

An Bord Pleanála
64 Marlborough St,
Rotunda
Dublin 1

Skeavally Wind Turbine Action Group
c/o Orla Glennon
Skeavally
Taughmaconnell
Ballinasloe
Co. Roscommon

Dear An Bord Pleanala,

AN BORD PLEANALA	
LDG-	077275-25
ABP-	
14 JAN 2025	
Fee: €	50.00
Type:	M/O
Time:	
By:	POST

Re: Observation on Case Reference VA20.321238

On behalf of the Skeavally wind turbine action group, please find attached an observation on case reference VA20. 321238.

The 50 euro fee is attached.

Yours Faithfully,


Orla Glennon

C/o Skeavally Wind Turbine Action group

Skeavally Wind Turbine Action Group

Observation on Bord Pleanála Case reference: VA20.321238

Located at Moyvannan, Feamore, Lisbaun, Carrownolan, Carrowncloghan, Carrowkeeney, Ardmullan, Curraghboy, Gortnasythe, Derryglad, Eskerbaun & Brideswell, Co. Roscommon

A 110 kilovolt (kV) 'loop-in/loop-out' Air-Insulated Switchgear (AIS) electricity substation, including a single-storey control building (with a Gross Floor Area of 450 square metres) and all associated electrical equipment and services within a 2.6 metre high fenced compound (with a total footprint of approximately 8,500 square metres);

ii. Replacement of 1 no. existing wooden pole-set with 2 no. lattice-type interface masts, each of which will be between 15 and 18 metres in height, to facilitate connection of the 110kV underground electricity lines to the existing Athlone Lanesborough 110kV overhead electricity transmission line;

iii. Approximately 270 metres of 110kV underground electricity line between the electricity substation and the interface masts;

iv. Approximately 630 metres of access tracks with associated upgrade works to an existing agricultural entrance from the L7551 local road;

v. Approximately 7.5 kilometres of 110kV underground electricity line between the electricity substation and the junction of the L7636 local road and R363 regional road where the electricity line will connect to electricity cables permitted as part of the Seven Hills Wind Farm (An Bord Pleanála Reference ABP-313750-22). The electricity line will be placed within private lands and within the carriageway of the L7551, L7556, L2018, L7731, R362, L2023, and L7636; and, Moyvannan Electricity Substation Planning Statement 3

vi. All associated and ancillary site development, excavation, construction, landscaping and reinstatement works and the provision of site drainage infrastructure and surface water protection measures.

On behalf of Skeavally Wind Turbine Action Group we submit our observations to the above development on the following points:

Cumulative Impact Assessment:

Planning permission was granted by An Bord Pleanála in November 2023 for the development of a 17 no. turbine wind energy development and associated infrastructure planning reference ABP: 313750. Energia have now submitted this new application for a new grid connection in the above named townlands.

The EIAR assesses the likelihood of the project acting in combination with other existing, permitted and proposed developments in the wider vicinity of the project to result in effects on the environment which, when combined, may result in effects which are cumulatively significant.

Karst Landscape and Biodiversity

1. The Geological Heritage of Roscommon Audit report (Parkes et al, 2012), states that the Killeglan Karst Landscape which includes the townland of Skeavally is of national importance as it is the only such area of lowland, boulder-strewn, limestone glacial karst in the country. The report also states that in order to delineate the exact remaining areas of interest a detailed field survey is required. Further research and investigation is required to document and understand the full scientific story. It would be highly prudent that this is carried out before any such development has the potential to erode a highly sensitive landscape. There is no evidence that such an investigation has been carried out by the applicant or Roscommon county council. No windfarm has ever been successfully built on a karst landscape to date. This Karst region of Skyvalley is a very unique and fragile environment.
2. On a recent field visit to this area from the National Parks and Wildlife Service (30th November 2021) and the subsequent report that was received from the visit, it states that "this area of Skyvalley is an area of national importance because of the extent of valuable and species rich semi-natural habitats found. These habitats are rare, notwithstanding that some areas have been "reclaimed" for agriculture, the remaining areas still constitute a valuable national resource. On the visit a new moss to Co. Roscommon called *Rhodobryum roseum* was recorded and a detailed survey is now required of the botany, fungi and fauna in the area to establish if further uncommon species are in this area". There are large areas of the rough/rocky grassland, which are likely to conform to the EU Habitats directive Annex listed species- rich calcareous grassland, and as such, this is a rare and special habitat and is in decline across Ireland. Condition no. 4 of the Board's grant of permission ABP Ref: 313750 is completely inadequate in offering the level of protection that this area of national importance requires.
3. On a subsequent visit by the National Parks and Wildlife Service, the Conservation Ranger for South Roscommon Laura Connelly gave the following observations: "I was lucky to visit this magical Karst landscape at different times throughout the year. I recently visited in July '22 with two colleagues, Miriam

Crowley and Chris Peppiatt. The place was alive with colour and sound! We were greeted by a hunting Kestrel, and could hear ravens, blackcaps and chaff chaffs throughout the walk. Common frogs were seen near the beautiful wooded dolines and an array of butterflies were enjoying the vast species of rich grasslands. We came across 6 flowering orchids, including the rare frog's orchid. We recorded approx. 92 different species of plants and trees on-site and this number would be much higher in an extensive survey. The landscape is like a time capsule a glimpse of what was once widespread in South Roscommon. This is directly linked to the sensitive management and traditional farming practices by the Kildea family over many generations, and is worth protecting for the generations that come behind us".

It is also important to state that the impact of dust and noise to this sensitive location has not been afforded adequate protection in the conditions of grant of permission in ABP Ref:313750.



Closest Turbine No. 13 to this unique area.

4. Under the EU Habitats Directive the Marsh Fritillary (*Euphydryas aurinia*) is a legally protected insect. Under the Red list of Irish Butterflies the Marsh Fritillary is categorised as Vulnerable meaning it is at high risk of extinction. I would like to

refer to the Ireland's Butterfly Series online edition ISSN: 2737/7423 that shows the picture of the habitat "Structured Sward" in Killeglan Co. Roscommon. It is imperative that no development or industrialisation interferes with this habitat as the quality of the habitat must be maintained in order for the Marsh Fritillary to recolonise and further field studies are now urgently required by all relevant competent specialists.

5. According to the Natura 2000, Reference Killeglan Grassland SAC, this area is one of the most important sites for the legally protected species of Orchid Morio and the *lepus timidus hibernicus* and the *Meles Meles*, this protected site is only a short distance away from the proposed wind farm site and there is a potential for the erosion of biodiversity through the loss of habitat due to this development in this location.

Skeavally Turlough/Feacle South

6. According to Skeffington et al, Turloughs are wetlands which are perhaps the most threatened and fragile habitats in Europe. Turloughs are karst features and their flooding is the surface manifestation of ground water that is linked characteristically via swallow holes and to sub-terrain karst geomorphical features. Each Turlough has its own unique hydrological features that in turn has a bearing on substrate vegetation types or invertebrate communities, and as stated by Skeffington et al, (2006) knowledge on Turloughs and their biodiversity is far from complete.

A clear omission in the EIAR was that of the Skeavally Turlough or as it was named in the EIAR as "Feacle South". This turlough roughly 300m due south of Feacle lough covers an area of approx. 35-40 acres it is connected by underground rivers to Feacle Lough on the North and the Killeglan springs to the south. This turlough is right in the middle of the proposed windfarm and Killeglan water supply protection zone. As there are no rivers and drains in this area the water from the proposed windfarm will all congregate and travel underground to the nearest Turlough. Figure 9.5 and Figure 9.6 in Chapter 9 clearly shows Skeavally Turlough or as the EIAR names it as "Feacle South". A large Turlough covering 40 acres in the middle of the southern cluster required further investigation.

It is acknowledged that Feacle Turlough was given a site specific study, however Four Roads and Corkip Turlough were also excluded for site specific studies so a full and comprehensive EIAR of all the turloughs was not completed.

The Skeavally Turlough will flood homes and farmyards and roads if there is a rise in the water level to the underground water table in the area, climate change has brought increased

Any chemicals from concrete drying/oil spillages etc have huge potential to cause contamination for our drinking water for the community and for the animals as well as having a devastating effect on the biodiversity of this Turlough itself in regards to the plants and animals that live and breed on it.

The tracer tests have shown Karst connections and transmissive ground water conduits within the low levels. This proves that more investigations are required.

There was no study carried out to record the distribution of water birds at this Turlough. As per wind energy guidelines consideration must be given to all waters for wind farms.

The proposed southern cluster turbines are located on the northern side of the topographic data the proposed turbines will not drain in the direction of the Killeglan River but some turbines are in the catchment of Feacle Turlough which connect to this Killeglan springs and therefore water contamination from construction T17, T18, T19, T20 could have the potential to affect the drinking water and due to the fact there is a tracer link to Skeavally Turlough it furthermore shows that the EIAR is flawed in regards to the assessment of Turloughs in this area with no access to two turloughs and the Skeavally turlough excluded.

A tracer test carried out by GSI in 2013 confirmed the connection with Lough Feacle to the Tobermore spring. The location of the confirmed connection is within 1.0km of the southern cluster of turbines.

The Applicant has failed to address the following:

Why was Skeavally Turlough "Feacle south" excluded from the report?

Where was the scientific justification for its exclusion?

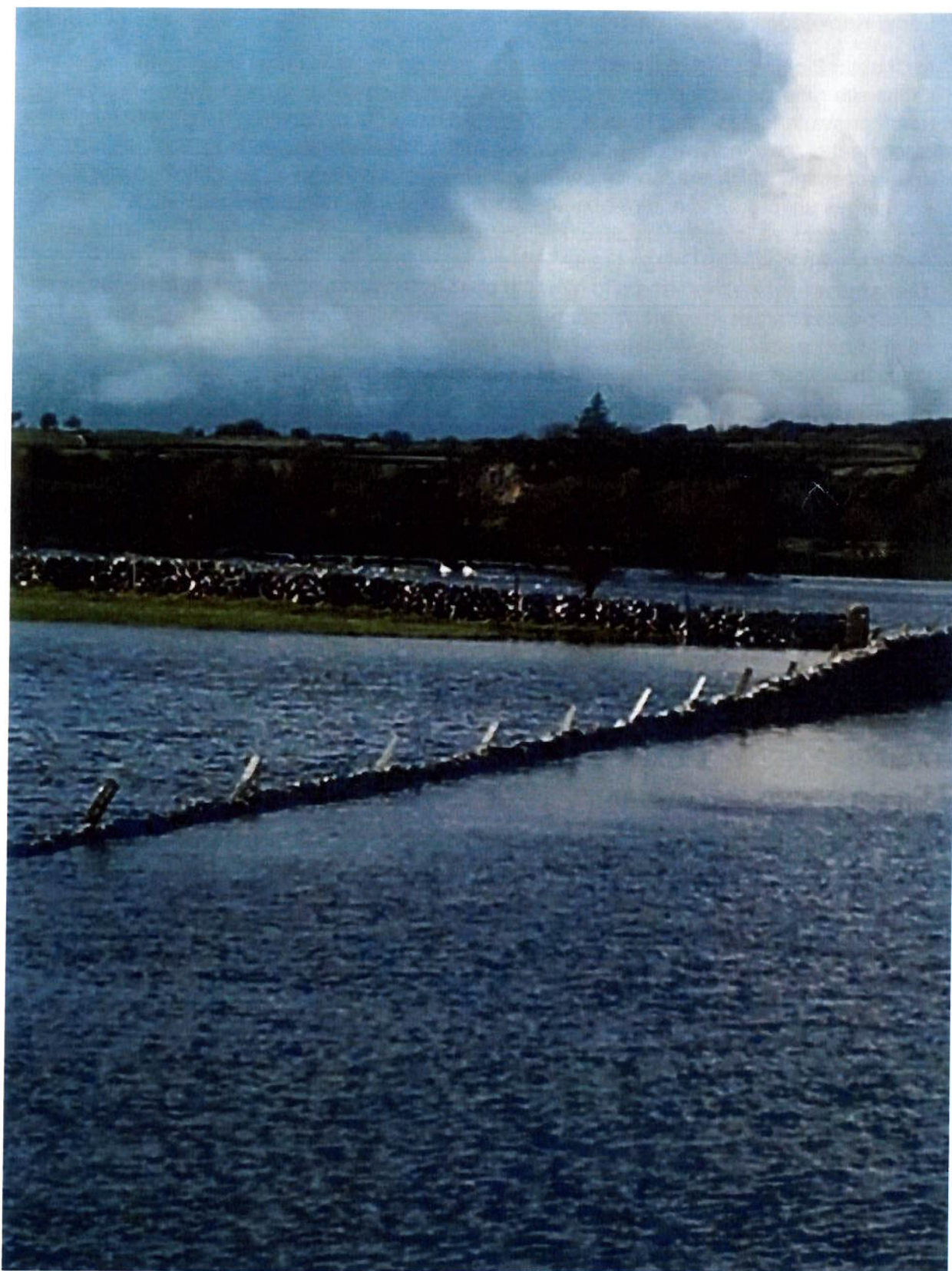
Why was this Turlough not a Key Turlough for the EIAR?

The applicant failed to highlight this in the limitations and difficulties encountered as to its exclusion.

There is a clear and undisputed link from Feacle Turlough to the Skeavally Turlough known as "Feacle south" in the EIAR. The groundwater flow towards Feacle Turlough cannot be discounted as stated in the EIAR. The justification of the impact being minor due to control measure put in place is a weak argument as this is the drinking water for over 5,500 people and the farm animals and wildlife that it also serves. If any contamination were to occur this could have a devastating impact on all.

As each Turlough has its own unique hydrological features, it is clear that this should have been considered in the EIAR and fundamentally the data set collected and conclusions are flawed without its very inclusion.

Note: The karstic systems of which turloughs form a part have a number of characteristics that render their hydrology very sensitive to anthropogenic pressures. Their sensitivity is such that a relatively slight stress at some point in the hydrology of the karst system may cause a disproportionately large response (Drew, D. and Hotzl H., 1999). The interdependence of hydrology and ecology guarantees that any changes to the hydrology will impact on the ecology. (Tynan, Gill and Johnston, 2007).



Skeavally Turlough/ Feacle South

Local Knowledge of Groundwater Flow:

In Chapter 9 of the EIAR, it states, "there is no surface water features draining this windfarm so the site runoff is 0mm per year, however in the next sentence its stated there is localised runoff or overland flow. This does indeed happen due-east of Feacle turlough which is in the catchment of the windfarm development. When the Turlough reaches a certain height, it drains overland which is a regular occurrence, it travels overland for roughly 2km and then submerges underground and re-appears in the adjacent field and continues on its pathway until it reaches an intermediate seasonal man made stream located east of Tobermore spring known locally as Onagh drain. Ground water from the Tobermore spring and discharge area joins this stream to form the head of the Killeglan River. Therefore, any pollution /discharges from the windfarm development will affect water quality in the area. We do not want a similar situation like what has happened and is documented in Scotland where many local water supplies were polluted by windfarm developments.

On November 29th 2024 we had a night of heavy rain in South Roscommon. Ten days later on December 2024 Feacle lough started to flow water above ground and within 5 days eight acres were covered with a few feet of water. This shows the vast array of caves and rivers running underground from the surrounding hills where the windfarm is proposed into the lough. Any damage done by construction of a windfarm by blasting etc would cause cave collapse and have a profound and devastating affect on the turlough and on the wider community. The proposed windfarm is just 500m North of Feacle Lough. Do not be responsible for destroying a turlough and causing homes and farms to be flooded. This turlough has worked for centuries and its greatest enemy is human interference.

The Tobermore Spring is the main source of water treated at the Killeglan Water Treatment plant.

A report published by Bresnihan et al, (2021), states that there are limits to what can be known about a groundwater system however because the path of the water is changed by seasonal fluctuations in rainfall and alterations in the karst structure the models built up by geologists are incomplete and uncertain. It is only through the steady mapping of karst features and iterative testing and observations of underground pathways that confidence in the accuracy of the models can be increased. This can take up to 30 years of investigation.

The applicant has not provided any scientific evidence to show the complicated flow of groundwater in and around the wind farm.

Roscommon receives an annual average rainfall of 1012m which means the water table is usually close to the surface. As it's widely known and accepted that water moves more quickly and in an unpredictable way beneath the surface and into the underlying karst system.

https://www.epa.ie/publications/research/water/Research_Report_364.pdf

Conclusion:

It was our understanding from the outset that Energia had permission granted for connection to the grid in Monksland. What was the understanding from An Bord Pleanála when they granted this under ABP: 313750.

ALBORD PLEANALA

LDG- _____
ABP- _____

14 JAN 2025

Fee: € 50 type: pmo
Time: 9.10 By: Post