **Q3. Do you have any comments regarding the draft SEA Objectives presented?**

*Population and Human Health:* the reference to 'sustainability (sic) development principals (sic) which seek to grow populations...' is unclear. This objective should be worded to reflect the need to ensure that renewable electricity developments are planned, constructed and operated in a manner that avoids or minimises adverse impacts on local residents/communities and maximises the community benefits of such developments. In addition, the reference to human health could be expanded to also include well-being.

Given the relevant of this topic in the context of the Framework, this objective could be expanded to include more than one sub-objective, encompassing the considerations outlined above.



*Air Quality*: we recommend addressing noise as a separate topic / objective, for clarity.

*Landscape*: landscape/visual impact are key considerations for the REPDF and the wording of this objective could be expanded to better reflect these aspects.

**Q4. Do you have any suggestions or comments in relation to the overall approach to alternatives?**

The promotion of different types of investment/ownership models for renewable electricity developments could be explored as part of the alternatives assessment. This could include approaches/options such as community part-ownership, public-private partnerships etc. This is important in the context of engaging/empowering local communities and seeking to maximise the community benefits of renewable electricity developments, as well as ensuring the energy transition happens quickly and smoothly.

As previously mentioned, the potential for microgeneration to play a more significant role in contributing towards Ireland's renewable targets could also be considered as part of the alternatives assessment. This is in the context of recognising that microgeneration can act as a key enabler in terms of involving citizens in the energy transition, aligning with the principles of sustainable development and several of the UN SDG.

**Available Guidance & Resources**

Our website ([www.epa.ie/pubs/advice/ea/](http://www.epa.ie/pubs/advice/ea/)) contains SEA resources and guidance, including:

- SEA process guidance and checklists
- list of relevant spatial datasets
- topic specific SEA guidance, such as consideration of alternatives in SEA.

Good practice guidance on [Integrated Biodiversity Impact Assessment](#) and [Developing and Assessing Alternatives in Strategic Environmental Assessment](#) is also available.

***Environmental Sensitivity Mapping (ESM) Tool***

The EPA-funded Environmental Sensitivity Mapping (ESM) tool is useful for identifying, at a strategic level, environmentally sensitive areas and providing a visual overview of the relative sensitivity of areas. As such, the ESM tool can support the spatial analysis aspects of the REPDF. It can be particularly useful for assessing cumulative and in-combination effects on the environment. We expect the ESM Tool to be publicly launched in mid-2019. The ESM tool has the potential to inform more evidenced-based planning and decision-making at national, regional and local authority level and, as such, we would also welcome if the REPDF also promoted the use of ESM in lower tier regional or local authority level renewable energy strategies / development plans as part of the implementation of the REPDF. This would help to reinforce the importance of putting the environment at the heart of planning. It should be noted that the tool is not designed for use at a project level.



### ***Bird Sensitivity Mapping Tool***

BirdWatch Ireland have prepared a bird wind sensitivity mapping tool for wind energy developments, part funded by the EPA. This is a pre-planning tool to assist developers/planners/ecologists to understand the sensitivity of selected bird species. The tool does not create 'no-go' areas but rather can be used to inform the appropriate siting of wind energy developments. It is hosted on the National Biodiversity Data Centre live maps. See the link below for more information on this tool.

[www.birdwatchireland.ie/OurWork/PolicyAdvocacy/BirdSensitivityMapping/tabid/1312/Default.aspx](http://www.birdwatchireland.ie/OurWork/PolicyAdvocacy/BirdSensitivityMapping/tabid/1312/Default.aspx)

### **Environmental Authorities**

Under the SEA Regulations, you should also consult with:

- The Minister for Housing, Planning and Local Government
- Minister for Agriculture, Food and the Marine, and the Minister for Communications, Climate Action and Environment, where it appears that the plan or programme, or modification of the plan or programme, might have significant effects on fisheries or the marine environment, and
- where it appears that the plan or programme, or amendment to a plan or programme, might have significant effects in relation to the architectural or archaeological heritage or to nature conservation, the Minister for Culture, Heritage and the Gaeltacht.

The EPA welcomes the opportunity to comment at this stage of the REPDF and SEA process and we will continue to engage as the REPDF and the SEA Environmental Report are progressed. We will also provide further comments upon receipt of the Draft Plan and SEA Environmental Report and associated documents during the next statutory consultation phase of the Plan and SEA Process.

Should you have any queries or require further information in relation to this submission, please contact me directly.

I would be grateful if an acknowledgement of receipt of this submission could be sent to: [sea@epa.ie](mailto:sea@epa.ie).

Yours sincerely,

A handwritten signature in black ink that reads "Tara Higgins".

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Dr Tara Higgins  
SEA Section, Office of Evidence and Assessment

## Appendix I – Some Key Environmental Resources

Air Quality	<a href="http://www.epa.ie/air/quality/data/">http://www.epa.ie/air/quality/data/</a> (air quality data) <a href="http://www.epa.ie/pubs/reports/air/quality/">http://www.epa.ie/pubs/reports/air/quality/</a>
Biodiversity	<a href="http://www.npws.ie/guidance-appropriate-assessment-planning-authorities">http://www.npws.ie/guidance-appropriate-assessment-planning-authorities</a> <a href="http://www.npws.ie/publications">http://www.npws.ie/publications</a> <a href="http://maps.biodiversityireland.ie/#/Home">http://maps.biodiversityireland.ie/#/Home</a> <a href="http://www.epa.ie/pubs/reports/research/biodiversity/">http://www.epa.ie/pubs/reports/research/biodiversity/</a>
Climate & GHGs	<a href="https://www.climateireland.ie">https://www.climateireland.ie</a> <a href="http://www.epa.ie/climate/emissionsinventoriesandprojections/">www.epa.ie/climate/emissionsinventoriesandprojections/</a> (EPA data on Greenhouse Gas Emissions and Projections) <a href="http://www.epa.ie/pubs/reports/research/climate/">http://www.epa.ie/pubs/reports/research/climate/</a> (climate research reports) <a href="https://www.dccae.gov.ie/en-ie/climate-action">https://www.dccae.gov.ie/en-ie/climate-action</a>
DHPLG Guidelines	<a href="https://www.housing.gov.ie/planning/development-management/planning-guidelines">https://www.housing.gov.ie/planning/development-management/planning-guidelines</a>
EIA	<a href="https://www.housing.gov.ie/planning/environmental-assessment/environmental-impact-assessment-eia/eia-portal">https://www.housing.gov.ie/planning/environmental-assessment/environmental-impact-assessment-eia/eia-portal</a> (new EIA portal)
Flood Risk	<a href="http://www.floodinfo.ie">www.floodinfo.ie</a>
Landscape Character Assessment	<a href="http://www.heritagecouncil.ie/">http://www.heritagecouncil.ie/</a>
Noise Maps	<a href="https://gis.epa.ie/EPAMaps/">https://gis.epa.ie/EPAMaps/</a> (round 3 noise maps)
SEA resources	<a href="https://gis.epa.ie/EIS_SEA/">https://gis.epa.ie/EIS_SEA/</a> (SEAGIS Tool) <a href="http://www.epa.ie/monitoringassessment/assessment/sea/resources/">http://www.epa.ie/monitoringassessment/assessment/sea/resources/</a> (SEA resources and guidance)
Spatial Planning GIS	<a href="http://www.myplan.ie">www.myplan.ie</a> <a href="http://www.epa.ie/soilandbiodiversity/soils/land/corine/">http://www.epa.ie/soilandbiodiversity/soils/land/corine/</a> <a href="http://gis.epa.ie/SeeMaps">http://gis.epa.ie/SeeMaps</a>
State of Environment	<a href="http://www.epa.ie/irelandsenvironment/stateoftheenvironmentreport/">http://www.epa.ie/irelandsenvironment/stateoftheenvironmentreport/</a>
Water Quality	<a href="http://www.catchments.ie">http://www.catchments.ie</a> <a href="https://wfd.edenireland.ie/">https://wfd.edenireland.ie/</a> <a href="http://www.epa.ie/pubs/reports/water/waterqua/">http://www.epa.ie/pubs/reports/water/waterqua/</a>
Waste Management	<a href="http://www.epa.ie/pubs/reports/waste/">http://www.epa.ie/pubs/reports/waste/</a>