

RECEIVED: 29/08/2024

## Appendix 2.2

### Consultee Responses

### Keerglen Wind Farm

Department of Agriculture, Food and the Marine

**From:** Environmental Co-ordination (Inbox) <Environmental\_Co-ordination@agriculture.gov.ie>

**Sent:** Tuesday, March 8, 2022 9:54 AM

**To:** David Clarke <David.Clarke@abo-wind.com>

**Subject:** RE: Consultation - Keerglen Wind Farm

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Hello

The following are the comments from the Department of Agriculture, Food & the Marine in relation to the proposed development:

If the proposed development will involve the felling or removal of any trees, the developer must obtain a Felling License from this Department before trees are felled or removed. A Felling Licence application form can be obtained from **Felling Section, Department of Agriculture, Food and the Marine, Johnstown Castle Estate, Co. Wexford**. Email: [felling.forests@agriculture.gov.ie](mailto:felling.forests@agriculture.gov.ie) or Web gov.ie - Tree Felling Licences ([www.gov.ie](http://www.gov.ie))

A Felling Licence granted by the Minister for Agriculture, Food and the Marine provides authority under the Forestry Act 2014 to fell or otherwise remove a tree or trees and/or to thin a forest for silvicultural reasons. The Act prescribes the functions of the Minister and details the requirements, rights and obligations in relation to felling licences. The principal set of regulations giving further effect to the Forestry Act 2014 are the Forestry Regulations 2017 (S.I. No. 191 of 2017).

The developer should take note of the contents of **Felling and Reforestation Policy** document which provide a consolidated source of information on the legal and regulatory framework relating to tree felling; gov.ie - Tree Felling Licences ([www.gov.ie](http://www.gov.ie)) As this development is within forest lands, particular attention should be paid to deforestation, turbulence felling and the requirement to afforest alternative lands.

In order to ensure regulated forestry operations in Ireland accord with the principles of sustainable forest management (SFM), as well fulfilling the requirements of other relevant environmental protection laws, the Department (acting through its Forest Service division) must undertake particular consultations, and give certain matters full consideration during the assessment of individual Felling Licence applications. This includes consultation with relevant bodies, the application of various protocols and procedures (e.g. Forest Service Appropriate Assessment Procedure), and the requirement for applicants on occasion to provide further information (e.g. a Natura Impact Statement).

Consequently, when the Forest Service is considering an application to fell trees, the following applies:

1. The interaction of these proposed works with the environment locally and more widely, in addition to potential direct and indirect impacts on designated sites and water, is assessed. Consultation with relevant environmental and planning authorities may be required where specific sensitivities arise (e.g. local authorities, National Parks & Wildlife Service, Inland Fisheries Ireland, and the National Monuments Service);
2. Where a tree Felling Licence application is received, the Department will publish a notice of the application before making a decision on the matter. The notice shall state that any person may make a submission to the Department within 30 days from the date of the notice. The notices are published online at: gov.ie - Felling Licence Applications ([www.gov.ie](http://www.gov.ie))
3. Third parties that make a submission or observation will be informed of the decision to grant or refuse the licence, and on request, details of the conditions attached to the licence, the main reasons and considerations on which the decision to grant or refuse the licence was based, and where conditions are attached to any

## Appendix 2.2

### Keerglen Wind Farm Environmental Impact Assessment Report

licence, the reasons for the conditions. Both third parties and applicants will be also informed of their right to appeal any decision within 14 days to the Forestry Appeals Committee. Felling Licence decision are published online at: gov.ie - Felling Licence Decisions ([www.gov.ie](http://www.gov.ie))

It is important to note that when applying to a **Local Authority**, or **An Bord Pleanála**, for planning permission where developments are:

- a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or
  - b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and
  - c) the proposed development in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species,
1. that there is a requirement inter alia under the EIA Directive for an overall assessment of the effects of the project or the alteration thereof on the environment to be undertaken, including the direct and indirect environmental impact of the project; and
  2. pursuant to Article 2(3) of the EIA Directive, the Department of Agriculture, Food and the Marine strongly recommends that, notwithstanding the fact that a parallel consent in the form of felling licence may also have to be applied for, any EIAR and/or NIS produced in connection with the application for planning permission to the Local Planning Authority or An Bord Pleanála, should include an assessment of the impact of and measures, as appropriate, to prevent, mitigate or compensate for any significant adverse effects direct or indirect identified on the environment arising from such felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species.

Kind regards

**Cathy Hewitt**

*Executive Officer*

**An tAonad um Chomhordú Timpeallachta, An Rannóg um Athrú Aeráide agus Beartas Bithfhuinnimh,**  
*Environmental Co-ordination Unit | Climate Change & Bioenergy Policy Division |*

**An Roinn Talmhaíochta, Bia agus Mara**

*Department of Agriculture, Food and the Marine*

**Pailliún A, Páirc Gnó Grattan, Bóthar Átha Cliath, Port Laoise, Co Laoise, R32 K857**

Pavilion A, Grattan Business Park, Dublin Road, Portlaoise, Co Laois, R32 K857

T +353 (0)57 868 9915 [environmentalco-ordination@agriculture.gov.ie](mailto:environmentalco-ordination@agriculture.gov.ie)

[www.agriculture.gov.ie](http://www.agriculture.gov.ie)

**From:** David Clarke <David.Clarke@abo-wind.com>

**Sent:** Tuesday 8 February 2022 13:26

**Subject:** Consultation - Keerglen Wind Farm

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Dear Consultee,

ABO Wind Ireland Ltd. (ABO Wind) are seeking to develop a Wind Farm within the townlands of Keerglen, Co. Mayo.

## Appendix 2.2

### Keerglen Wind Farm Environmental Impact Assessment Report

Accordingly, we have commenced the Environmental Impact Assessment (EIA) process to support a forthcoming planning application that will be submitted to Mayo County Council. The proposed wind farm site is located circa 5.5 km to the south of Ballycastle and 15 km north of the village of Crossmolina, County Mayo.

Further details of the proposed project can be found in the attached Scoping Report. A Site Location Plan, Site Layout Plan and Grid Connection Route Drawing are also attached for your information.

We are consulting with you on this proposal as it may be of interest to you (or your organisation). While you will be presented with the opportunity to make a submission on the proposed development as part of the statutory planning process, we wanted to engage with you early in the process to make you aware of the emerging proposals and to provide you the opportunity to comment as necessary. If there are any key issues which you consider should be addressed during the preparation of the Environmental Impact Assessment Report (EIAR) we would welcome your input at this stage.

Should this consultation request be directed to another contact within your organisation we would be grateful if you could forward this information on to them, or respond to this email and provide us with the appropriate contact.

If you have any queries, or require any additional information, please do not hesitate to get in touch.

Kind regards,

David  
David Clarke  
Junior Project Manager

Unit 3, Aspen Court  
Cornelscourt  
Dublin  
D18 K400  
[David.Clarke@abo-wind.com](mailto:David.Clarke@abo-wind.com)  
Phone: +353 (0)1 289 08 45  
Mobile: +353 (0)86 2363564

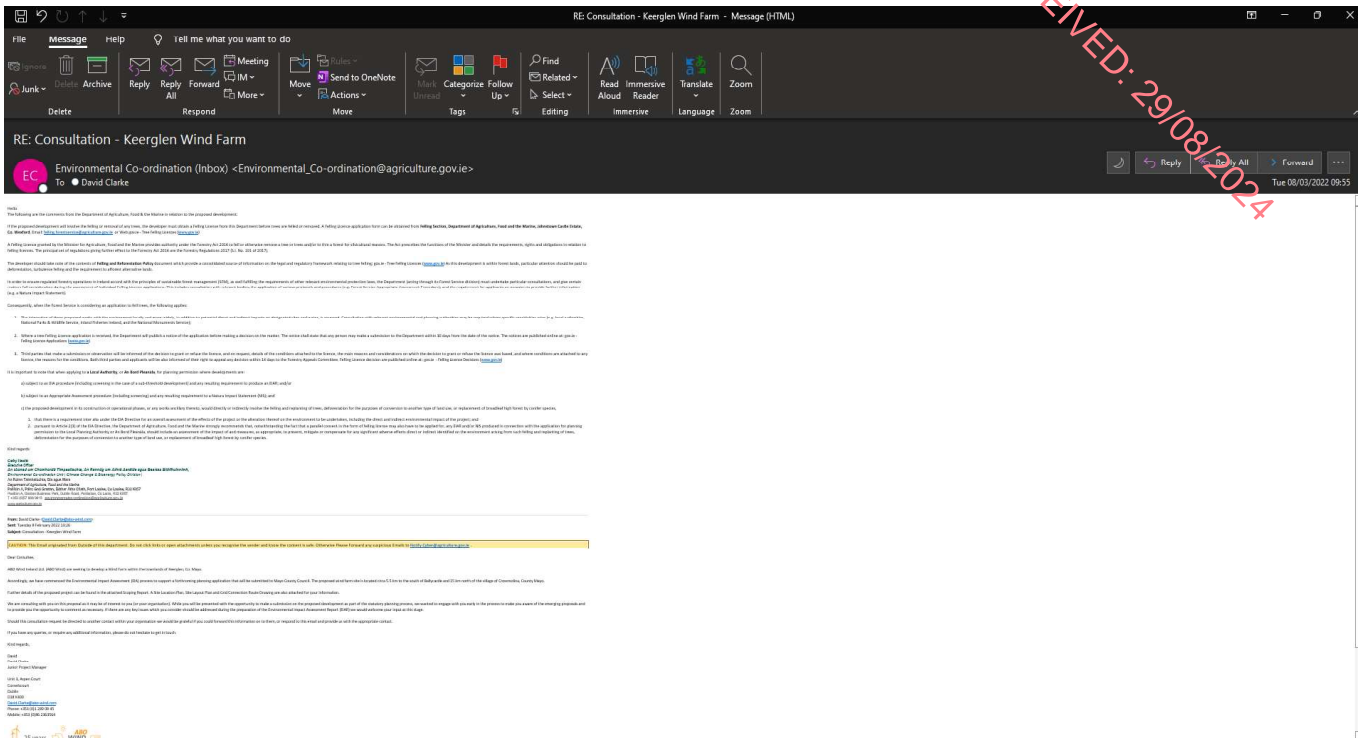


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## Appendix 2.2 Keerglen Wind Farm Environmental Impact Assessment Report

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## Fáilte Ireland

Hello David,

Thank you for your email regarding the Environmental Impact Assessment (EIA) for the proposed wind farm site located circa 5.5 km to the south of Ballycastle and 15 km north of the village of Crossmolina, County Mayo.

Please see attached a copy of Fáilte Ireland's Guidelines for the Treatment of Tourism in an EIA, which you may find informative for the preparation of the Environmental Impact Assessment for the proposed project. The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

Regards,

Yvonne

**Yvonne Jackson**

**Product Development-Environment & Planning Support | Fáilte Ireland**

88-95 Amiens Street, Dublin 1, D01 WR86

Currently working Remotely | **M** +353 (0)86 0357590



## Appendix 2.2

### Keerglen Wind Farm Environmental Impact Assessment Report

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**From:** David Clarke <[David.Clarke@abo-wind.com](mailto:David.Clarke@abo-wind.com)>

**Sent:** Tuesday 8 February 2022 13:26

**Subject:** Consultation - Keerglen Wind Farm

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Dear Consultee,

ABO Wind Ireland Ltd. (ABO Wind) are seeking to develop a Wind Farm within the townlands of Keerglen, Co. Mayo.

Accordingly, we have commenced the Environmental Impact Assessment (EIA) process to support a forthcoming planning application that will be submitted to Mayo County Council. The proposed wind farm site is located circa 5.5 km to the south of Ballycastle and 15 km north of the village of Crossmolina, County Mayo.

Further details of the proposed project can be found in the attached Scoping Report. A Site Location Plan, Site Layout Plan and Grid Connection Route Drawing are also attached for your information.

We are consulting with you on this proposal as it may be of interest to you (or your organisation). While you will be presented with the opportunity to make a submission on the proposed development as part of the statutory planning process, we wanted to engage with you early in the process to make you aware of the emerging proposals and to provide you the opportunity to comment as necessary. If there are any key issues which you consider should be addressed during the preparation of the Environmental Impact Assessment Report (EIAR) we would welcome your input at this stage.

Should this consultation request be directed to another contact within your organisation we would be grateful if you could forward this information on to them, or respond to this email and provide us with the appropriate contact.

If you have any queries, or require any additional information, please do not hesitate to get in touch.

Kind regards,

David

David Clarke  
Junior Project Manager

Unit 3, Aspen Court  
Cornelscourt  
Dublin  
D18 K400

[David.Clarke@abo-wind.com](mailto:David.Clarke@abo-wind.com)

Phone: +353 (0)1 289 08 45

Mobile: +353 (0)86 2363564

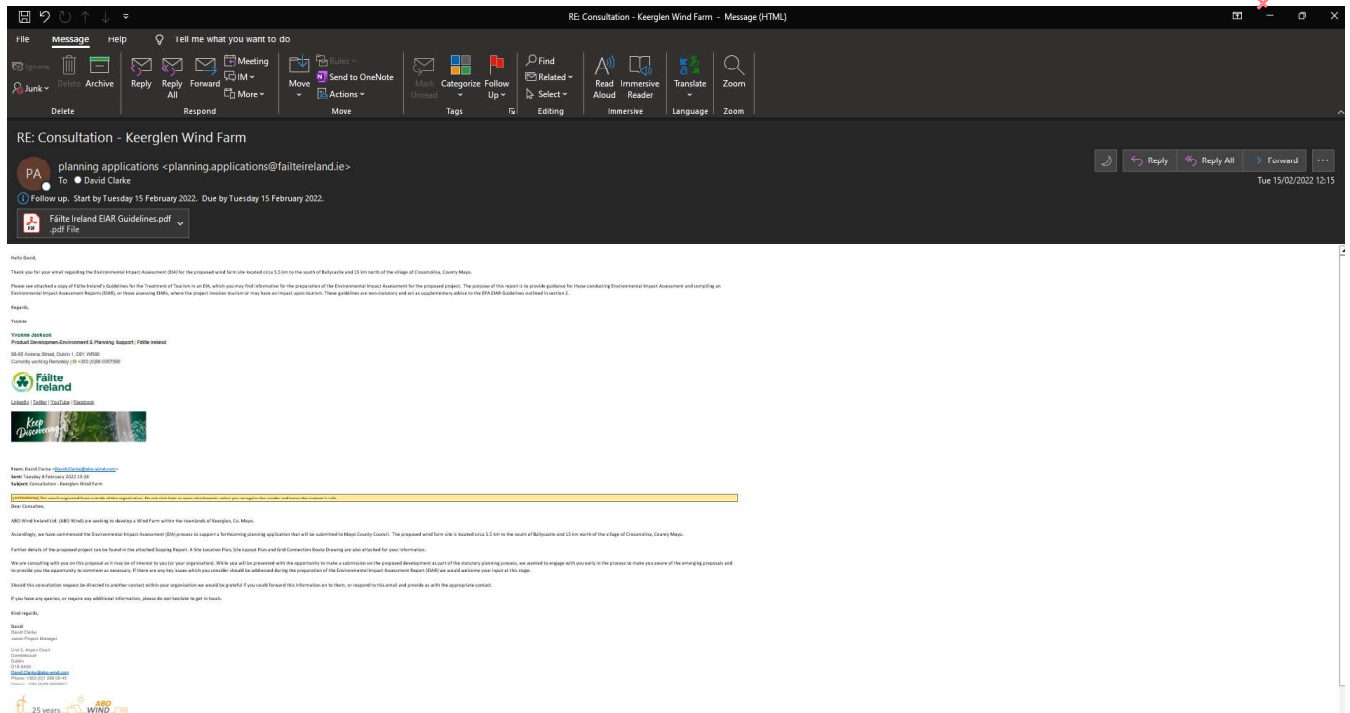
## Appendix 2.2 Keerglen Wind Farm Environmental Impact Assessment Report



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## Irish Water

Good morning David,

I hope you are well today.

Please find attached Irish Waters response to your EIA scoping request relating to your forthcoming planning application for a wind farm development located circa 5.5 km to the south of Ballycastle and 15 km north of the village of Crossmolina, County Mayo.

If you need anything else, please let me know.

Kind regards,

**Cillian Claffey** B.A, MPlan  
Development Management Planning

**Uisce Éireann**  
Teach Colvill, 24-26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86, Éire  
**Irish Water**



Appendix 2.2

Keerglen Wind Farm Environmental Impact Assessment Report

Colvill House, 24-26 Talbot Street, Dublin 1, D01 NP86, Ireland

T + 01 89 25187

M +353 89 260 3904

[cillian.claffey@water.ie](mailto:cillian.claffey@water.ie)

[www.water.ie](http://www.water.ie)

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**From:** David Clarke <[David.Clarke@abo-wind.com](mailto:David.Clarke@abo-wind.com)>

**Sent:** Tuesday 8 February 2022 13:26

**Subject:** Consultation - Keerglen Wind Farm

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ABO Wind Ireland Ltd. (ABO Wind) are seeking to develop a Wind Farm within the townlands of Keerglen, Co. Mayo.

Accordingly, we have commenced the Environmental Impact Assessment (EIA) process to support a forthcoming planning application that will be submitted to Mayo County Council. The proposed wind farm site is located circa 5.5 km to the south of Ballycastle and 15 km north of the village of Crossmolina, County Mayo.

Further details of the proposed project can be found in the attached Scoping Report. A Site Location Plan, Site Layout Plan and Grid Connection Route Drawing are also attached for your information.

We are consulting with you on this proposal as it may be of interest to you (or your organisation). While you will be presented with the opportunity to make a submission on the proposed development as part of the statutory planning process, we wanted to engage with you early in the process to make you aware of the emerging proposals and to provide you the opportunity to comment as necessary. If there are any key issues which you consider should be addressed during the preparation of the Environmental Impact Assessment Report (EIAR) we would welcome your input at this stage.

Should this consultation request be directed to another contact within your organisation we would be grateful if you could forward this information on to them, or respond to this email and provide us with the appropriate contact.

If you have any queries, or require any additional information, please do not hesitate to get in touch.

Kind regards,

David

David Clarke

Junior Project Manager

Unit 3, Aspen Court

Cornelscourt

Dublin

D18 K400

[David.Clarke@abo-wind.com](mailto:David.Clarke@abo-wind.com)

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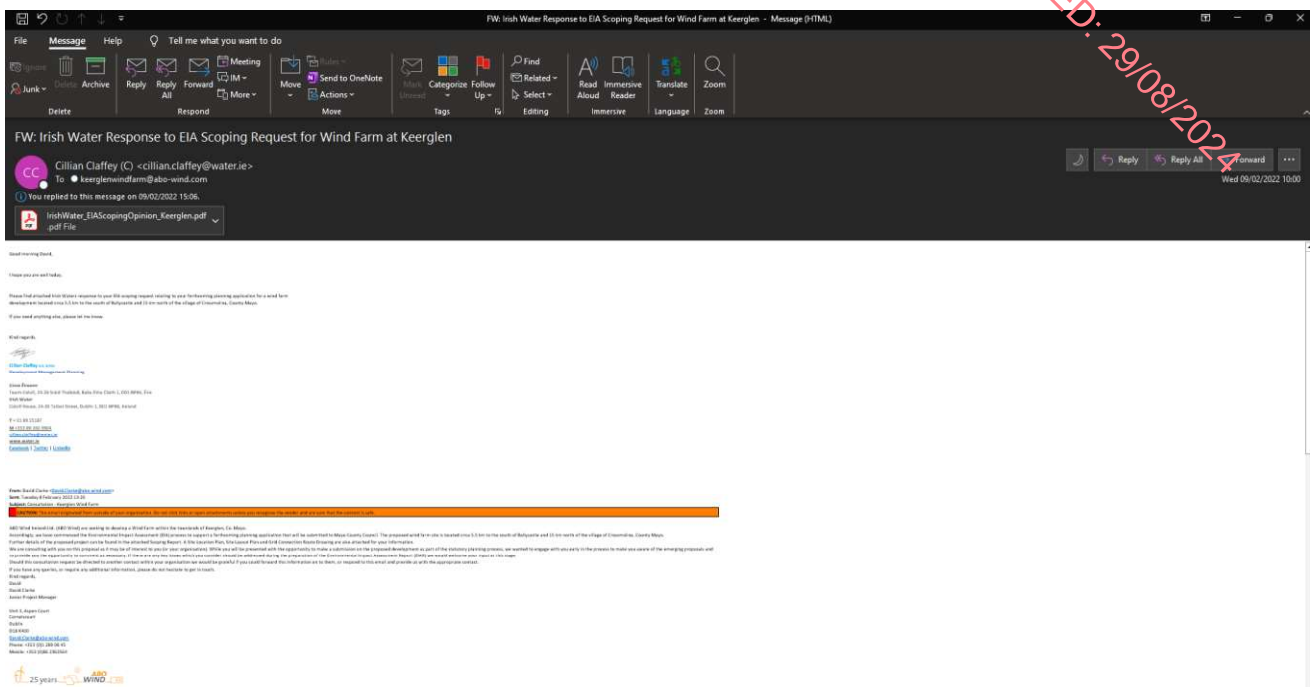
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### Keerglen Wind Farm Environmental Impact Assessment Report

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Unit 3, Aspen Court  
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D18 K400

9<sup>th</sup> February 2022

Uisce Éireann  
Bosca OP 6000  
Baile Átha Cliath 1  
D01 WA07  
Éire

Irish Water  
P.O. Box 6000  
Dublin 1  
D01 WA07  
Ireland

T: +353 01 89 25000  
T: +353 01 89 25001  
[www.water.ie](http://www.water.ie)

**Re: EIA Scoping Request** – Proposed wind farm development within the townlands of Keerglen, Co. Mayo.

Dear Mr Clarke,

Irish Water has received notification of your Environmental Impact Assessment (EIA) scoping request relating to your forthcoming planning application for a “wind farm site” located circa 5.5 km to the south of Ballycastle and 15 km north of the village of Crossmolina, County Mayo.

Please see attached, Irish Water’s scoping opinion in relation to Water Services. On receipt of the planning referral, Irish Water will review the finalised Environmental Impact Assessment Report (EIAR) as part of the planning process.

Queries relating to the terms and the EIA scoping opinions below should be directed to [planning@water.ie](mailto:planning@water.ie)

Yours sincerely,

Signed on behalf of Irish Water:

PP: Ali Robinson

**Yvonne Harris**  
Connections and Development Services

### Irish Water's Response to EIA Scoping Requests

At present, Irish Water does not have the capacity to advise on the scoping of individual projects. However, in general the following aspects of Water Services should be considered in the scope of an EIA where relevant;

- a) Where the development proposal has the potential to impact an Irish Water Drinking Water Source(s), the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to Irish Waters Drinking Water Source(s) during the construction and operational phases of the development. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified as part of the report.
- b) Where the development proposes the backfilling of materials, the applicant is required to include a waste sampling strategy to ensure the material is inert.
- c) Mitigations should be proposed for any potential negative impacts on any water source(s) which may be in proximity and included in the environmental management plan and incident response.
- d) Any and all potential impacts on the nearby reservoir as public water supply water source(s) are assessed, including any impact on hydrogeology and any groundwater/ surface water interactions.
- e) Impacts of the development on the capacity of water services (*i.e. do existing water services have the capacity to cater for the new development*). This is confirmed by Irish Water in the form of a Confirmation of Feasibility (COF). If a development requires a connection to either a public water supply or sewage collection system, the developer is advised to submit a Pre-Connection Enquiry (PCE) enquiry to Irish Water to determine the feasibility of connection to the Irish Water network. All pre-connection enquiry forms are available from <https://www.water.ie/connections/connection-steps/>.
- f) The applicant shall identify any upgrading of water services infrastructure that would be required to accommodate the proposed development.
- g) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an Irish Water collection network.
- h) In relation to the management of surface water, the potential impact of surface water discharges to combined sewer networks and potential measures to minimise and or / stop surface waters from combined sewers.
- i) Any physical impact on Irish Water assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets.
- j) When considering a development proposal, the applicant is advised to determine the location of public water services assets, possible connection points from the applicant's site / lands to the public network and any drinking

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water abstraction catchments to ensure these are included and fully assessed in any pre-planning proposals. Details, where known, can be obtained by emailing an Ordnance Survey map identifying the proposed location of the applicant's intended development to [datarequests@water.ie](mailto:datarequests@water.ie).

- k) Other indicators or methodologies for identifying infrastructure located within the applicant's lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.
- l) Any potential impacts on the assimilative capacity of receiving waters in relation to Irish Water discharge outfalls including changes in dispersion / circulation characterises. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified within the report.
- m) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (*and resultant potential impact on the capacity of the source*) or the potential of the development to influence / present a risk to the quality of the water abstracted by Irish Water for public supply should be identified within the report.
- n) Where a development proposes to connect to an Irish Water network and that network either abstracts water from or discharges wastewater to a "protected"/ sensitive area, consideration as to whether the integrity of the site / conservation objectives of the site would be compromised should be identified within the report.
- o) Mitigation measures in relation to any of the above ensuring a zero risk to any Irish Water drinking water sources (*Surface and Ground water*).

*This is not an exhaustive list.*

**Please note;**

- Where connection(s) to the public network is required as part of the development proposal, applicants are advised to complete the Pre-Connection Enquiry process and have received a Confirmation of Feasibility letter from Irish Water ahead of any planning application.
- Irish Water will not accept new surface water discharges to combined sewer networks.

RECEIVED: 29/08/2024

RECEIVED: 30/01/2024

Dear David,

With reference to your email received on the 08 February 2022, concerning the Scoping Report for Keerglen Wind Farm, Co Mayo, please find attached response and dataset sheet from Geological Survey Ireland.

If you have any further queries or if we can be of further assistance, please do not hesitate to contact me Trish Smullen, or my colleague Clare Glanville at [GSIPlanning@gsi.ie](mailto:GSIPlanning@gsi.ie).

Yours sincerely,

Trish Smullen  
Geological Survey Ireland

**From:** GSI Planning  
**Sent:** 08 February 2022 16:58  
**To:** Clare Glanville; Sophie O'Connor; Brian McConnell; Monica Lee; Taly Hunter Williams; Sean Cullen; Charise McKeon; Jim Hodgson; Eoin McGrath; Trish Smullen  
**Cc:** GSI Planning  
**Subject:** EIS 22/33 - Scoping Report for Keerglen Wind Farm, Co Mayo

[EIS 22/33](#)

[Scoping Report for Keerglen Wind Farm, Co Mayo. Request for observations by ABO Wind Ireland Ltd. Documents are enclosed.](#)

Regards,

John

**From:** David Clarke [<mailto:David.Clarke@abo-wind.com>]  
**Sent:** 08 February 2022 13:26  
**Subject:** Consultation - Keerglen Wind Farm

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Dear Consultee,

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Accordingly, we have commenced the Environmental Impact Assessment (EIA) process to support a forthcoming planning application that will be submitted to Mayo County Council. The proposed wind farm site is located circa 5.5 km to the south of Ballycastle and 15 km north of the village of Crossmolina, County Mayo.

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### Keerglen Wind Farm Environmental Impact Assessment Report

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If you have any queries, or require any additional information, please do not hesitate to get in touch.

Kind regards,

David

David Clarke  
Junior Project Manager

Unit 3, Aspen Court  
Cornelscourt  
Dublin  
D18 K400  
[David.Clarke@abo-wind.com](mailto:David.Clarke@abo-wind.com)  
Phone: +353 (0)1 289 08 45  
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RE: EIS 22/34 - Scoping Report for Keerglen Wind Farm, Co Mayo - Message (HTML)

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Delete Respond Actions Move Tags Up Editing Immersive Language Zoom

RE: EIS 22/34 - Scoping Report for Keerglen Wind Farm, Co Mayo

GSI Planning <GSIPlanning@GSI.ie>

To: David Clarke

Cc: Clare Glanville; GSI Planning

22\_34 Scoping Report for Keerglen Wind Farm Co Mayo.pdf pdf File

GSI datasets relevant to EIA & SEA\_20210421.pdf pdf File

Tue 15/02/2022 14:50

Dear David,

With reference to your email received on the 08 February 2022, concerning the Scoping Report for Keerglen Wind Farm, Co Mayo, please find attached response and dataset sheet from Geological Survey Ireland.

If you have any further queries or if we can be of further assistance, please do not hesitate to contact me Trish Smullen, or my colleague Clare Glanville at [GSIPlanning@gsi.ie](mailto:GSIPlanning@gsi.ie).

Yours sincerely,

Trish Smullen  
Geological Survey Ireland

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Cc: GSI Planning  
Subject: EIS 22/33 - Scoping Report for Keerglen Wind Farm, Co Mayo

EIS 22/33

Scoping Report for Keerglen Wind Farm, Co Mayo. Request for observations by ABO Wind Ireland Ltd. Documents are enclosed.

Regards,

John

From: David Clarke (<mailto:David.Clarke@abo-wind.com>)  
Sent: 09 February 2022 13:26  
Subject: Consultation - Keerglen Wind Farm

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Dear Consultee,

ABO Wind Ireland Ltd. (ABO Wind) are seeking to develop a Wind Farm within the townlands of Keerglen, Co. Mayo.





An Roinn Comhshaoil,  
Aeráide agus Cumarsáide  
Department of the Environment,  
Climate and Communications



Geological Survey  
Suirbhéireacht Gheolaíochta  
Ireland | Éireann

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David Clarke  
ABO Wind Ireland Ltd.  
Unit 3, Aspen Court  
Cornelscourt  
Dublin D18 K400

15 February 2022

Re: Scoping Report for Keerglen Wind Farm, Co Mayo  
Your Ref: n/a  
Our Ref: 22/34

Dear David,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and advice and gather various data for that purpose. Please see our [website](#) for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

With reference to your email received on the 08 February 2022, concerning the Scoping Report for Keerglen Wind Farm, Co Mayo, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.

#### Geoheritage

Geological Survey Ireland is in partnership with the National Parks and Wildlife Service (NPWS, Department of Housing, Local Government and Heritage), to identify and select important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). This is addressed by the Geoheritage Programme of Geological Survey Ireland, under 16 different geological themes, in which the minimum number of scientifically significant sites that best represent the theme are rigorously selected by a panel of theme experts.

County Geological Sites (CGSs), as adopted under the National Heritage Plan, include additional sites that may also be of national importance, but which were not selected as the very best examples for NHA designation. All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS. CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#).

The audit of County Geological Sites of County Mayo was completed in 2014, revised in 2019 and published in November 2020. The full report details can be found [here](#). Our records show that there is no CGS in the vicinity of the Keerglen Landholding Boundary but there is a CGS in the vicinity of the potential cable route to the substation at Tawnaghmore, Killala.

**Killala Area, Co. Mayo (GR 121833, 327262), under IGH theme: IGH 7 Quaternary.** This field of discrete glaciotectonic ridges and interspersed glacial features form a body of tectonised proglacial features west of the Moy Estuary, in a coastal embayment. The site covers an area ~7km wide (west-east) at its widest point, along a coastal strip of almost 5km north-south, on the western side of the estuary, and includes numerous ridge features. Link to Site Report: [MO068](#).

With the current plan, there are no envisaged impacts on the integrity of current CGSs by the proposed development. However, if the proposed development plan is altered, please contact Clare Glanville ([Clare.Glanville@gsi.ie](mailto:Clare.Glanville@gsi.ie)) for further information and possible mitigation measures if applicable.





An Roinn Comhshaoil,  
Aeráide agus Cumarsáide  
Department of the Environment,  
Climate and Communications



Geological Survey  
Suirbhéireacht Gheolaíochta  
Ireland | Éireann

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#### Groundwater

Geological Survey Ireland's [Groundwater and Geothermal Unit](#), provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems.

Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our [Map viewer](#), which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels ([gwlevel.ie](#)). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.

The Groundwater Data Viewer indicates an aquifer classed as a 'Poor Aquifer - Bedrock which is Generally Unproductive except for Local Zones' underlies the Keerglen Landholding Boundary. Several aquifers including a 'Poor Aquifer - Bedrock which is Generally Unproductive except for Local Zones', a 'Locally Important Aquifer - Karstified', and a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones' underlie the potential cable route to the substation at Tawnaghmore, Killala.

The Groundwater Vulnerability map indicates the range of groundwater vulnerabilities within the area covered is variable. We would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' in your assessments, as any groundwater-surface water interactions that might occur would be greatest in these areas.

The Groundwater Protection Response overview and link to the main report is here: <https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/projects/protecting-drinking-water/what-is-drinking-water-protection/county-groundwater-protection-schemes/Pages/default.aspx>.

#### Geological Mapping

Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data which can be found [here](#), in your future assessments.

#### Geotechnical Database Resources

Geological Survey Ireland continues to populate and develop our national geotechnical database and viewer with site investigation data submitted voluntarily by industry. The current database holding is over 7500 reports with 134,000 boreholes; 31,000 of which are digitised which can be accessed through downloads from our [Geotechnical Map Viewer](#). We would encourage the use of this database as part of any baseline geological assessment of the proposed development as it can provide invaluable baseline data for the region or vicinity of proposed development areas. This information may be beneficial and cost saving for any site-specific investigations that may be designed as part of the project.

#### Geohazards

Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides, flooding and coastal erosion are the most prevalent of these hazards. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.

Landslides are common in areas of peat, rock near surface and in fine to coarse range materials (such as glacial tills), areas which are found within the proposed area of the wind farm development. Our records show there has been a landslide event occurring in the 1950s within the Keerglen Landholding Boundary. Geological Survey Ireland has information available on landslides in Ireland via the National Landslide Database and Landslide Susceptibility Map both of which are available for viewing on our dedicated [Map Viewer](#). Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.





An Roinn Comhshaoil,  
Aeráide agus Cumarsáide  
Department of the Environment,  
Climate and Communications



Geological Survey  
Suirbhéireacht Gheolaíochta  
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#### Natural Resources (Minerals/Aggregates)

Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our [Minerals section](#) of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our [Map Viewer](#).

We would recommend use of the Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential within the area. In keeping with a sustainable approach we would recommend use of our data and mapping viewers to identify and ensure that natural resources used in the development are sustainably sourced from properly recognised and licensed facilities, and that consideration of future resource sterilization is considered.

#### Geochemistry of soils, surface waters and sediments

Geological Survey Ireland provides baseline geochemistry data for Ireland as part of the Tellus programme. Baseline geochemistry data can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality. Tellus is a national-scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland. At present, mapping consists of the border, western and midland regions. Data is available at <https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx>. This page also hosts Geochemical Mapping of Agricultural and Grazing Land Soil of Europe (GEMAS) and litho-geochemistry (rock geochemistry) from southeast Ireland datasets. Geological Survey Ireland and partners are undertaking applied geochemistry projects to provide data for agriculture ([Terra Soil](#)), waste soil characterisation ([Geochemically Appropriate Levels for Soil Recovery Facilities](#)) and mineral exploration ([Mineral Prospectivity Mapping](#)).

#### Geophysical data

Geological Survey Ireland produces high-resolution geophysical data (Magnetic field, electrical conductivity, natural gamma-ray radiation) of soils & rocks as part of the [Tellus programme](#). These data currently cover approximately 75% of the country and provide supporting geological information on a regional scale useful for assessing environmental impact and risk.

#### Other Comments

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. Should any significant bedrock cuttings be created, we would ask that they will be designed to remain visible as rock exposure rather than covered with soil and vegetated, in accordance with safety guidelines and engineering constraints. In areas where natural exposures are few, or deeply weathered, this measure would permit on-going improvement of geological knowledge of the subsurface and could be included as additional sites of the geoheritage dataset, if appropriate. Alternatively, we ask that a digital photographic record of significant new excavations could be provided. Potential visits from Geological Survey Ireland to personally document exposures could also be arranged.

The data would be added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to the Geological Mapping Unit, at <mailto:GeologicalMappingInfo@gsi.ie>, 01-678 2795.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at [GSIPlanning@gsi.ie](mailto:GSIPlanning@gsi.ie).

Yours sincerely,

Clare Glanville  
Senior Geologist  
Geological Survey Ireland

## Appendix 2.2

### Keerglen Wind Farm Environmental Impact Assessment Report



An Roinn Comhshaoil,  
Aeráide agus Cumarsáide  
Department of the Environment,  
Climate and Communications



**Geological Survey**  
Suirbhéireacht Gheolaíochta  
Ireland | Éireann

Enc: Table - Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes.

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Irish Wildlife Trust

Dear David,

Apologies for the late reply.

Thank you for contacting us. We do not have the staff capacity to respond to this consultation at the moment but will keep it on file.

Kind regards,  
Fabiola Vieira

On Tue, 8 Feb 2022 at 13:27, David Clarke <[David.Clarke@abo-wind.com](mailto:David.Clarke@abo-wind.com)> wrote:

Dear Consultee,

ABO Wind Ireland Ltd. (ABO Wind) are seeking to develop a Wind Farm within the townlands of Keerglen, Co. Mayo.

Accordingly, we have commenced the Environmental Impact Assessment (EIA) process to support a forthcoming planning application that will be submitted to Mayo County Council. The proposed wind farm site is located circa 5.5 km to the south of Ballycastle and 15 km north of the village of Crossmolina, County Mayo.

Further details of the proposed project can be found in the attached Scoping Report. A Site Location Plan, Site Layout Plan and Grid Connection Route Drawing are also attached for your information.

We are consulting with you on this proposal as it may be of interest to you (or your organisation). While you will be presented with the opportunity to make a submission on the proposed development as part of the statutory planning process, we wanted to engage with you early in the process to make you aware of the emerging proposals and to provide you the opportunity to comment as necessary. If there are any key issues which you consider should be addressed during the preparation of the Environmental Impact Assessment Report (EIAR) we would welcome your input at this stage.

Should this consultation request be directed to another contact within your organisation we would be grateful if you could forward this information on to them, or respond to this email and provide us with the appropriate contact.

If you have any queries, or require any additional information, please do not hesitate to get in touch.

Kind regards,

David

David Clarke  
Junior Project Manager

Unit 3, Aspen Court  
Cornelscourt  
Dublin  
D18 K400  
[David.Clarke@abo-wind.com](mailto:David.Clarke@abo-wind.com)  
Phone: +353 (0)1 289 08 45  
Mobile: +353 (0)86 2363564

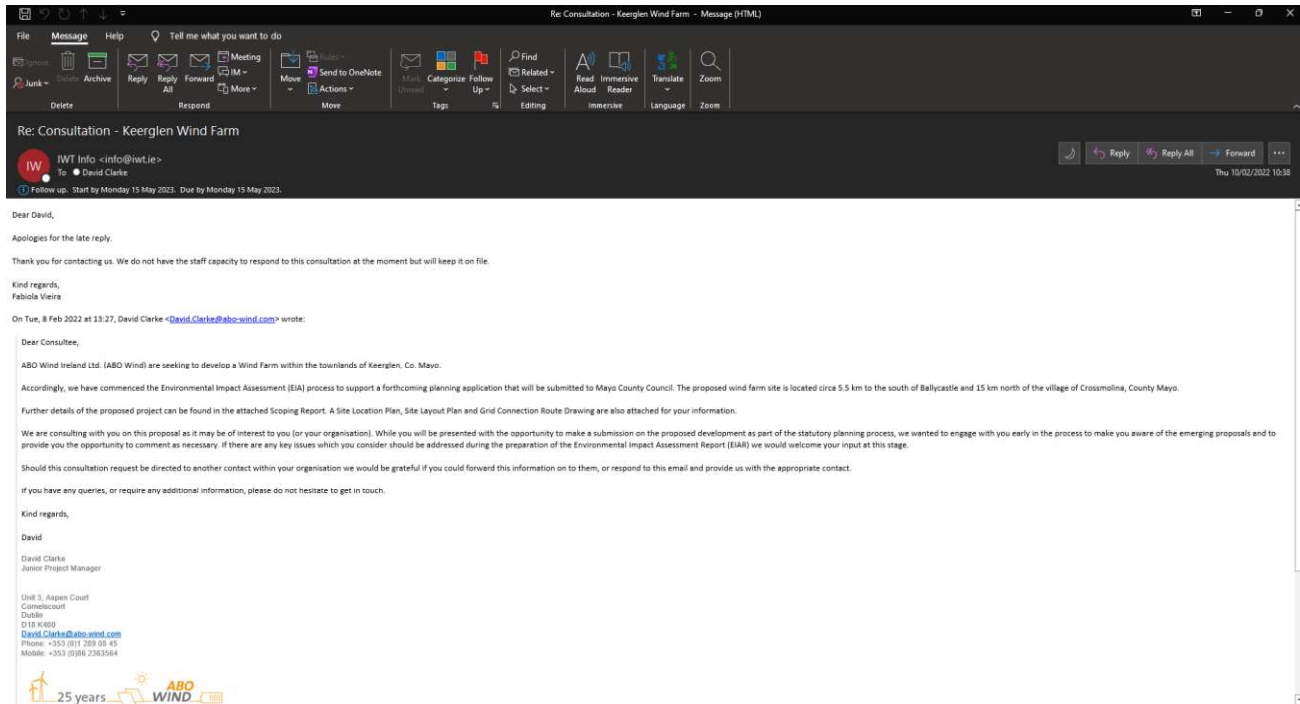
## Appendix 2.2 Keerglen Wind Farm Environmental Impact Assessment Report



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### Office of Public Works

Dear Mr Clarke,

Please find attached OPW response to email below.

Kind regards  
Karen

**From:** David Clarke <[David.Clarke@abo-wind.com](mailto:David.Clarke@abo-wind.com)>  
**Sent:** Tuesday 8 February 2022 13:26  
**Subject:** Consultation - Keerglen Wind Farm

Dear Consultee,

ABO Wind Ireland Ltd. (ABO Wind) are seeking to develop a Wind Farm within the townlands of Keerglen, Co. Mayo.

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Further details of the proposed project can be found in the attached Scoping Report. A Site Location Plan,



## Appendix 2.2

### Keerglen Wind Farm Environmental Impact Assessment Report

Site Layout Plan and Grid Connection Route Drawing are also attached for your information.

We are consulting with you on this proposal as it may be of interest to you (or your organisation). While you will be presented with the opportunity to make a submission on the proposed development as part of the statutory planning process, we wanted to engage with you early in the process to make you aware of the emerging proposals and to provide you the opportunity to comment as necessary. If there are any key issues which you consider should be addressed during the preparation of the Environmental Impact Assessment Report (EIAR) we would welcome your input at this stage.

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Kind regards,

David

David Clarke  
Junior Project Manager

Unit 3, Aspen Court  
Cornelscourt  
Dublin  
D18 K400

[David.Clarke@abo-wind.com](mailto:David.Clarke@abo-wind.com)

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Re: Consultation - Keerglen Wind Farm - Message (HTML)

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Open Recent Delete Archive Reply Reply All Forward IM Move Send to OneNote Mark Categorize Follow Find Read Immersive Translate Zoom

Re: Consultation - Keerglen Wind Farm

Drainage Admin <drainage.admin@opw.ie>  
To: David Clarke

AD Foreman & Drivers Map - OPW Scheme Channels (2).pdf  
OPW Response\_Keerglen Wind Farm.pdf

Figure 3 - Cable Route.pdf  
Figure 2 - Site Layout Plan.pdf  
Figure 1 - Site Location Map.pdf

Dear Mr Clarke,

Please find attached OPW response to email below.

Kind regards  
Karen

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Sent: Tuesday 8 February 2022 13:26  
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If you have any queries, or require any additional information, please do not hesitate to get in touch.

Kind regards,  
David  
David Clarke  
Junior Project Manager  
Unit 3, Aspen Court



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Mr. David Clarke  
ABO Wind Ireland Ltd  
[David.Clarke@abo-wind.com](mailto:David.Clarke@abo-wind.com)

Our Ref: 74 -2022

**Re: Keerglen Wind Farm**

Dear Mr Clarke,

I refer to the above and your correspondence dated 8<sup>th</sup> February 2022.

The following are the Office of Public Works (OPW) comments:

There are no Arterial Catchment Drainage Schemes under the responsibility of OPW located within the area of the works proposed.

The potential cable route of the ESB transmission line is located north of the OPW Moy Arterial Drainage Scheme channels. If the potential route significantly changes and interferes with OPW drainage channels in this area, this office would request to be consulted on location and measure to protect ESB transmission line.

This office has no records of flooding or past flood events within the above townland as identified on <https://www.floodinfo.ie/map/floodmaps/>

Please note that under S.I No. 122/2010 – European Communities (Assessment and Management of Flood Risks) Regulations 2010 no person, including a body corporate, shall construct any new bridge or alter, reconstruct, or restore any existing bridge over any watercourse without the consent of the Commissioners or otherwise than in accordance with plans previously approved by the Commissioners. Where the development intends to install a culvert or bridge over a watercourse as part of the development Section 50 approval will be required in advance from the Commissioners of Public Works.

This office would recommend that no flooding should occur during or after construction of the proposed wind farm.

Yours sincerely,

**Karen Donovan**  
Engineering Services Administration Unit  
24<sup>th</sup> March 2022

Ceann Oifig, Sraid Jonathan Swift, Baile Átha Troim, Co. na MI, C15 NX36  
Head Office, Jonathan Swift Street, Trim, Co. Meath, G15 NX36  
T +353 46 942 6000 | [info@opw.ie](mailto:info@opw.ie)  
[www.opw.ie](http://www.opw.ie)



RECEIVED: 29/08/2024

Hi David,

Please see attached letter from Irish Peatland Conservation Council regarding the proposed Keerglen Windarm.

Please confirm receipt and thank you for allowing us to make comments on this project.

Tristram Whyte BSc (Hons) Applied Freshwater & Marine Biology  
Conservation, Policy & Fundraising Officer  
Irish Peatland Conservation Council  
Lullymore  
Rathangan  
Co. Kildare  
R51 V293

045 860133

[bogs@ipcc.ie](mailto:bogs@ipcc.ie)

CHY6829

Registered Charity Number 20013547

Visit <http://www.ipcc.ie> to learn all about the Save the Bogs Campaign or to arrange your visit to the Bog of Allen Nature Centre

On 8 Feb 2022, at 13:25, David Clarke wrote:

Dear Consultee,

ABO Wind Ireland Ltd. (ABO Wind) are seeking to develop a Wind Farm within the townlands of Keerglen, Co. Mayo.

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If you have any queries, or require any additional information, please do not hesitate to get in touch.

Kind regards,

David  
David Clarke

Appendix 2.2  
Keerglen Wind Farm Environmental Impact Assessment Report  
Junior Project Manager

Unit 3, Aspen Court  
Cornelscourt  
Dublin  
D18 K400  
[David.Clarke@abo-wind.com](mailto:David.Clarke@abo-wind.com)  
Phone: +353 (0)1 289 08 45  
Mobile: +353 (0)86 2363564

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Re Consultation - Keerglen Wind Farm - Message (HTML)

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Show Message

Re: Consultation - Keerglen Wind Farm

TW

Tristram Whyte <bogs@ipcc.ie>

To • David Clarke

Keerglen\_IPCC\_17.2.2022\_A\_.pdf

pdf File

ReplyReply AllForward

Thu 17/02/2022 16:54

Hi David,

Please see attached letter from Irish Peatland Conservation Council regarding the proposed Keerglen Windfarm.

Please inform ranger and thank you for allowing us to make comments on this project

Tristram Whyte BSc (Hons) Applied Freshwater & Marine Biology  
Conservation Policy & Fundraising Officer  
Irish Peatland Conservation Council  
Lullymore  
Rathangan  
Co. Kildare  
R53 V293

085 806133  
[bogs@ipcc.ie](mailto:bogs@ipcc.ie)  
0918823  
Registered Charity Number: 10011947  
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Kind regards,

David  
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[David.Clarke@abo-wind.com](mailto:David.Clarke@abo-wind.com)  
Phone: +353 (0)1 289 08 45  
Mobile: +353 (0)86 2363564

24



## IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNAITHE PHORTAIGH NA HÉIREANN

Lullymore, Rathangan, Co. Kildare, Ireland R51 V293  
Liolach Mór, Rath Iongáin, Co. Chill Dara, Éire, R51 V293

Tel/Faill: +353-(0)45-860133  
e-mail: riamphost.bogs@ipcc.ie web/idiríort: www.ipcc.ie

17th February 2022

David Clarke  
Junior Project Manager  
ABO Wind Ireland Ltd.  
Unit 3 Aspen Court  
Cornelscourt  
Dublin  
D18 K400  
David.Clarke@abo-wind.com

Re: Proposed Keerglen Wind Farm, Co. Mayo - Scoping Report

Dear Mr Clarke,

Thank you for consulting the Irish Peatland Conservation Council regarding the proposed windfarm. The Irish Peatland Conservation Council (IPCC) was established in 1982 and has 40 years of experience in peatland conservation. Our aim is to conserve a representative sample of intact peatlands. Only 18% of Ireland's original range of peatland habitats are deemed worthy of conservation. 82% have become degraded from multiple pressures such as peat extraction, agriculture, forestry, habitat fragmentation and developments (Ireland's Peatland Conservation Action Plan 2020, Malone & O'Connell, 2009). Specifically, County Mayo has only 33% of the original peatland habitat in a conservation worthy state (Peatlands & Climate Change Action Plan 2030, O'Connell, 2021). This has had a major effect on biodiversity and the ecological functioning of the County's indigenous habitats and species. This makes it imperative that all must be done to halt the loss of any more wildlife during the climate and biodiversity emergency which was declared by Government in 2019.

Our work is guided by our 6th Action Plan "Ireland's Peatland Conservation Action Plan 2020" and a recent amendment "Peatlands & Climate Change Action Plan 2030", which focuses on the role of peatlands in tackling predicted climate change. These documents are available for download on our website at [www.ipcc.ie](http://www.ipcc.ie). Many of the actions in our plan have been included within the National Peatlands Strategy which has been adopted by every Government Department and Local Authority. The "National Peatlands Strategy" can be downloaded from [www.npws.ie](http://www.npws.ie).

While we are not inherently opposed to the construction of wind farms as we understand that Ireland has legal obligations to provide 80% (Climate Action Plan 2021) of its energy production from renewable sources by 2030, there is however a responsibility on wind farm developers to ensure that there is no loss of important peatland habitat and the species that utilise it through the development of wind farms. Also, bad construction practices can result in an active carbon sink being converted to a carbon source which is detrimental to any effort in combating anthropogenically caused global climate change.

We have a number of concerns pertaining to the proposed development which need to be given due consideration within the pre-planning stage before IPCC could support the project.

### Legal Obligations to Protect Peatlands

We are legally bound by National and European legislation (The Wildlife Acts, EU Habitats and Bird's Directives) and international conventions (Ramsar, Bern Convention, Convention on Biological Diversity) to do our utmost to protect peatlands now and for future generations. Peatland habitats have been severely diminished in the country and this destruction is an issue in other legislation and conventions such as the UN Convention on Climate Change, Bonn Convention, World Heritage Convention, Water Framework Directive, Environment Liability Directive, Planning and Development Acts, National Monuments Acts, Environmental Directive, EIA and SEA. All of these legislative instruments have been adopted by Ireland and the IPCC ask that you assess your development with regard to these legal obligations.

## 40 YEARS TAKING ACTION FOR BOGS AND WILDLIFE

Charity No/Uimhir Carthanacht: CHY0829 Registered in Ireland No/Uimhir Cláráithe in Éire: 116156 Registered Office/Oifig Cláráithe: Lullymore, Rathangan, Co. Kildare, R51 V293, Ireland  
Governance Code Statement of Compliance: IPCC confirm that our organisation complies with The Governance Code for the Community, Voluntary and Charitable Sector in Ireland.

Company Secretary/Rúnaí Comhlachta: Rachel Kavanagh  
Directors/Stiúrthóir: Martin Kelly, Catherine O'Connell, Rachel Kavanagh, Jennifer Roche, Seán Ó Fearghail  
Patrons/Pátrúnaí: Pauline Bewick, Don Conroy, HRH Princess Irene of the Netherlands,  
Eanna Ní Lamhna, Matthijs Schouten, His Excellency Mr Peter Kok Netherlands Ambassador to Ireland



#### Bogland

The IPCC would advise any developer planning construction in, or within close proximity to peatland habitat to be familiar with the Environmental Protection Agency funded project BOGLAND ([www.ucd.ie/bogland](http://www.ucd.ie/bogland)). This project recommends the best practice guidelines to ensure no damaging development occurs on, or affects peat soils and peatlands of conservation value. Its overall objective was to develop guidance in the development of strategies for the sustainable future management of peatlands in Ireland. To this effect, the report aimed to provide a synthesis of knowledge on this key natural resource, the important functions and roles that peatland ecosystems perform, their various utilisations and how attitudes and policies affect them.

We urge developers to properly assess and screen for any adverse impacts on the habitat or species utilising them that may occur during the construction of any infrastructural development such as wind farms. We would also implore developers to have proper plans in place for the habitat regarding after-use rehabilitation/restoration. The IPCC could not support a development that does not practice conservation responsibly.

#### Designated Sites (See Map 1)

The Irish Peatland Conservation Council have identified a number of designated sites within the proximity of the proposed wind-farm which need to be given due attention in ascertaining the impacts to biodiversity from the proposed project. In particular, developments have the potential to disrupt the hydrology of peatland and even small impacts to the water table may have disastrous consequences for specialised peatland species that live within minimal ranges of chemical and hydrological limits, such as the *Vertigo* whorl snails. Developers need to ensure that their project in no way affects the integrity of the habitats and qualifying interests including species of the designated sites. The cumulative affect of all developments, proposed and granted, within a suitable distance, must also be assessed for their impacts on designated sites.

#### Glenamoy Bog SAC (Sitecode 000500)

The National Parks and Wildlife Service Site Synopsis (SAC&NHA) describes Glenamoy Bog Complex SAC as being dominated by blanket bog, and is a prime example of extreme oceanic lowland-atlantic blanket bog, a priority ANNEX I habitat under the EU Habitats Directive. Dystrophic lakes, wet heath, juniper heath and transition mire have been identified at Glenamoy Bog Complex and are qualifying interests as they are also ANNEX I Habitats. There is a large flush at Rathavisteen which is described as being one of the largest and best examples within North Mayo. Poor fen has also been identified and while it is not listed as an ANNEX Habitat it is recommended within A Guide to Habitats in Ireland (Julie A. Fossit, 2000, The Heritage Council) that it should be regarded as being of Special Conservation Importance.

There is also a number of species that require investigation to ensure that the proposed development does not interfere or destroy important refugia or displace important species hindering Ireland's recovery from the Climate Change and Biodiversity Emergency declared by Government in 2019. Otter (ANNEX II&IV, Irish Wildlife Acts), Red Grouse (Red Listed, BOCCI), Merlin (ANNEX I, Amber Listed, BOCCI), Peregrine Falcon (ANNEX I), Golden Plover (ANNEX I, Red Listed, BOCCI), Barnacle Geese (ANNEX I, Amber Listed, BOCCI), Atlantic Salmon (ANNEX II&IV, Vulnerable Listed, Ireland Red List No.5), Badger (Irish Wildlife Acts), and Irish Hare (ANNEX IV, Irish Wildlife Acts) have all been identified on site and current populations need to be described and possible pathways to disruption of these species needs to be investigated before any project gets permission.

The Site Synopsis also states that over-grazing has caused erosion to the blanket bog, machair and heath habitats while peat extraction for turbarry, hand-cut and mechanical is also widespread within the designated site. Afforestation has surrounded the site with conifer plantations and is also listed as a threat.

The IPCC Sites Database lists Glenamoy SAC as being under threat from recreation, erosion, infrastructural developments, burning and drainage. The construction of the Corrib Gas Pipeline has also affected the integrity of the site.

Some restoration works have been undertaken by Coillte as part of the Coillte Blanket Bog Restoration Project 2002 - 2006 where windrowing, forestry removal and drain-blocking was carried out. It is important that this area is not affected by any proposed development.

Rhododendron has been recorded at Glenamoy SAC and this needs to be investigated as invasive species are detrimental to the conservation objectives of Glenamoy SAC.

An area within the Glenamoy SAC was also featured within a study in the 1970s as part of the International Biological Programme further highlighting that the habitats contained are of international importance and should be protected from any developments.

Glenamoy Bog Complex has a vast array of wetland habitats and any proposed development needs to ensure using best practice that no detrimental affects will occur to the hydrology of the designated conservation area or the species utilising the site.

The Irish Peatland Conservation Council are aware of a national walking route "Benwee Head Loop". Any development needs to ensure that it does not interfere with the views and tone of the trails which are amenity and tourist attractions.

#### Bellacorrick Bog Complex (Sitecode 000192)

This site, as described by the National Parks & Wildlife Service as being predominantly lowland blanket bog (with outstanding pool development) but also containing intermediate and raised bogs of varying quality. Flushes, which are spring-fed and species rich feature throughout the site which has a well-developed pool system and is also home to the largest assemblage of fen vegetation in Ireland. "It is considered to be of international importance due to the extent of the individual areas of bog and the wide variety of habitats present and because of the presence of a number of rare and threatened plant and animal species" (NPWS Site Synopsis). A number of rare and threatened species have been recorded on site and listed within the Site Synopsis and these need to be investigated to ascertain their susceptibility to disruption from the proposed development before any project is given approval.

*Vertigo geyeri* (ANNEX II, Vulnerable, Red List No.2) and Greenland White-Fronted Goose (ANNEX I, Amber Listed, BOCCI) have been identified within the Site Synopsis and need to be given the due regard to ensure no detrimental affect occurs on those



## Appendix 2.2

### Keerglen Wind Farm Environmental Impact Assessment Report

species as a result of poor planning.

The IPCC Sites Database also holds records of *Vertigo substriata* (Near Threatened, Red List No.2) and *Philonotis fontana* (rare moss) which also needs to be given due regard as a small change in the hydrology of the site could impact drastically on these species.

The invasive species *Sarracenia purpurea* is present in Bellacorrick Bog East (G 010 170) and Bellacorrick Bog South (F 930 180). It was also introduced in 1963 to Moneyieran Bog (F 990 190). The National Parks and Wildlife Service have an ongoing project to remove invasive species from Special Areas of Conservation as they are affecting the integrity of the site. Please liaise with NPWS in this regard.

There has been some restoration work in Eskeragh (G 050 180), Eskeragh North (G 055 190), Shanvolahan, Carravokeen and Derry as Part of the Coillte Blanket Bog Restoration Project 2002- 2006 where drains on the bog were filled and forestry was removed. These areas need to be protected from the proposed development so as to not undo the progress in conservation made.

The Irish Peatland Conservation Council are aware of a national walking route "The Western Way" where the views and wild nature of the designated trails give recreational value to the area encompassing the designated sites. Any development needs to ensure that it does not interfere with the views and tone of the trails which are amenity and tourist attractions.

#### Inagh Bog NHA (Sitecode 002391)

Inagh Bog NHA is of conservation importance as it contains lowland, mountain and transitional blanket bog.

Overgrazing, burning and drainage have been identified by the National Parks and Wildlife Service as causing erosion which is regenerating back as wet and dry heath. High quality upland habitat is present as flushes and regenerating cutover bog. Commercial forestry has impacted adjacent lands and renewable energy projects with their associated infrastructure are potential threats to the site. There are a number of protected and Red Listed species present such as Golden Plover (ANNEX I, Red Listed, BOCCI, confirmed breeding on site), Red Grouse (Red Listed, BOCCI), Irish Hare (ANNEX V, Irish Wildlife Acts), Common Frog (ANNEX V, Irish Wildlife Acts) and Common Lizard (Irish Wildlife Acts). These species need to be protected from developments that have the potential to disturb behaviour and habitat. The plants listed in the NPWS Site Synopsis also need due regard as hydrological changes to the habitats may affect their distribution. Any development needs to ensure that peatland habitats are not lost through poor hydrological planning and management.

#### Ummerantarry Bog NHA

The site synopsis points out that this site is one of only a few left from the area that has not been lost to overgrazing, burning, afforestation, drainage and turbarry. This highlights the need to protect these upland peatland habitats, especially as active peat-cutting is taking place. The development of a windfarm will also increase the pressures faced by these habitats and could reduce the conservation potential, as described within the site synopsis. Golden Plover have been recorded breeding on site (ANNEX I, Red Listed, BOCCI) and best practice in surveying needs to be adhered to along with ascertaining potential threats from the proposed development. Any loss of this species is not acceptable and the IPCC could not support a project which does not support the conservation objectives of designated sites.

#### Forrew Bog NHA

Forrew Bog contains intact lowland blanket bog making the site important for conservation with good examples of interconnecting pool complexes, wet lawns with hummocks and hollows. Species recorded as present within the Site Synopsis include Irish Hare (ANNEX V, Irish Wildlife Acts), Snipe (Amber Listed, BOCCI) and Meadow Pipit (Red Listed, BOCCI). Damage has occurred through dumping and peat extraction (some with the sausage machine which if seen needs to be reported to the Environmental Protection Agency, the National Parks and Wildlife Service and the Local Authority). Commercial forestry, as with the other designated sites in this area has damaged the site and is also an ongoing threat. IPCC could not support any proposed development which does not take these concerns on board and ensure that either their project can alleviate or at least not add to the ongoing conservation issues.

#### Nitrogen Deposition

In 2018 in the UK 39 of 57 Special Areas of Conservation listed on the APIS website (<http://www.apis.ac.uk>) exceeded the Critical Load Threshold for nitrogen. This is having negative impacts on the vegetation of the designated habitats. There are various sources of excess nitrogen such as construction (e.g. roads, developments), urban waste water (pollution) and agriculture (e.g. fertilizer/pig-gerys) and can enter a habitat via wet or dry deposition. The proposed development needs to account for nitrogen within pre-planning coupled with a nitrogen monitoring agenda which could highlight possible pathways of nutrient enrichment. This also has to be assessed cumulatively taking into account neighbouring proposed and granted developments which may be connected with this project. Peatlands are naturally nutrient poor and the excessive loads can decimate botanical species.

#### Biosecurity

Peatlands are susceptible to invasive species when they are drained and/or degraded as when the peat dries out it allows species which would not normally survive in the wet acidic conditions to take hold. The introduction of invasive species can exacerbate erosion and transpiration increasing degradation of the peatland. They can be introduced by many vectors such as traffic, which is increased through developments and fragmentation of the peatland habitat as access roads and construction lorries traverse and fragment the landscape. The movement of soils and machinery has to be monitored in and out of construction sites to ensure that best practice in relation to biosecurity is adhered to. The effects of fragmentation and increasing traffic and how they increase the risk of invasives needs to be accounted for in the pre-planning stage. The IPCC could not support a project that does not assess the risks in relation to the spread of invasive species. Please refer to [www.npws.ie](http://www.npws.ie), National Biodiversity Action Plan 2017-2021 and Ireland's Peatland Conservation Action Plan 2020 for information regarding the need to control invasives.



#### National Monuments

Peatlands in Ireland hold a great deal of cultural and ancestral history, preserved in the anaerobic conditions. Ireland has international obligations under the European Convention on the Protection of the Archaeological Heritage, ratified by Ireland in 1997. Article 1 of this convention states that Ireland must “protect the archaeological heritage as a source of the European collective memory and as an instrument for historical and scientific study”. The IPCC need to see that there will be scientific supervision from an independent body that will evaluate the proposed windfarm area for its archaeological importance. The IPCC could not support the development before a full archaeological survey is undertaken and the necessary precautions and mitigations are in place to ensure that no loss of archaeological information and cultural history occurs.

#### Water Framework Directive (See Map 2)

Ireland has legal obligations under the WFD to ensure that all rivers and lakes are of “Good Ecological Status” by 2027. Please ensure that the proposed development will not adversely impact on the water quality and lower Ireland’s standing with our legal obligations in protecting our waterways. Silt runoff and chemical/construction pollution can be disastrous for aquatic wildlife and this should also be factored into the management and construction plans of the proposed development. IE\_WE\_33K010200 is of good quality and its status needs to be protected from the development. IE\_WE\_33B010100 has been assessed as “Poor” by the EPA so it needs to be ascertained as to what has caused the degradation of ecological quality and what effect the proposed development would have on this ecological status. Some rivers which have not been assessed by the EPA under the Water Framework Directive should be surveyed for baseline data and monitored throughout construction/during the operation of the proposed wind farm and plans need to be in place should any change of the ecological status occur.

#### Curlew

The Curlew is one of the most endangered species in Ireland and the breeding population has declined by 78% over the past 40 years with less than 130 breeding pairs left (Birdwatch Ireland I-WeBS Newsletter August 2017). The IPCC would like to remind you that this bird is listed as an ANNEX II section II bird species within the E U Birds Directive [Council Directive 79/409/EEC] and also has a national status of Red on the Birds of Conservation Concern in Ireland list. The Curlew Conservation Programme (NPWS) is working to bring this species back from near extinction in Ireland and we would urge developers to liaise with them and BirdWatch Ireland in relation to any development. Breeding Curlew are site specific and will possibly not return if there are construction and operational disturbances from the proposed development. This needs to be scrutinized with ornithological surveys within the recommended survey times for breeding Curlew to ascertain as to whether they are present and if they utilise the site for any other purposes such as foraging. The operational turbines may also affect the Curlew’s local migration routes. It would be disastrous if this project was to contribute to the further decline of this nearly extinct species. This also has to be assessed cumulatively with neighbouring proposed and granted developments.

#### Wetland Surveys Ireland

Wetland Surveys Ireland ([www.wetlandsurveysireland.com](http://www.wetlandsurveysireland.com)) have identified a number of wetlands which have had or need to have an ecological survey to ascertain the biodiversity and ecological value within them. Owena Pollaphusca Fen WMI\_MA65 (internationally important), Glenora Glencullin Ballykinlettragh WMI\_MA1120 (survey required), Cloyagh Cutover Complex WMI\_MA1118 (survey required), Altderg Loughs East WMI\_MA1117 (survey required) are all within proximity to the proposed development. Please liaise with WSI to gather as much information about these sites as possible and ensure that the proposed development will not have an adverse effect on the habitats or species that are utilising them or moving/migrating between them and other significant sites. North-Western Europe has lost ~90% of its wetlands (BOGLAND, EPA, 2011) and it is imperative that all is done to halt the loss of this important climate regulating, carbon sequestering and biodiverse landscape.

#### Dark Sky Reserves

County Mayo is home to a Dark Sky Reserve within the Ballycroy area and the proposed development has the potential to affect the natural night-time illumination levels. The proposed project needs to ensure that it does not impact on the dark sky objectives of the reserve which encourages astronomy tourism of clear skies away from light polluted populated areas. Dark skies are also beneficial for the conservation of species as light pollution has been identified as a threat to many insect and bird species whose natural behaviour has been disrupted by increasing light levels. Any proposed development needs to have a lighting plan that is sensitive to the surrounding environment in regards to biodiversity, natural night sky illumination and cumulative impacts from neighbouring developments.

#### Landslide Events (See Map 3)

Looking at the Geological Surveys of Ireland’s Landslide Events Map it is possible to see that there a number of historic peat slide events recorded close to the proposed area. It has come to IPCC’s attention that current best-practice methods for assessing the probability and/or risk assessment for peat slippage and bog bursts/flows may not be fit for purpose. There has been a number of peat events in recent times, such as the Meenbog bog flow, Boleybrack Mountain peat slide and the Knockanefune Mountain bog slide and there is uncertainty over what caused them as there are confounding variables such as afforestation, developments (such as access roads), overgrazing, drainage, turbuany and rainfall. The proposed location for the Keerglen Windfarm must also take into account the cumulative impacts from neighbouring developments such as the Glenora Windfarm which is proposed just north off this project.

Peat has an exceptionally high water content, is a low density material with low compressive strength. Disturbed peat also has a low shear strength. These parameters allow long runouts to develop when there is a peat failure with the potential to destroy aquatic wildlife directly and down stream. The possibility and extent of runouts could be examined further to ascertain where these might



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### Keerglen Wind Farm Environmental Impact Assessment Report

occur, what paths they would take and what would be at risk environmentally. This of course has to be dove-tailed with proper contingency and management plans in the event of an actual peat-slide. There is a high possibility that if there is a peat slide event it would affect neighbouring designated sites which would be unacceptable and disastrous. If there is a possibility of any more damage occurring to the designated sites and ANNEX habitats as a result of this development then the project should not go ahead. It is stated within the Scoping Report that turf cutting is occurring on site. This needs to be assessed within the peat stability tests as does all neighbouring proposed and granted developments, such as the Glenora Windfarm proposed just north of this project.

#### BirdWatch Ireland Species Sensitivity to Windfarms (See Map 4 & Map 5)

A study conducted by BirdWatch Ireland on the sensitivity of certain bird species to windfarm developments shows that Golden Plover and Red Grouse need to have a focused survey initiated as they have shown sensitivity in this proposed location and need due attention and assessment to determine if they will be affected by this development.

#### Conclusion

The proposed windfarm is situated within an area of high biodiversity, ANNEX I habitat and surrounded by designated sites. The risk to these from construction coupled with the already degraded nature of some of the areas would put them at increased strain with disastrous consequences to the aquatic and terrestrial environment if there is a peat slide. The developers also need to assess the cumulative effects of windfarms, afforestation, peat extraction, drainage, overgrazing on the environment - specifically including the designated sites, carbon sequestration and also assess the implications of impacts on annexed species and biodiversity. It is IPCC's understanding that the peat soils will still be drained while the turbine (hardstands) are being constructed and operational. What will be the impact of this on the Water Framework Directive and carbon storage compared to straight restoration of the habitat, such as forestry removal and drain blocking? Taking into account that the peatland, once restored, would last for 1000s of years (sequestering carbon and providing refugia for biodiversity) and that off-shore windfarms are being planned, is it appropriate to fragment and destroy one of the rarest habitats in Europe even more than it is at present?

There are concerns, especially with species such as Curlew, where disturbance from turbines displaces and dissuades them from returning as they are site specific (Higgins et al, 2009). This would negate the point of providing areas of conservation in the first place. As the amount of blanket bog in County Mayo has been reduced to 33% of the original resource of blanket bog, a globally unique habitat, and as the amount of wetlands in Europe have been lost to less than 10% (BOGLAND, EPA, 2011), it is imperative that they are protected from development or Ireland will not recover from the Climate and Biodiversity Emergency. The carbon cost of this project needs to also be accounted for, and this has to also include the other habitat degrading activities such as forestry, peat extraction and fragmentation (roads/cabling etc, already present and proposed as part of this project) over the lifespan of the project. Any future plans to upgrade the turbines also needs to be a feature of this proposal, along with the proposed impacts.

Thank you for reading through our concerns.



Tristram Whyte B.Sc (hons) Freshwater Biology  
Conservation Policy & Fundraising Officer - IPCC

The distribution of breeding birds around upland windfarms, James W. Pearce-Higgins, Leigh Stephen, Rowena H. W. Langston, Ian P. Bainbridge and Rhys Bullman, 2009, Journal of Applied Ecology.

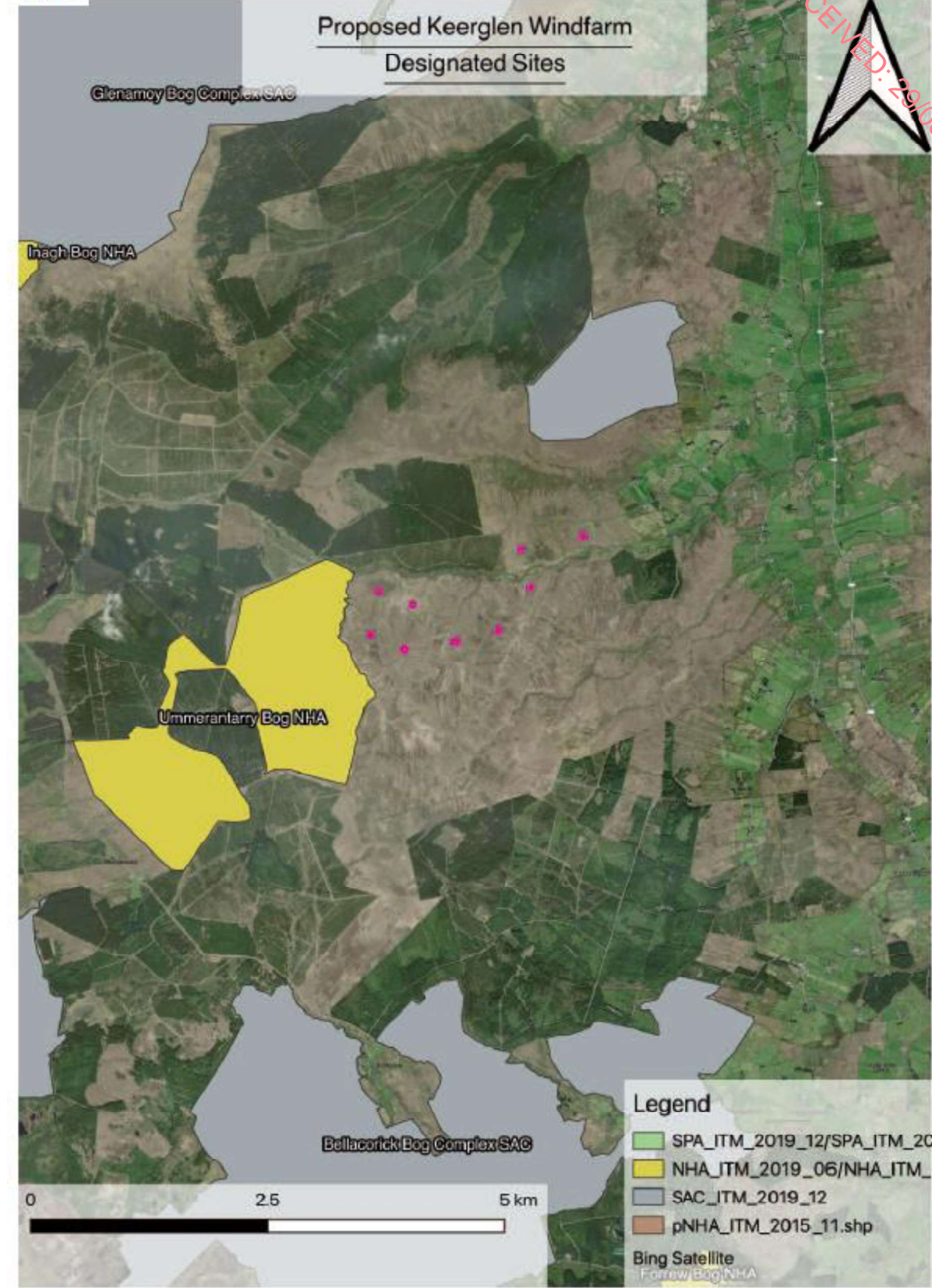
Peatlands and Climate Change Action Plan 2030, O'Connell, C.A., Madigan, N., Whyte, T. & Farrell, P., 2021, Irish Peatland Conservation Council.

Ireland's Peatland Conservation Action Plan 2020, Sarah Malone B.A. Heritage Studies, Dr Catherine O'Connell, The Irish Peatland Conservation Council, 2009.

EPA STRIVE Programme 2007-2013 - BOGLAND: Sustainable Management of Peatlands in Ireland, Florence Renou-Wilson, Tom Bolger, Craig Bullock, Frank Convery, Jim Curry, Shane Ward, David Wilson and Christoph Müller, 2011, Environmental Protection Agency & University College Dublin.

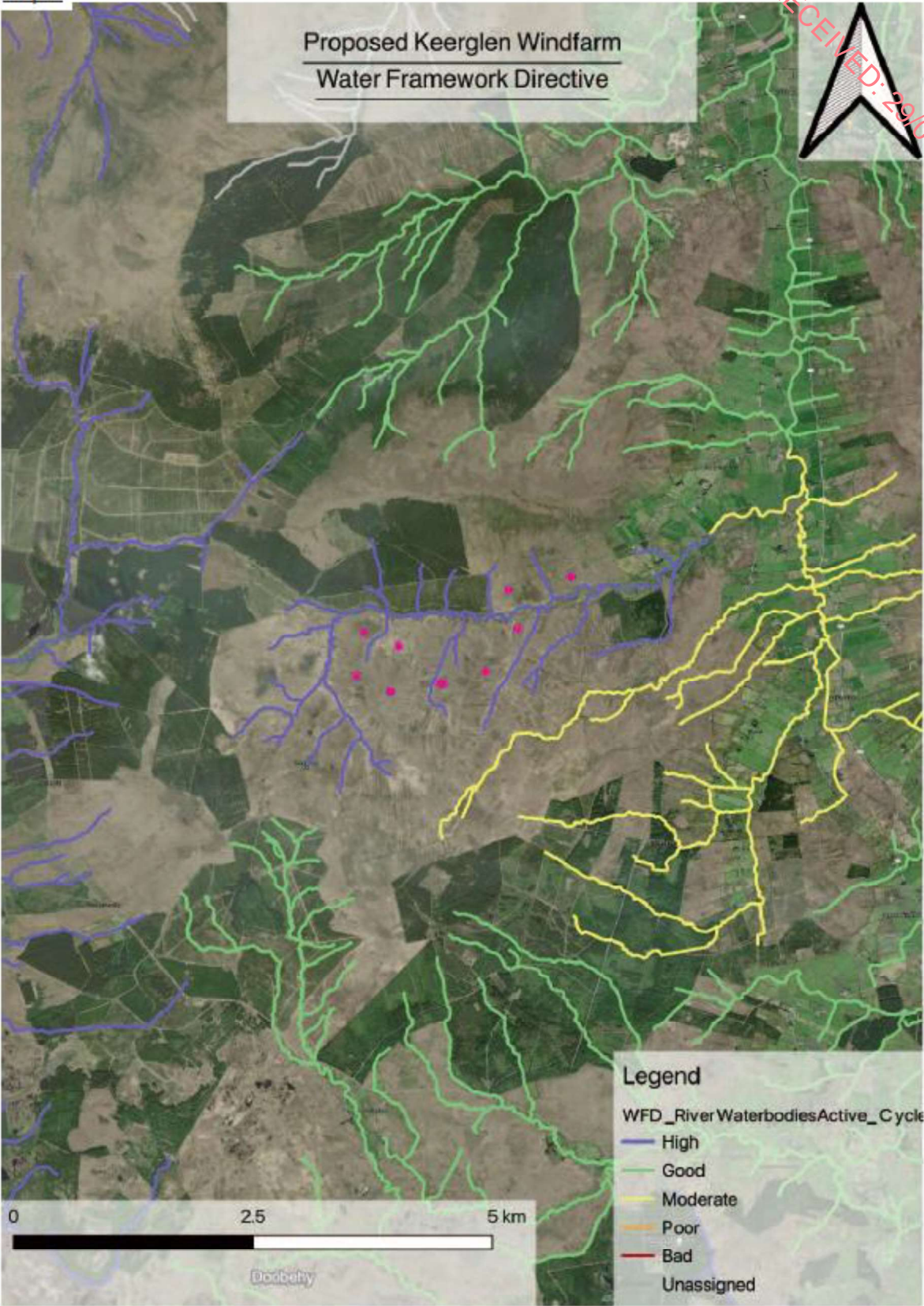


Map 1



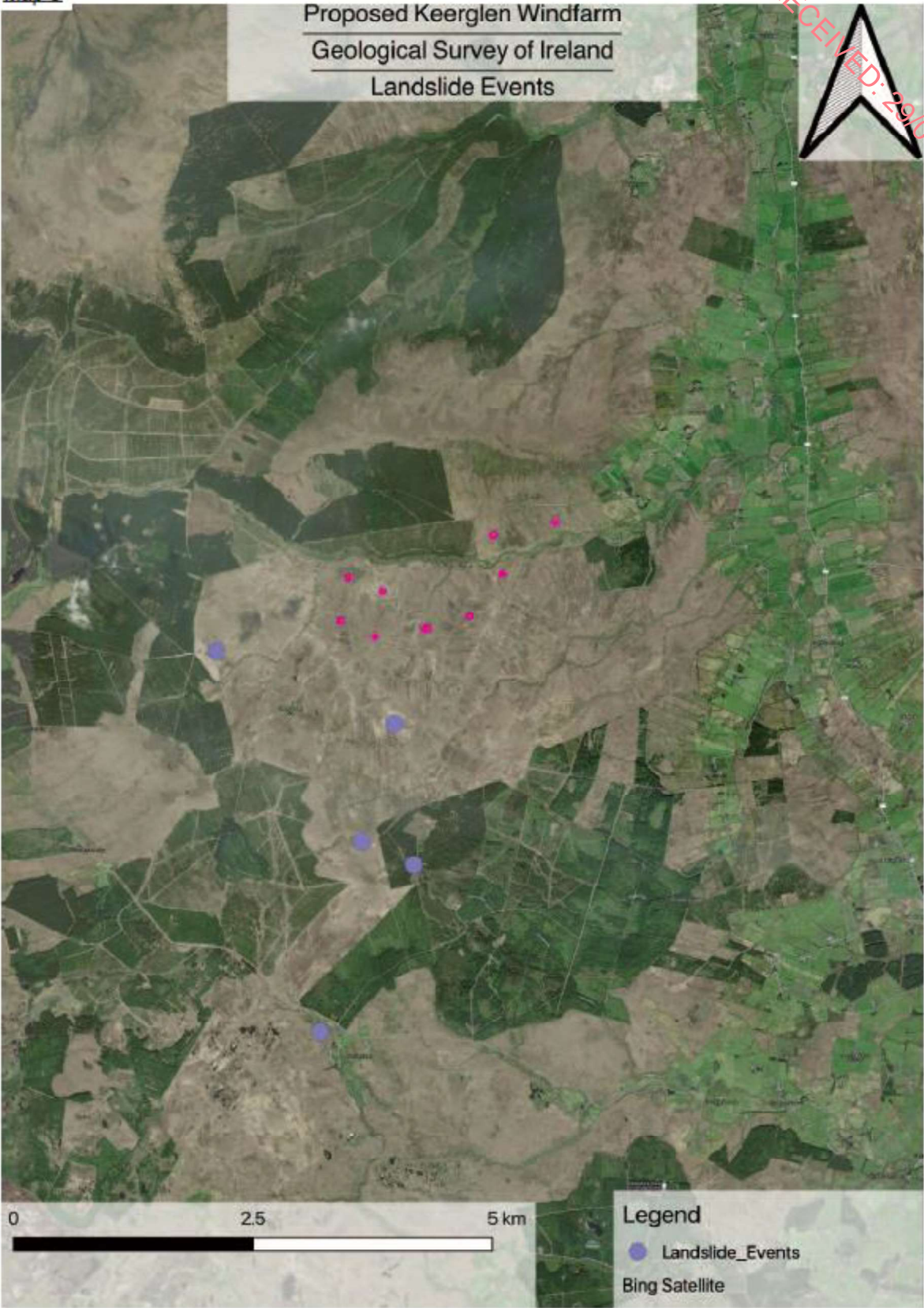


Map 2

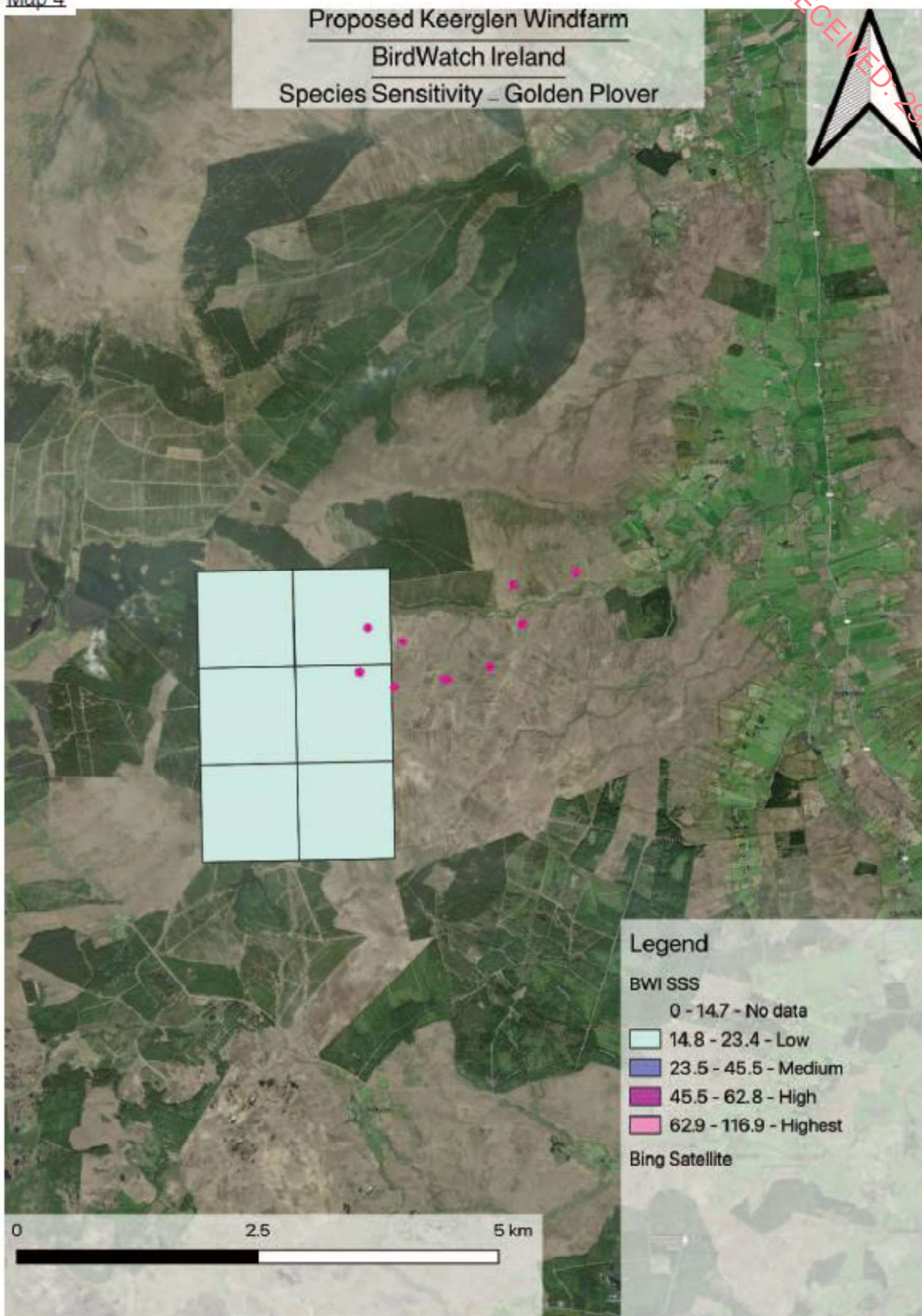




Map 3

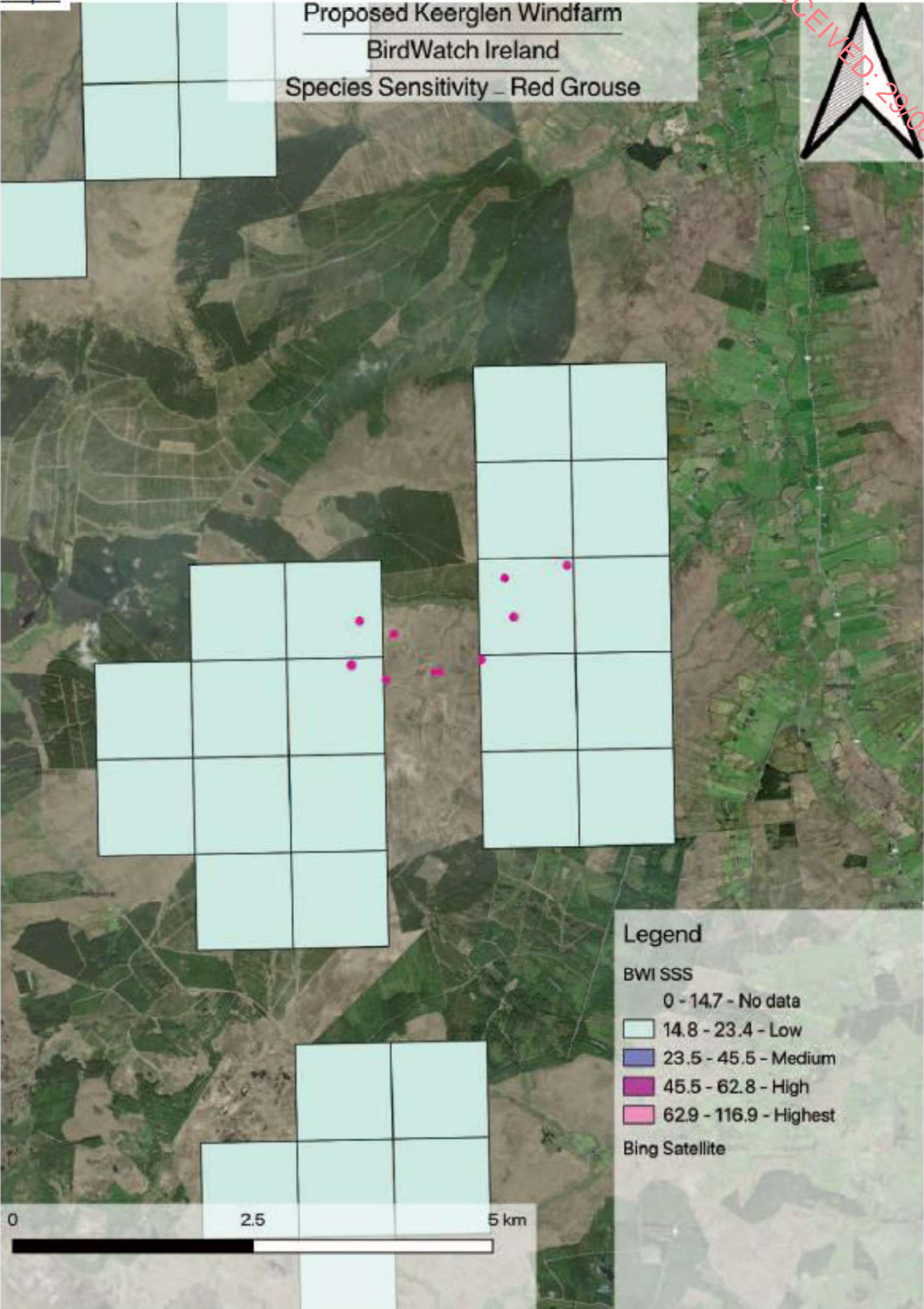


Map 4





Map 5



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**Appendix 2.2**  
**Keerglen Wind Farm** Environmental Impact Assessment Report  
**Health Service Executive**

Good afternoon,

Please find attached Environmental Health Service (Mayo) submission in relation to the above proposed development.

I would appreciate acknowledgement of your receipt of same.

Kind regards,

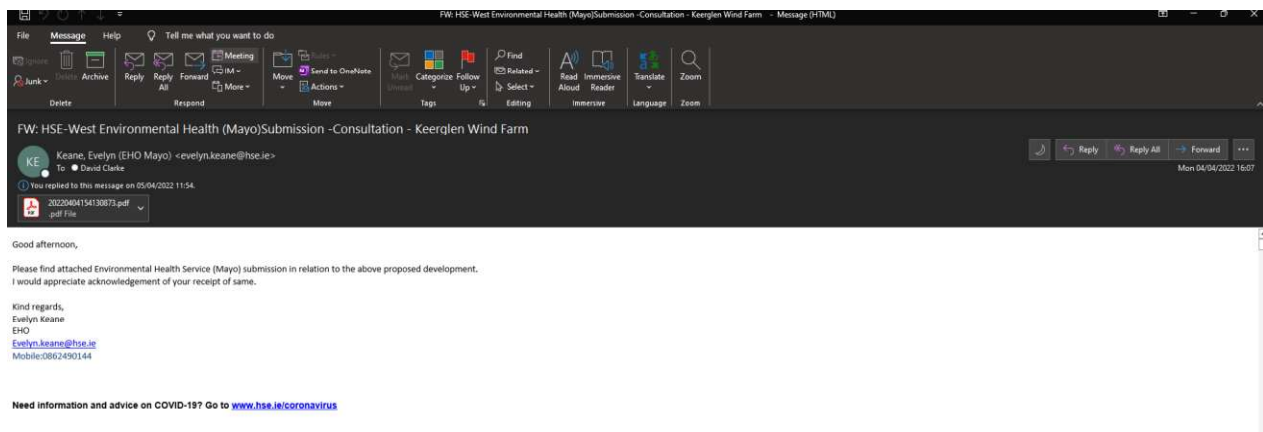
Evelyn Keane

EHO

[Evelyn.keane@hse.ie](mailto:Evelyn.keane@hse.ie)

Mobile:0862490144

Need information and advice on COVID-19? Go to [www.hse.ie/coronavirus](http://www.hse.ie/coronavirus)





Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

An tSeirbhís Sláinte Chomhshaoil  
Feidhmeannacht na Seirbhíse Sláinte (Iarthar)  
Ceanncheathrú Naomh Muire  
Caisleán an Bharraigh  
Contae Mhaigh Eo

Environmental Health Service  
HSE West  
St. Mary's Headquarters  
Castlebar  
Co. Mayo

☎ (094) 90 42260 / 90 42105  
📠 (094) 90 27312

**Date:** 4 April 2022

**Name:** Mr David Clarke, ABO Wind, Unit 3, Aspen Court, Cornelscourt,  
Dublin D18 TD56

**Re:** Scoping Report

**Proposed development:** Construction of a wind farm development at Keerglen, Co. Mayo  
and connection to existing electricity grid at Tawnaghmore  
substation

**Applicant:** ABO Wind Ireland Ltd

**EHIS Reference:** EHIS 2250

Dear Mr Clarke,

Please find enclosed HSE Consultation Report in relation to the above proposal.

The following HSE departments were made aware of the consultation request for the proposed development on 2 March 2022

- Emergency Planning - Kay Kennington
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher/ Helen Mulcahy
- CHO – Breda Crehan Roche

If you have any queries regarding this report the initial point of contact is Ms Maria Horkan, Principal Environmental Health Officer ([maria.horkan@hse.ie](mailto:maria.horkan@hse.ie)) who will refer your query to the appropriate person.

Yours sincerely

Maria Horkan  
Principal Environmental Health Officer



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### HSE EIA Scoping

#### Environmental Health Service Submission Report

**Date:** 4 April 2022

**Our reference:** EHIS 2250

**Report to:** Mr David Clarke, Junior Project Manager ABO Wind, Unit 3, Aspen Court, Cornelscourt, Dublin D18 K400

**Consultant's Reference:** Keerglen Windfarm, Co. Mayo

**Type of Consultation:** EIA Scoping

**Proposed development:** Proposed Keerglen Wind Farm, Ballycastle, Co. Mayo

**Applicant:** ABO Wind Ireland Ltd

**Proposed Development:** ABO Wind Ireland Ltd intends to apply for planning permission to Mayo County Council for

- The construction of 10 No. wind turbines located approximately 5.5km to the south of Ballycastle and 15km north of Crossmolina, Co. Mayo. The turbines will have an overall ground to blade tip height of 185m.
- 1 No. permanent Met Mast
- 1 No. 38kV electrical substation
- Hardstandings/crane pads at each turbine
- Underground cabling required to connect the on-site substation to each of the wind turbines
- Connection to the national electricity grid at the existing 38/110kV Tawnaghmore substation in the townland of Tawnaghmore Upper, Co. Mayo
- Upgrading of existing site access tracks and construction of new site access tracks as required
- A temporary site compound and all associated works and
- All associated infrastructure and site development works

#### General Introduction

The following documents should be taken into consideration when preparing the Environmental Impact Assessment Report:

- Guidelines on the information to be contained in EIS (2002), 187kb
- Advice Notes on Current Practice in the preparation of EIS (2003), 435kb
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment

## Appendix 2.2

### Keerglen Wind Farm Environmental Impact Assessment Report

[https://www.housing.gov.ie/sites/default/files/publications/files/guidelines\\_for\\_planning\\_authorities\\_and\\_an\\_bord\\_pleanála\\_on\\_carrying\\_out\\_eia\\_-\\_august\\_2018.pdf](https://www.housing.gov.ie/sites/default/files/publications/files/guidelines_for_planning_authorities_and_an_bord_pleanála_on_carrying_out_eia_-_august_2018.pdf)

EU publication: Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report, EU, 2017

[http://ec.europa.eu/environment/eia/pdf/EIA\\_guidance\\_EIA\\_report\\_final.pdf](http://ec.europa.eu/environment/eia/pdf/EIA_guidance_EIA_report_final.pdf)

Adoption of the Directive (2014/52/EU) in April 2014 initiated a review of the above guidelines. The draft new guidelines can be seen at:

<http://www.epa.ie/pubs/consultation/reviewofdraftguidelinesadvisenotes>

The applicant should also consider the findings of the High Court judgement issued in the judicial review of the Derryadd Wind Farm. (2021 IEHC 390 [2020] No. 557 JR] P. Sweetman v An Bord Pleanála)

Generally the Environmental Impact Assessment should examine all likely significant impacts and provide the following information for each:

- a) Description of the receiving environment;
- b) The nature and scale of the impact;
- c) An assessment of the significance of the impact;
- d) Proposed mitigation measures;
- e) Residual impacts.

Directive 2014/52/EU has an enhanced requirement to assess likely significant impacts on Population and Human Health. It is the experience of the Environmental Health Service (EHS) that impacts on human health are often inadequately assessed in EIAs in Ireland. It is recommended that the wider determinants of health and wellbeing are considered in a proportionate manner when considering the EIA. Guidance on wider determinants of health can be found at [www.publichealth.ie](http://www.publichealth.ie)

In addition to any likely significant negative impacts from the proposed development any positive likely significant impacts should also be assessed.

The HSE will consider the final EIAR accompanying the planning application and will make comments to Mayo County Council on the methodology used for assessing the likely significant impacts and the evaluation criteria used in assessing the significance of the impact.

This report only comments on Environmental Health Impacts of the proposed development. It is based on an assessment of the correspondence submitted to this office dated 8 February 2022.

The Environmental Health Service (EHS) recommends that the following matters are included and assessed in the EIAR

- Public Consultation

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- Decommissioning phase
- Siting and location of turbines
- Opportunity for Health Gain
- Noise & Vibration
- Shadow Flicker
- Air Quality
- Surface and Groundwater Quality
- Geological Impacts
- Ancillary facilities
- Cumulative impacts

#### Public Consultation

It is strongly recommended that early and meaningful public consultation with the local community should be carried out to ensure all potentially significant impacts have been adequately addressed. It is noted that the proposed location of the wind farm development is rural and sparsely populated. The EHS regards it as of critical importance that all local residents are consulted and invited to engage in the development process. The EIAR should indicate how consultation was undertaken with the occupants of properties in the vicinity of the proposed development.

All parties affected by the proposed development, including those who may benefit financially from the project, must be fully informed of what the proposal entails, especially with regard to potential impacts on surrounding areas.

Sensitive receptors and other stakeholders should be identified to ensure all necessary and appropriate mitigation measures are put in place to avoid any complaints about the proposed wind farm development in the future.

It is acknowledged that restrictions around public gatherings as a result of Covid 19 prevention measures have impacted on opportunities for public consultation events during the last two years and may continue to impact on such events in the early part of 2022. However it is expected that meaningful public consultation, where the local community is fully informed of the proposed development, will be undertaken. Members of the public should be given sufficient opportunities to express their views on the proposal wind farm.

The Environmental Impact Assessment Report (EIAR) should clearly demonstrate the link between public consultations and how those consultations have influenced the decision-making process in the EIA.



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To assist with the consultation and planning process it is recommended that the applicant develops a dedicated website for the proposed wind energy project. All correspondence, maps, project updates and documentation including the EIAR should be uploaded to this site

#### **Decommissioning Phase**

The proposed operational lifetime of the wind farm should be indicated in the EIAR.

The EIAR should detail what the eventual fate of the turbines and associated material will be, i.e. will the material be recycled or how will it be disposed of.

Information should also be provided regarding the proposed methodology to be used for the disposal of the materials forming the foundations of the wind turbines.

The EIAR should indicate the proposed future use of the wind farm site at the end of the planning permission period.

#### **Siting, Location and details of Turbines**

The EIAR should include a map and a description of the proposed location of each of the proposed wind turbines within the 198 hectare site.

The Environmental Health Service expects that details (height and model) of the turbines to be installed will be available at the time planning permission is sought and will be included in the EIAR.

Details of turbine foundation structures, including depth, quantity and material to be used should be included in the EIAR.

#### **Opportunity for Health Gain**

The EPA has issued guidance with regard to meeting the requirements of Directive 2014/52/EU which assesses the impact of certain public and private projects on the environment. The proposed development should be assessed with a view to the potential to include opportunities for health gain within the site of the proposed wind farm by including greenways, cycle-paths or walking trails within the development site.

#### **Assessment of Consideration of Alternatives**

The EIAR should consider an assessment of alternatives. It is noted that 'Alternatives Considered' will be assessed in Chapter 2 of the EIAR. The EHS recommends that alternative renewable energy options to onshore wind farms should be assessed as part of the EIAR.

#### **Noise & Vibration**

The potential impacts for noise and vibration from the proposed development on all noise sensitive locations must be clearly identified in the EIAR. Impacts during both the proposed construction phase and the operational phase should be addressed. The EIAR must also consider the appropriateness and effectiveness of all proposed mitigation measures to minimise noise and vibration.

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A baseline noise monitoring survey should be undertaken to establish the existing background noise levels. Noise from any existing turbines in the area should not be included as part of the background levels.

In addition, an assessment of the predicted noise impacts during the construction phase and the operational phase of the proposed wind farm development must be undertaken which details the change in the noise environment resulting from the proposed wind farm development.

The Draft Revised Wind Energy Development Guidelines were published in December 2019. Whilst these have yet to be adopted, any proposed wind farm development should have consideration of the draft Guidelines.

[https://www.housing.gov.ie/sites/default/files/public-consultation/files/draft\\_revised\\_wind\\_energy\\_development\\_guidelines\\_december\\_2019.pdf](https://www.housing.gov.ie/sites/default/files/public-consultation/files/draft_revised_wind_energy_development_guidelines_december_2019.pdf)

#### **Shadow Flicker**

It is recommended that a shadow flicker assessment is undertaken to identify any dwellings and sensitive receptors which may be impacted by shadow flicker. The assessment must include all proposed mitigation measures. Dwellings should include all occupied properties and any existing or proposed properties for which planning consent has been granted for construction or refurbishment.

It is recommended that turbine selection will be based on the most advanced available technology that permits shut down during times when residents are exposed to shadow flicker. As a result no dwelling should be exposed to shadow flicker.

#### **Air Quality**

Due to the nature of the proposed construction works generation of airborne dust has the potential to have significant impacts on sensitive receptors. A Construction Environmental Management Plan (CEMP) should be included in the EIAR which details dust control and mitigation measures. Measures should include:

- Sweeping of hard road surfaces
- Provision of a water bowser on site, regular spraying of haul roads
- Wheel washing facilities at site exit
- Restrict speed on site
- Provide covers to all delivery trucks to minimise dust generation
- Inspect and clean public roads in the vicinity if necessary
- Material stockpiling provided with adequate protection from the wind
- Dust monitoring at the site boundary
- Truck inspection and maintenance plan

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- Details of a road maintenance agreement between the wind farm operator and the Local Roads Authority to clarify responsibility for the upkeep and repair of access roads during the construction phase of the project.

#### **Surface and Ground Water Quality**

The proposed development has the potential to have a significant impact on the quality of both surface and ground water. All drinking water sources, both surface and ground water, must be identified. Public and Group Water Scheme sources and supplies should be identified. Measures to ensure that all sources and supplies are protected should be described. The Environmental Health Service recommends that a walk over survey of the site is undertaken in addition to a desktop analysis of Geological Survey of Ireland data in order to identify the location of private wells used for drinking water purposes.

Any potential significant impacts to drinking water sources should be assessed. Details of bedrock, overburden, vulnerability, groundwater flows, aquifers and catchment areas should be considered when assessing potential impacts and any proposed mitigation measures.

#### **Geological Impacts**

A detailed assessment of the current ground stability of the site for the proposed wind farm extension and all proposed mitigation measures should be detailed in the EIAR. The assessment should include the impact construction work may have on the future stability of ground conditions, taking into consideration extreme weather events, site drainage and the potential for soil erosion.

Reference is made to a peat slide which occurred near Ballybofey in Co. Donegal on November 13th 2020 which may have been linked to construction activity at Meenbog Wind Farm. Potential impacts on water supply associated with contamination following a peat slide include sedimentation and alteration of pH levels.

The Environmental Health Service recommends that a detailed Peat Stability Assessment should be undertaken to assess the suitability of the soil for the proposed development. The EIAR should include provision for a peat stability monitoring programme to identify early signs of potential bog slides ('pre-failure indicators' see the Scottish Government's 'Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Developments 2017)

<https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2017/04/peat-landslide-hazard-risk-assessments-best-practice-guide-proposed-electricity/documents/00517176-pdf/00517176-pdf/govscot%3Adocument/00517176.pdf>

#### **Ancillary Facilities**

The EIAR should include details of the location of all site office, construction compound, fuel storage depot, sanitary accommodation and canteen, First Aid facilities, disposal of wastewater and the provision of a potable water supply to the site canteen.



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#### Cumulative Impacts

Table 3.2: 'Wind Farms within 20km of the Development' of the Scoping Report indicates that there are a number of existing and proposed wind farms within the vicinity of the proposed development. All existing or proposed wind farm developments in the vicinity should be clearly identified in the EIAR.

The impact on sensitive receptors of the proposed development combined with other wind farm developments in the vicinity should be considered. The EIAR should include a detailed assessment of any likely significant cumulative impacts of the proposed renewable energy development.

The EIAR should state clearly if there is any future proposal to further extend the proposed Keerglen Wind Farm.



Evelyn Keane  
Environmental Health Officer  
HSE West  
St. Mary's HQ,  
Old Westport Road,  
Castlebar,  
Mayo.



Environmental Health Officer  
Environment OU  
Ennistymon Health Centre  
Ennistymon  
Co. Clare

**Department of Housing, Local Government and Heritage**

Our Ref: G Pre00025/2022 (Please quote in all related correspondence)

A Chara

I acknowledge receipt of your recent consultation.

In the event of observations, you will receive a co-ordinated heritage-related response by email from Development Applications Unit (DAU).

The normal target turnaround for pre-planning and other general consultations is six weeks from date of receipt. In relation to general consultations from public bodies under the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 to 2011, the Department endeavours to meet deadline dates, where requested.

If you have not heard from DAU and wish to receive an update, please email [manager.dau@housing.gov.ie](mailto:manager.dau@housing.gov.ie).

Regards

Diarmuid

**Diarmuid Buttimer**

*Executive Officer*

**An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta**

**Department of Housing, Local Government and Heritage**

**Aonad na nIarratas ar Fhorbairt**

*Development Applications Unit*

**Oifigí an Rialtais**

*Government Offices*

**Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90**

Newtown Road, Wexford, County Wexford, Y35 AP90

[Diarmuid.Buttimer@housing.gov.ie](mailto:Diarmuid.Buttimer@housing.gov.ie)

[Manager.DAU@housing.gov.ie](mailto:Manager.DAU@housing.gov.ie)

**From:** David Clarke <[David.Clarke@abo-wind.com](mailto:David.Clarke@abo-wind.com)>

**Sent:** Tuesday 8 February 2022 13:26

**Subject:** Consultation - Keerglen Wind Farm

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Dear Consultee,

ABO Wind Ireland Ltd. (ABO Wind) are seeking to develop a Wind Farm within the townlands of Keerglen, Co. Mayo.

Accordingly, we have commenced the Environmental Impact Assessment (EIA) process to support a forthcoming planning application that will be submitted to Mayo County Council. The proposed wind farm site is located circa 5.5 km to the south of Ballycastle and 15 km north of the village of Crossmolina, County Mayo.

Further details of the proposed project can be found in the attached Scoping Report. A Site Location Plan, Site Layout Plan and Grid Connection Route Drawing are also attached for your information.

We are consulting with you on this proposal as it may be of interest to you (or your organisation). While you will be presented with the opportunity to make a submission on the proposed development as part of the statutory planning process, we wanted to engage with you early in the process to make you aware of the emerging proposals and to provide you the opportunity to comment as necessary. If there are any key issues which you consider should be addressed during the preparation of the Environmental Impact Assessment Report (EIAR) we would welcome your input at this stage.

Should this consultation request be directed to another contact within your organisation we would be grateful if you could forward this information on to them, or respond to this email and provide us with the appropriate contact.

If you have any queries, or require any additional information, please do not hesitate to get in touch.

Kind regards,

David

David Clarke

Junior Project Manager

Unit 3, Aspen Court

Cornelscourt

Dublin

Appendix 2.2  
Keerglen Wind Farm Environmental Impact Assessment Report  
D18 K400  
[David.Clarke@abo-wind.com](mailto:David.Clarke@abo-wind.com)  
Phone: +353 (0)1 289 08 45  
Mobile: +353 (0)86 2363564

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RE: Consultation - Keerglen Wind Farm

Housing Manager DAU <Manager.DAU@housing.gov.ie>  
To: David Clarke  
Follow up. Start by Monday 15 May 2023. Due by Monday 15 May 2023.

Our Ref: G Pre00025/2022 (Please quote in all related correspondence)

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Regards  
Diarmuid

Diarmuid Buttner  
Executive Officer  
An Baine Tibheochta, Rialtaíocht agus Oidhreacht  
Department of Housing, Local Government and Heritage  
Aonad na nIarratas ar Fhorbairt  
Development Applications Unit  
Oifig an Rialtais  
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Bóthar an Bhailí Nua, Loch Garman, Contae Loch Garman, Y35 AP90  
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[Manager.DAU@housing.gov.ie](mailto:Manager.DAU@housing.gov.ie)

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If you have any queries, or require any additional information, please do not hesitate to get in touch.

Kind regards,  
David  
David Clarke  
Junior Project Manager