

To : An Coimisiun Pleanála

From: Kevin Loftus , Keerglen, Ballycastle, Co Mayo F26DD53

Contact Details: 086-1632565

E Mail Address : loftusp@gmail.com

Re: Further Submission on Glenora Windarm, Glenora, Ballycastle, Co Mayo.

Planning Ref: 318701

Date: 20/01/2026

Attached:

- 1) Copy of letter from An Bord Pleanála dated 26/02/2024 acknowledging my first submission.
- 2) Second submission dated 20/01/2026

Our Case Number: ABP-318701-23



An
Bord
Pleanála

Kevin Loftus
Keerglen
Ballycastle
Co. Mayo
F26DD53

Date: 26 February 2024

Re: 10 year planning permission for the proposed wind energy development consisting of 22 wind turbines and all associated infrastructure located in the townlands of Glenora, Altderg, Keerglen, Ballykintetragh, Ballycastle, Ballyglass, Killeena, Glencullin and Lugnalettin, Co. Mayo. (www.glenorawfplanning.com)

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,


Lauren Murphy
Executive Officer
Direct Line: 01-8737275

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T0 : An Coimisiun Pleanála,

Re: Further Observations Glenora Windfarm. Your planning reference :318701

From: Kevin Loftus, Keerglen, Ballycastle, Co Mayo.

Date: 18/01/2026

I already made observations on this development when the application was first lodged in Dec 2023. I now wish to make the following additional observations:

1) Failte Ireland in their submission refer to visitor attitudes towards the construction of windfarms on the landscape. They refer to surveys undertaken in 2012 and 2018. MKO reply by stating "Most visitors are broadly positive towards the idea of building wind farms in Ireland".

It is fair to say attitudes would significantly change if those surveys included in their questioning this specific development and what the attitude or response would now be to building large scale industrial turbines across the hills of North Mayo that contain the oldest archaeological field systems in the world preserved underneath the peat known internationally as The Ceide Fields complex. This would be akin to asking visitors to Egypt what their attitude would be to construct large industrial turbines in and around the pyramids which of course are not as old as the under peat field systems of North Mayo. An Commisiun Pleanala (ACP) must satisfy itself of the extent of the Ceide Fields complex (it is not just confined to the area around the visitor centre) that extends across the hillsides of North Mayo from Blanemore in Moygownagh north via Keerglen, Ballykinlettragh and Glenora itself all the way to the Ceide Fields visitor centre and across easterly to Lacken. This can only be achieved by direct consultation with experienced archaeologists from the Ceide fields itself and not any other body who have chose to ignore this up until now. It is well established that surveying carried out in the past by experienced archaeologists from the Ceide Fields itself using their own unique probing technique revealed the under peat field systems at Ballykinlettragh and Ballinglen hills adjacent to Glenora. Those surveys were voluntary and limited by the resources available to them yet they proved the existence and extent of the Ceide fields complex **wherever they surveyed**. The Glenora site was not probed by Ceide Fields archaeologists but it is generally assumed the field systems also exist under the forested peatlands in Glenora. An Commisiun Pleannal should verify this with archaeologists from the Ceide Fields itself who know the area and are subject matter experts in this line of work. The archaeological integrity of this whole North Mayo area should be preserved due to its worldwide significance and ACP has a duty of care to ensure the neolithic landscape that includes Glenora and surrounding hillsides remain intact in their current form and are not industrialised. The visual impact of constructing wind turbines across the **neolithic skyline** of this part of North Mayo is not alone an affront to the visual amenity of the area but also to the archaeological heritage of this area. The Co Dev plan sets out to protect the heritage of the county including the Ceide Fields complex and boglands of North Mayo.

2) The renewable energy strategy for Mayo outlines areas considered suitable for windfarms as tier one and Tier two areas open for consideration for windfarms. The developer seeks to build

15 turbines in an unspecified area outside of Tier One and Tier two which is also in the most archaeologically sensitive area in the country. This is contra to the renewable energy strategy and Co Dev plan and should be refused for that reason.

3) Please refer to my first submission to ACP in relation to peat slippage.

This area of North Mayo is seriously prone to peat slippage with the last known one in this area occurring within the Glenora site in 2022 (picture included). Nearby and just outside the border in Keerglen was a serious slippage in 1950's which deposited peat onto farmland in the Keerglen/Ballinglen valley as the slippage made its way to the sea at Ballycastle. Slippage has also been observed near Turbines 5/6 in the proposed Keerglen windfarm adjacent to Glenora. This application is the subject of an appeal with ACP at present (Planning Ref: MCC 2460537)

MKO have since made observations in relation to the high risk peat slippage raised by myself and other bodies and third party observers. I list hereunder some of the points raised by those submissions and MKO/FT own responses to those observations:

a) Third Party Observation:

Third Party Peat slippage is known to have occurred locally. The November 2022 slippage event/bog burst occurred within Glenora Boundary. Not recorded by GSI Ireland on their maps and it is unclear whether it has been reported to them.

MKO/FT Response

This slippage is discussed in Section 3.3.1 of Appendix 8-1 of the EIAR.

My Response To Mko.

GSI have not recorded this event yet on their maps. It is within the windfarm site. **Please see attached Appendix with Photo one showing evidence of a slippage event in afforested area in Glenora 2022.**

b) Third Party Observation:

Site walkovers conducted during driest months. No data from MKO side. No winter month data.

Mko/Ft response

While the site visits were undertaken during drier months, the peat stability assessment (Appendix 8-1 of the EIAR, undertaken following the guidance in Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Scottish Executive, 2nd Edition, 2017)) assumes a groundwater level at ground surface for the drained stability assessment, which assumes that the peat is fully saturated, which is considered to be a "worst case" when analysing peat stability.

My Observation:

MKO/FT confirm no walkover survey over the winter months was carried out when peat would be at its most saturated and ground conditions could be assessed. They confirm they "assume a groundwater level" but no trial holes or physical onsite analysis/testing of ground conditions during the wettest time of the year appears to have been carried out which is very concerning. This is a desk survey as such and it is further concerning when they confirm the trigger for peat slippage at Dawn of Hope was high rainfall which is very relevant to the Keerglen/Glenora boglands. As pointed out in my previous submission this area (Glenora & Keerglen) is especially prone to flash flooding which discharges down the Glenora slopes into Keerglen River causing extensive flooding in the Keerglen & Ballinglen valley often cutting off villages from access to the main Crossmolina/Ballycastle road. Photographs of this flooding have been previously

provided and further evidence of flash flooding can also be provided much close to the windfarm site. With high rainfall and flash flooding comes high risk of peat slippage especially in an area already prone to slippage. In the adjacent Keerglen windfarm application which is on appeal with ACP slippage was also confirmed near Turbines 5/6. As a landowner previously affected by peat slippage events I am seriously concerned that there will be another slippage event with resulting damage to property during construction or in the years ahead as a result of the major groundworks and disturbance proposed with this development were it to go ahead.

c)Third Party Observation

Reference to peat stability related concerns raised by Inland Fisheries Ireland in their response to the EIAR Scoping request.

MKO/FT Response:

A detailed peat stability assessment has been undertaken across the site (see Appendix 8-1 of the EIAR). The Authors undertook the peat stability assessment following the principles in Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Scottish Executive, 2nd Edition, 2017). This Guide is used in the peat stability assessment (Appendix 8-1 of the EIAR) as it provides best practice methods to identify, mitigate and manage peat slide hazards and associated risks in respect of consent applications for electricity generation projects. Reference to Meenbog/Dawn of Hope (Boleybrack): both of these failures have been considered when undertaking the peat stability assessment, as stated in the report text (Section 2.3 of Appendix 8-1 of the EIAR). The lessons learned from both peat slide events have been incorporated into the design of this project and the construction methodologies to be implemented.

The trigger for the failure at Dawn of Hope was an intense rainfall event (the equivalent of one month's worth of rainfall in 24 hours) and the concentration of runoff from forestry drainage into an area of saturated, deep (3-5m), relatively weak, peat. Such intense rainfall events cannot be avoided; however, the impact of these naturally occurring events will be mitigated by ensuring that all existing forestry drainage is maintained during the construction stage of the Proposed Development to avoid blockages and water build-up, especially in deeper peat areas.

Discharge of water from settlement ponds will be through controlled diffuse release onto peat, as outlined in the Surface Water Management Plan (SWMP) (Section 2.2, 2.5 of the SWMP).

The failure at Meenbog occurred on a section of floating road being constructed on a convex break in slope, downslope from a large area of deep (c.3m), low strength peat.

My Observation::

Mko make reference in their reply to Meenbog and Derrybrien peat slides in Ireland. They reference the Scottish guidelines for assessing peat slippage for proposed Electricity generation Developments (Scottish Executive, 2nd Edition 2017) and confirm "this guide is used in the peat stability assessment (Appendix 8-1 of the EIAR) as it provides best practice methods to identify, mitigate and manage peat slide hazards and associated risks"

The guidelines are dated 2017. Meenbog occurred in 2020 with forestry trees transported down the hill-side. The afforested terrain is very similar to Glenora. A major slippage occurred on an SSE site in Shetland, Scotland in May 2024. It was reported (Herald Scotland 27/05/2024) that the "catastrophic slide, which luckily caused no casualties, resulted from the disturbance of the peat bog during ongoing construction work on the Viking wind farm".

In July 2022 another SSE Renewables development at Mid Kammes Ridge, Shetland, Scotland had another peat slippage event. Those events all took place since the 2017 guidelines were published which further questions the methodology of the desk assessment used in Glenora based on those guidelines. Mko state that the GSI susceptibility rating is only a base line in respect of assessing the risk of peak slippage instead opting to place greater emphasis on the

methodologies referred to in the Scottish guidelines which did not stand up if applied in the aforementioned projects. Peat is a volatile material made worse by heavy rainfall and gradient which in Glenora much is >10% slopes. GSI have not been asked to provide an independent revised peatslide susceptibility rating of the area taking into consideration the nature of the proposed works which includes quarrying, drilling, road building, drainage and possibly pile driving. This project should not go ahead as the risk of peat slippage is far too high with major risk to the local environment and landowners property downstream. Planning permission was correctly refused on this site previously and one of the reasons was risk of peat slippage. The risk associated with this project is much greater on this occasion given the enormity of the turbines and scale of the project itself. ACP should itself carefully evaluate the high probability of peat slippage in this site and surrounding area and satisfy itself there will be no repeat of Derrybrien and Meenbog or the Scottish peatslides.

4) Visual Amenity:

Glenora itself and surrounding hill-sides form a neolithic skyline in this unique part of North Mayo which preserves the under peat field systems unique to the Ceide Fields complex. Glenora is visible in its current state from Downpatrick Hd To Ceide Fields and the construction of large 180 meter turbines does not fit with the visual amenity of this area given its historical and archaeological background not to mention the importance of this area to tourism as highlighted by Failte Ireland. ACP should refuse this project on the grounds of visual amenity with regard to the above.

5) Borrow Pits/Quarrying

The developer intends to extract material on site for the purpose of road building and turntable areas. This should be treated as a quarrying activity and therefore subject to the same legislative requirements 'extraction of minerals' as set out in the Planning Regulations 2001 (as amended) and the European Communities (EIAR REG 2012 s.i No 352 of 2012). ACP should completely satisfy itself that no unauthorised quarrying/ extraction of minerals is allowed onsite that does not meet the legislative requirements as set out in the aforementioned planning regulations and EIAR impact EC regulations.

6) Storage of Peat.

Under this proposed development it is planned to remove a substantial amount of peat and store it onsite by stockpiling and eventually deposit the excavated peat in pits/quarries which have been quarried out for road building. This is essentially landfilling of waste onsite which contravenes the Waste Management Act 1996 or Article 28 Regulations. To dispose of peat properly and to comply with waste management regulations the peat must be removed onto an authorised EPA licensed facility. All movements should be in line with waste management regulations SI No, 2004 and waste management (collection permit) regulations 2007-S.I No 820 of 2007.

In reaching their decision ACP should satisfy itself that all waste disposal regulations are correctly applied to the disposal and storage of the excavated peat and the correct licensing is obtained to meet the environmental regulations.

7) Flooding

I raised in my first submission the issue of flash flooding along the Keerglen/Glenora area which the Keerglen River basin drains. **Photo Two on the attached Appendix shows Keerglen River**

overflowing its high riverbanks during one of those floods. The banks are over 5ft high and the photo was taken just over 2km from the windfarm. The NPWS have raised the issue of the effect the additional drainage necessary for this development will have on the nearby Inagh boglands NHA. Ummerantarry NHA is also adjacent to Glenora . This development is situated in a highly sensitive heritage area adjacent to two NHA's and the nearby Glenamoy SAC. The resulting works in this development will result in increased run off from the Glenora slopes into Keerglen and Altdearg Rivers . This will not be manageable especially during periods of high rainfall and flash floods which already are a yearly occurrence on two or three occasions. No proper independent flood risk assessment has been carried out of this area and there has been no consultation with locals in relation to their current experience with flash flooding and being cut off from public access and emergency services.. This project will only serve to make this situation worse. The flooding continues all the way along Ballinglen River isolating the local villages and also causes flooding at Milltown , Ballycastle before it enters the sea. A proper independent flood risk assessment should be carried out by an independent authority to properly evaluate the current flooding situation and how this development along with other proposed windfarm developments in the area will further impact the flooding situation. An ACP should satisfy itself that all flood risk assessment in this application is carried out in accordance with national and EU directives and the livelihood, welfare and health & safety of local communities is not compromised in keeping with the Aarhus Convention which Ireland is a member.

7) **Habitats Directive:** The Planning Authority must satisfy itself that any proposed planning application is in compliance with **Council Directive 92/43/EEC of the 21 May, 1992** in respect of the conservation of natural habitats and of wild fauna and flora and ensure that the adjacent site which has been designated as an NHA and sites in the vicinity is not affected by any planning granted in compliance with Article 6.3 of the directive: 'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the sites conservation objectives. In light of the conclusions of the assessment of the implications for the site and subject to the provision of paragraph 4 the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public'. ACP must ensure all obligations under this directive are adhered to in the planning process.-

ACP must take on board that the government plans or programmes for renewable energy including the National Renewable Energy Action Plan 2010 under EU Directive 2009/28/EC and subsequent plans or programmes including Project Ireland 2040 and the National Energy and Climate plan 2021-2030 were all enacted during the period after 21st July, 2004 when the Strategic Environmental Assessment **Directive 2001/42/EC (SEA) was in force**. Articles 2 to 4 stipulate an assessment must be done with public participation, transboundary consultation ending in an Environmental Report. Article 3(2) specifically required such plans for energy be assessed. No such assessment was done and no Environmental Report exists. Any such development plan in County Mayo must include wind energy and must be assessed under the directive. It is not and no Environmental Report exists.

The construction of wind farms in Belgium was meant to be guided by local government circulators similar to the Irish Wind Energy Guidelines 2006. They were not assessed. The Court of Justice of the European Union has ruled in case **C-24/19** that a circular issued by an authority to guide wind farm development

1. is a plan or programme under the SEA Directive
2. The Belgium circular was not assessed and any planning consent given under them must be annulled and
3. Any existing wind farm already operating and built under these guidelines must have their permission annulled.

The Irish Wind Energy Guidelines 2006 are almost identical to the Belgium circular covering noise and shadow flicker and other effects. The Irish Guidelines are therefore unlawful and cannot be used to justify or guide the decision making process in this instant case by ACP.

The 2019 guidelines in Ireland are only a draft, they are made outside the SEA Directive and have no legal standing. The government representative answering an Access to Information Request has stated that any new guidelines will be processed within the SEA Directive.

The Board has its own legal section which has never been known to become involved in Judicial Reviews which it should. The Board should seek the views of its own legal section and include them in the report to grant or refuse this application. The mention of the 2006 or 2019 guide lines is invalid.

Here is the wording of Directive 2001/42/EC Article 3 in italics.

"Scope

1. An environmental assessment, in accordance with Articles 4 to 9, shall be carried out for plans and programmes referred to in paragraphs 2 to 4 which are likely to have significant environmental effects.

2. Subject to paragraph 3, an environmental assessment shall be carried out for all plans and programmes,

(a) which are prepared for agriculture, forestry, fisheries, **energy**, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use and which set the framework for future development consent of projects listed in Annexes I and II to Directive 85/337/EEC"

The EIAR accompanying this application is the modern equivalent of the earlier EIAR Directive. As the SEA Environmental Report sets the framework for projects under the EIA Directive and there is no such report, The EIAR accompanying this application is invalid.

Any national plan for wind energy in Ireland must set the framework at national level. The Board cannot assess such a plan or programme because it must be done under the Directive. The Board cannot assess the impact of noise, shadow flicker, peat slippage and other impacts on the environment of this proposed wind farm because that is the function of the SEA.

If the Irish government claims the 2006 Guidelines were compiled outside the period of the SEA in which the first proprietary act commenced before the 21st July 2004 then those guidelines expire on the 21st July 2004.

The 2006 Guidelines have been used for years during which they had no probative value. The decision of the ECJ - **Ruling C24/19 clearly stipulate any grant must be annulled.**

Evidence must be produced by the developer that the turbines are exactly described as per High Court ruling and a copy of the type certification under the machinery Directive must be included. Many existing turbines have no certification under the Directive. This information must be sought.

It should be borne in mind that if this wind farm is granted consent and built, a legal challenge can be taken under Section 160 of the Planning and Development Act 2000. It will be in the same position as the Derrybrien wind farm in Co. Galway. Anyone can apply to have it taken down which means it will not be sustainable under the Planning and Development Act. This application is premature, the SEA for the plan or programme and for new guidelines must be done first. It is incumbent on ACP to abide by the law. - References: Ruling C-24/19 can be found by searching cases Court of Justice of European Union online search form.

In addition under the directive ACP cannot rely on the EIAR prepared by agents of the developer as this is not independent and not prepared on behalf of the State and not prepared prior to the adoption of plans or programs.

-Mayo County Council (MCC) did not link in with the residents in the community prior to the designation of the area as open for speculation despite its location in close proximity to the Ceide fields and designated sites and where peat slippages are recorded on the GSI and other which are not recorded but occurred i.e November 22.

-MCC failed in their designation to take into account Directive 2001/42 Annex I (d) when it failed to take into account **'any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC'** – the area is known for peat slippages which is a major environmental problem and there are several NHA & SAC surrounding the site which is in close proximity to Altderg River and Keerglen river which adjoins Ballinglen river and runs all the way to Ballycastle beach (8KM) in total. An ACP must satisfy itself the aforementioned directives are adhered to in the planning process.

-ACP should take into account **Annex I (f) of the Directive 2001/42** in that **' the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors'** – The area is prone to peat slippage, concerns have also been raised by National Parks and Wildlife regarding drainage of the nearby NHA at Inagh bog. NPWS have also raised concerns regarding the bird surveys and the existence of the Golden Plover which I have also raised in my original submission.

- ACP should satisfy itself that **Directive 2001/42 Annex II** is taken into account with regard to the **' the characteristics of the effects and of the area likely to be affected, having regard, in particular to – the probability, duration, frequency and reversibility of the effects**

- The cumulative nature of the effects
- The transboundary nature of the effects
- The risks to human health or the environment (e.g due to accidents)
- The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)
- The value and vulnerability of the area likely to be affected due to :
 - Special natural characteristics or cultural heritage
 - Exceeded environmental quality standards or limit values
 - Intensive land- use

The effects on areas or landscapes which have a recognised national, Community or international protection status’.

8)Project splitting :

This Glenora windfarm application does not include connection to the grid. This will require a separate application which is project splitting .The connection to the grid is likely to follow the Ballinglen Road all the way to Asahi which is circa 25km .It is uncertain at the moment if this grid connection will be undertaken as part of the national grid by ESB networks or a private grid connection to Asahi. In the high court case O’GRianna v An Bord Pleannala (IEHC 632,12/12/2014) the decision to grant permission for a windfarm in Cork was quashed on the grounds of project splitting which is the case with Glenora. The court stated grid connection was an integral part of the development and could not be considered as a project. To comply with the court ruling ACP should insist on the application to construct the windfarm and grid connection be treated as one application to comply with the aforementioned case law. As the grid connection is not included with this application the application should therefore be rejected as incomplete.

Signed: Kevin Loftus

Date: 20/01/2026

Appendix:

Photo One:

Peat Slippage at Glenora 2022



Photo Two:

Flash Flooding On Keerglen River taken 2km only from Glenora. Photo shows over spillage despite high river banks. Further photos of flooding cutting off villages in Ballinglen valley have already been provide in first submission.

