

**Consultation on Climate Change (Infrastructure Planning)
(Environmental Impact Assessment) (Application) Order 2023**

Closing Date: 16th February 2024

Douglas City Council Response

THE CLIMATE CHANGE ACT 2021

Do you agree with the proposal to apply over these UK Regulations in respect of the preliminary stages of application preparation, specifically in relation to the Environmental Impact Assessment process?

Yes.

Please explain your view:

It is important the Isle of Man has a legal framework for this type of activity and the UK legislation is well researched.

Do you agree with the proposed extent to which these Regulations will apply?

Yes.

Please explain your view:

Seems logical.

Do you agree with the limited, proposed controlled marine activities (and associated marine activities) that the Regulations will apply to?

Yes.

Please explain your view:

Seems logical.

Do you agree that these Regulations should provide a mechanism that recognises pre-application work to be taken into account when the Marine Infrastructure Management Act 2016 is fully enacted?

Yes.

Please explain your view:

Seems logical.

ENVIRONMENTAL IMPACT ASSESMENT (EIA)

Do you agree with what is being proposed for inclusion within the Environmental Impact Assessment process?

No.

Please explain your view:

The EIA should also describe and assess the installation and operating greenhouse gas emissions and impact on climate change. No scheme should be allowed to progress if is contrary to or contradicts the Isle of Man Government's Climate Change Act and road map. The EIA should consider the holistic environmental impact of any proposed scheme.

SCOPING OPINION

With regards to what is being proposed in respect of Scoping Opinions, do you agree with what the Regulations will contain?

Yes.

Please explain you view:

Seems logical.

CONSULTATION

Do you agree with what is proposed to be included with regards consultation for an application which requires an EIA to be submitted?

Yes.

Please explain your view:

Seems logical.

EXEMPTIONS

Do you agree that the Council of Minister should have the power to exempt a controlled marine activity from the requirements of these Regulations in exceptional circumstances?

No.

Please explain your view:

Although there is an existing precedent within planning legislation, the Council does not consider it appropriate that any marine activity scheme should be exempted from having an EIA. If the proposed scheme is significant and of national importance, CoMin should arrange for an independent assessment of the holistic environmental impacts before determining any application. Approving applications without any understanding of the potential environmental impacts would not be in the Island's best interests in the longer term.

CONSEQUENTIAL AMENDMENT

Do you agree with this proposed consequential amendment?

Yes.

Please explain your view:

Seems logical.

SUPPLEMENTARY PROVISION

Do you agree with the inclusion of this supplementary provision?

Yes.

Please explain your view:

Seems logical.