

Irish Wind Energy Association,
Sycamore House,
Millennium Park,
Osberstown,
Naas,
Co. Kildare.

Department of Environment, Community and Local Government,
Custom House,
Dublin 1,
DO1 W6X0.

29th October 2015

By email to NationalMitigationPlan@environ.ie

Re: Public Consultation on SEA Scoping Report for National Mitigation Plan

Dear Sir/Madam,

The Irish Wind Energy Association (“IWEA”) is Ireland’s leading renewable energy representative body and as such has an active interest in the potential for renewable energy, and in particular wind energy, in Ireland. IWEA works closely as a stakeholder in the work of the Department of the Environment, Community and Local Government (DECLG) and so feels it is important to make a submission on the SEA Scoping Report for the National Mitigation Plan (NMP), published on 1st October 2015.

This submission builds on IWEA’s July 29th (2015) submission to the Department on the Development of Ireland’s First National Low Carbon Transition and Mitigation Plan.

IWEA is firmly of the view that Irish wind energy as our leading renewable energy asset can, alongside other Irish renewables, make a continued valuable contribution to this national transition agenda and deliver a cost effective renewable option for Ireland’s homes, communities and businesses.

The SEA Scoping Report, in Section 3, provides a clear overview of the Strategic Environmental Assessment process, which is useful in explaining where the SEA and the current Scoping Document fits into the overall process. Such an overview is welcomed and useful in providing context for the Scoping Report and the SEA.

Section 4 of the Scoping Report, lists other relevant plans and programmes to be considered in terms of potential interactions with the NMP and guidance to be followed in the preparation of the SEA. The listed plans, programmes and guidance appear comprehensive.

Section 5 of the Scoping Report, detailing the intended Scope of the SEA lists some example types of impacts to be addressed in the Environmental Report.

IWEA suggests that it is also important to acknowledge, the potential impacts of the “Do Nothing Scenario” in the Environmental Report, that is, if the National Mitigation Plan were not to be implemented. The prospect of not implementing the NMP, or not implementing the NMP in full in line with legislative requirements and policy commitments, also has significant potential environmental effects which cannot be ignored. The likely consequences of unabated climate change are well documented, and it is not intended to repeat them in this submission. However, it should be acknowledged that any potential impacts arising from the NMP’s implementation should be balanced with the serious negative impacts of taking no action.

The significant environmental issues and their potential to occur, listed in Table 5.1 (column 3) of the Scoping Document, largely focusses on assessing potential undesirable effects. While it is acknowledged that no assessment is made as to whether potential issues/effects will be positive or negative in the Scoping Document, and this will be a matter for consideration in the preparation of the Environmental Report, it is respectfully suggested that the Environmental Report should also make every effort to scrutinise and clearly outline the potential positive impacts which would accrue from implementing the NMP in full.

IWEA looks forward to reviewing the Environmental Assessment and Report to be published as the next stage in the preparation of the SEA of the NMP. IWEA will consider the Environmental Assessment and Report when it is published, and intends to make a further submission when the opportunity arises.

We very much welcome this opportunity to make a submission and look forward to engaging constructively with you in the future as this proceeds.

Yours sincerely,

**sent by email, bears no signature*

Brian Dawson
Head of Communications
Irish Wind Energy Association