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2.0 Alternatives, Scoping and Consultation

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Mayo Planning Authority - Inspection Purposes Only

2.1 Introduction

The section of the EIAR outlines the wide range of practices and procedures used to help facilitate the responsible and sustainable development of Keerglen Wind farm. The section has been prepared by ABO Energy Ireland Ltd. and been largely informed and guided by the:

- 'Guidelines on The Information to be Contained in Environmental Impact Assessment Reports' (Environmental Protection Agency, 2022),
- Environmental Impact Assessment of Projects - *Guidance on the preparation of the Environmental Impact Assessment Report* (European Union, 2017);
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Department of Housing, Planning and Local Government, 2018)
- DoHPLG (2019) *Draft Revised Wind Energy Development Guidelines* (hereafter referred to as DWEDG);
- DCCAE (2016) *Code of Practice for Wind Energy Development in Ireland: Guidelines for Community Engagement*;
- IWEA (2018) *Community Engagement – Partnership and Progress*

One key development in the DWEDGs, is the requirement for developers to have early and constructive consultation with communities on proposed wind farm developments before a planning application is made. In this regard, a Community Report is required to be submitted with a planning application, outlining how the final proposal was shaped in response to those consultations. The Community Report is included in Appendix 2.3.

2.2 Alternatives

The EU Guidance Document (EU, 2017) on the preparation of EIAR outlines the requirements of the EIA Directive and states that, in order to address the assessment of reasonable alternatives, the Developer needs to provide the following:

- A description of the reasonable alternatives studied; and
- An indication of the main reasons for selecting the chosen option with regards to their environmental impacts.

Article 5(1) of the Revised EIA Directive details the requirements for the approach to the consideration of alternatives, stating:

“Where an environmental impact assessment is required, the developer shall prepare and submit an environmental impact assessment report. The information to be provided by the developer shall include at least: ... (d) a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment”

Annex IV of the Revised EIA Directive (Information Referred to in Article 5(1) (Information for the Environmental Impact Assessment Report) states that:

“A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant for the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of environmental effects”.

The Guidelines on the information to be contained in Environmental Impact Assessment Reports, EPA, 2022, state that *“It is generally sufficient to provide a broad description of each main alternative and the key issues associated with each, showing how environmental considerations were taken into account in deciding on the selected option”.*

The consideration of the various reasonable alternatives investigated is an important requirement of the EIA process. The objective being that the developer to presents a range of feasible alternatives considered which could achieve the project objectives. It is generally sufficient to provide a broad description of each main alternative and the key issues associated with each, showing how environmental considerations were taken into account in deciding on the selected option.

In an effective EIA process, different types of alternatives may be considered at several key stages during the process. As environmental issues and various constraints emerge during the preparation of the EIAR,

alternative designs may need to be considered early in the process or alternative mitigation options may need to be considered towards the end of the process. This section of the EIAR provides an outline of the main alternatives examined throughout the design and consultation process. It provides an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects. The type of alternatives depends on the nature of the project proposed and the characteristics of the receiving environment.

Taking consideration of the legislation and guidance requirements into account, this chapter addresses alternatives under the following headings:

- The 'Do Nothing' scenario;
- Alternative Locations;
- Alternative Windfarm Layout and Design;
- Alternative Turbine Scale;
- Alternative Underground Electricity Export Connection Options;
- Alternative Turbine Delivery Route;
- Alternative Site Access;
- Alternative Sources of Energy;
- Alternative Land Use; and
- Alternative Mitigation Measures

2.2.1 The 'Do-Nothing' Scenario

The starting point for EIA is an assessment of the current state of the environment and how this is likely to evolve without the proposed development being realised. This is referred to as the 'do-nothing' scenario:

"The do-nothing alternative is a general description of the evolution of the key environmental factors of the site and environs if the proposed project did not proceed" (EPA, 2022)

Therefore, in a 'do-nothing' scenario, Keerglen Wind farm would not be constructed, and the site and surrounding environment would remain unchanged. Accordingly, the positive and negative environmental impacts identified throughout this EIAR would not occur.

In such a scenario, the land use of the Site would remain as primarily peat land and the environmental effects would be neutral. However, the opportunity to capture a significant part of the country's renewable energy resource would be lost, as would the opportunity to contribute to meeting Government and EU targets for the production and consumption of electricity from renewable resources and the reduction of greenhouse gas emissions. Moreover, the opportunity to generate developer contributions and community benefits from the proposed development would be lost along with local employment, investment opportunities and subsequent benefits to the local economy.

Table 2.1 Comparison Environmental Effects of the Do-Nothing Scenario versus the Chosen Option	
Environmental Consideration	Do Nothing Scenario
Population and Human Health	No increase in local employment and no long-term financial contributions towards the local community.
Biodiversity & Ornithology	No habitat loss. No potential for construction/operational phase impacts.
Land, Soils and Geology	No excavation of large volumes of peat and spoil. No potential for construction phase impacts.
Geotechnical / Peat Stability	No potential for construction phase impacts.
Water (Hydrology & Hydrogeology)	No potential for construction phase impacts.
Air & Climate	Will not assist in achieving the renewable energy targets set out in the Climate Action Plan. Missed opportunity for a reduction in greenhouse gas emissions and overall improvement in air quality.
Noise & Vibration	No potential for construction/operation phase impacts on nearby sensitive receptors.
Landscape & Visual Impact	Existing landscape and visual amenity in the area will remain unchanged.
Cultural Heritage & Archaeology	No potential for impacts on unrecorded, subsurface Archaeology.
Material Assets	No potential for construction phase impacts such as volumes of construction traffic over a short duration of time.

2.2.2 Alternative Locations

Some locations have more inherent environmental issues than others for wind energy developments. Such sites can usually be avoided in favour of alternative sites that have fewer constraints and adequate capacity to accommodate a wind farm.

ABO Energy Ireland Ltd. has carried out extensive site finding exercises in County Mayo and the surrounding areas in order to identify suitable sites for wind energy development. Ideally any site which is identified should be in an area with a suitable wind resource and have the capability of being successfully planned and developed when site specific constraints and key spatial planning datasets such as forestry data, ordnance survey land data, house location data, transport, existing wind energy and grid infrastructure data and environmental data such as ecological designations, landscape designations and wind energy strategy designations available at the time are taken into account. This section sets out the main reasons

for choosing the proposed development site and outlines reasons for excluding others that were under consideration.

An ordered approach to site finding involved a *sieve mapping analysis* of the receiving environment where potential constraints associated with an area were identified. Constraints can include the following:

- County Development Plan Policies (Renewable or Wind Energy Strategy & Policies etc);
- Established and Future Land Use;
- Underground Electricity Export Connection;
- Grid Capacity (it was necessary to consider the potential for Underground Electricity Export Connection, including in terms of distance to potential connection nodes, in the local area, to accommodate a connection to the national grid);
- Residential Amenity (Set Back);
- Wind Speed (Lands where the average wind speed at 80 metres above ground level is less than 7 m/s and, therefore, potentially not suitable for a commercially viable wind energy development were also discounted at this stage);
- Environmental Designations (SPA, SAC, NHA, pNHA)
- Archaeology and Built Heritage;
- Landscape Sensitivity
- Accessibility / Supporting transport Infrastructure

The constraints were applied using ArcGIS¹ which identified general areas of potential. A more focused review of a chosen area was then carried out using satellite imagery, Google Street View and Land Registry Folios. Several site visits were also carried out to get an understanding of the '*ground truth survey*' to observe any unforeseen constraints or information which the above-mentioned resources may not have flagged.

When constraints are applied, there are a limited number of sites in County Mayo and the surrounding areas which are not constrained by environmental designation (National Parks, Natura 2000 and Nationally Designated Sites (SAC, SPA, NHA, pNHA)) or visual amenity and which are considered to have suitable wind speeds. Access to land is a particular issue for wind farm development due to the large and dispersed nature of the land required to construct a wind farm. Furthermore, it is often challenging to ensure that all of the necessary landowners agree to the wind energy development and provide their authorisation that such development can proceed on lands within their legal ownership.

¹ ArcGIS is a geographic information system (GIS) for working with maps and geographic information. It is used for: creating and using maps; compiling geographic data; analysing mapped information; sharing and discovering geographic information; using maps and geographic information in a range of applications; and managing geographic information in a database.

Having regard to all of the above, a number of alternative sites were assessed before deciding to proceed with the Keerglen Wind farm Site. Preliminary site finding activity identified potentially suitable sites that were later found to be located within areas '*unsuitable for further development*' for wind energy development as outlined in the in the Mayo County Council's adopted Renewable Energy Strategy. Accordingly, having regard to the regional and local planning policy context, these sites were omitted from any further consideration.

As a result of the above, the site finding exercise narrowed to the consideration of four potentially suitable sites:

Ballywalter, Co. Mayo

The site screening process showed that the Ballywalter site, which is located approximately 6km south of Ballinrobe, benefits from a strong wind resource, favourable "*Tier 2 Open for Consideration*" zoning in local planning policy and is not constrained by any environmental designations.

However, following a comprehensive planning review of the site it was ultimately discounted for the following reasons:

- Difficulties were encountered achieving sufficient setbacks from residences from the prospective site. This was as a result of new dwellings being built in close proximity to the prospective site.
- Having regard to the residential properties in close proximity, it was not considered feasible to pursue for a wind energy development.

Moneynieran Co. Mayo

This particular prospective site is located near Bellacorrick in Mayo in an area that is "*Open for Consideration*" for wind energy development in a planning policy context. Good wind resources were present in this location, and residential amenity could be respected as the Site had the capability of accommodating a prospective wind farm layout that would achieve good setback distances to residential receptors. The Site is not constrained by environmental designations and had the potential of achieving in excess of 50MW. It borders an existing windfarm and is located in close proximity to another large wind farm. However, this ultimately resulted in the Site being discounted as:

- It was determined that the Site in conjunction with the existing neighbouring large wind farms (circa 700m north and 3km east of the Site) did not have the cumulative capacity to absorb a further wind energy development. Furthermore, another wind farm development in close proximity went into planning at this time. It was considered that the potential cumulative impact from a new wind farm on the Site could give rise to potentially significant environmental impacts.
- Having regard to the potential cumulative impacts, the Site was not considered feasible to pursue for a wind energy development

Cloonyvollow, Co. Mayo

This Site is located in an area designated as “Open for Consideration” as outlined in the Wind Energy Development Strategy contained within the Mayo County Development Plan. The Site was considered to have a good wind resource with the Sustainable Energy Authority of Ireland (SEAI) Wind Speed Atlas identifying it as having a wind speed of between 8 m/s and 9 m/s at 100m above ground level. The particular location does not have any environmental designations and is surrounded by agricultural land uses, which are compatible with the development of a wind farm. The Site was considered as a suitable candidate for a wind energy development. However, the site was ultimately discounted from consideration following review of the Land Registry Folios as it was discovered that another developer had a legal interest in the Site.

Keerglen, Co. Mayo

With a good wind resource, appropriate established and future land use, distance from residential dwellings, proximity to environmental conservation and natural heritage designations, ease of access, and proximity to the national grid, the site at Keerglen was deemed suitable for a wind energy development and as such is the subject of this EIAR. A summary of the key findings outlining the suitability of the Site are discussed below at Sections 2.2.2.1 – 2.2.2.11.

2.2.2.1 Planning Policy

County Development Plan / Wind Energy Strategy

The proposed development is located within the functional area of Mayo County Council. The current Mayo County Development Plan 2022-2028 (the CDP) was formally adopted by Local Members at a special meeting in June 2022, coming into effect on the 10th of August 2022.

The policies and objectives set out within the CDP have maintained strong linkages with the key aims and themes set out within the previous development plan. It sets out the strategic framework for sustainable and planned economic and social development in the county. The plan strongly emphasises the urgent and pressing issue of climate change and the impacts it will have on County Mayo and its people. It underlines the critical need to phase out fossil fuels and provide safe, secure and renewable electricity supply to enable sustainable economic growth.

The CDP links the economic growth of both Ireland and Mayo is to the provision of secure energy supply and commits that Co. Mayo will endeavour to play its part in promoting more sustainable renewable electricity generation. The CDP notes that Co. Mayo's current contribution to renewable energy includes 266 MW (Q1 2020) of wind energy generated from 15 wind farms, which is approximately 6% of Ireland's overall wind energy production. It highlights that the development of the extant permissions for wind projects (such as the proposed wind farm site) in the county will significantly add to Mayo's renewable energy output.

The climate action objectives include a commitment to facilitating the “*development and exploitation of all appropriate renewable energy sources at suitable locations within the county, where such development does not have a negative impact on the surrounding environment (including water quality), landscape,*

biodiversity or local amenities". This underlines the commitment of the new plan to addressing climate change.

The need for continued support / investment within renewable energy generation as part of the county's broader decarbonisation strategy is captured within the CDP's Renewable Energy Chapter.

The Mayo Renewable Energy Strategy (RES) 2011-2022 (the current renewable energy strategy for the county) outlines the renewable energy potential for County Mayo and how the county can capitalize these resources and meet energy targets. It acknowledges the benefits renewable energy can deliver for the county including providing a more secure energy supply, reducing reliance on fossil fuels and enabling future energy export. The strategy identifies areas most suitable for renewable energy developments in a tier system.

The definitions of the on-shore wind energy classifications, as per the Mayo Renewable Energy Strategy 2011-2020 are outlined below –

- **Priority Areas** are areas which have secured planning permission and where on shore wind farms can be developed immediately.
- **Tier 1 – Preferred (Large Wind Farms)** are areas in which the potential for large wind farms is greatest.
- **Tier 1 – Preferred (Cluster of Turbines)** are areas identified as being most suitable for smaller clusters of wind turbines (clusters of up to three to five turbines depending on site conditions and visual amenity).
- **Tier 2 – Open for Consideration** identifies areas which may be considered for wind farms or small clusters of wind turbines but where the visual impact on sensitive or vulnerable landscapes, listed highly scenic routes, scenic routes, scenic viewing points and scenic routes will be the principal consideration. The Tier 2 classification will be reviewed by the Council following a determination by EirGrid of grid infrastructure for the County.



Figure 2.1: Map 1 of the current Wind Energy Strategy identifying Wind Energy Policy Areas.

(Source: Renewable Energy Strategy 2011-2020, Mayo County Council)

The majority of the Keerglen Site is located in an area designated as 'Tier 1 - Preferred'. Other than this the site is located in 'Tier 2 – Open for consideration'. The proposed development has been designed without significant adverse impacts to environmental amenities and sensitivities, and therefore, is deemed a sustainable form of development which is in accordance with planning policy at a Local, Regional, National and International level. The documentation which accompany the planning application, including the EIAR, NIS and all supporting documentation demonstrate how the development of Keerglen Wind Farm can occur without significant adverse effects on the receiving environment.

2.2.2.2 Established and Future Land Use

The chosen site must be of sufficient size to accommodate a wind energy development that is commercially viable. A large site is required for the siting of wind turbines while also ensuring that sufficient separation is accounted for between each turbine to allow the successful operation of the development (i.e. the operation of one of the turbines will not interfere aerodynamically with the wind take of one of the adjacent turbines).

The development of wind energy is not acceptable in areas with certain land uses. Lands which have been zoned for other uses, such as residential, commercial and industrial were excluded from the study. This resulted in areas that are predominantly built up being excluded from the site finding exercise. When further land-uses were examined, typically, lands in agriculture or forestry were considered the most appropriate. These lands further offer the benefit of multifunctional use as wind energy development in principle is compatible with both agricultural and forestry operations.

The Keerglen Wind Farm Site is situated in a small upland valley of moorland and forestry, opening to low rural/pastoral landscape with higher population to the east. The site is contained within the Nephin ridge complex but at its dissipating eastern end. In terms of land use, the Site generally comprises of peat bogland and low value agricultural grassland. In this regard the Site offers the opportunity of a multifunctional land use comprising a wind farm, agricultural operations and turf cutting.

2.2.2.3 Grid Capacity / Underground Electricity Export Connection

An element of the site finding exercise included an assessment of grid capacity and potential underground electricity export connection points. This provided an understanding of the potential for the electricity generated by the proposed development to be exported to a commercially viable location. Proximity to a suitable national grid substation or Large Energy User (LEU) is important in this regard as this will be a fundamental determinant in ensuring that such projects are viable and thus able to contribute to the wider governmental objectives of reducing our carbon footprint and achieving 80% renewable electricity by 2030. The Keerglen Wind Farm site is located approximately 22.8km from the Tawnaghmore 38kV/110kV substation. The Tawnaghmore substation is located within the confines of Killala business park which has the potential to host a selection of LEUs (i.e. one Data Centre received planning permission in 2017, planning reg. ref. 16694). Accordingly, Tawnaghmore substation and the lands at Killala business park have been identified as viable connection points to facilitate the development of this wind energy project.

During the process of selecting an appropriate location for the proposed Keerglen Wind Farm to connect to, Bellacorick 38kV/110kV substation was also considered as a possible option. However, upon a detailed review, Tawnaghmore substation and the lands at Killala business park were chosen as the preferred options as they are closer to the Site, thus having less of an environmental impact as a result of the construction of a future underground electricity export connection route.

2.2.2.4 Residential Amenity (Set Back)

The proximity to residential dwellings is a significant factor in site selection to ensure that residential amenity is not adversely impacted by the proposed development. A setback distance of four times the maximum tip height ($4 \times 180\text{m} = 720\text{m}$) of a wind turbine from residential properties was applied. Areas not capable of achieving an appropriate set back were excluded from the study. The site at Keerglen achieves the required 720m set back distance to all uninvolved residential properties.

2.2.2.5 Wind Speed

The wind resource is an important consideration when selecting a candidate site for a wind energy development. In general, larger turbines are considered viable where the average wind speed is greater than 7m/s at 100m above ground level.

The Irish Wind Atlas produced by the SEAI illustrates average wind speeds for Ireland. In the context of the Keerglen Wind Farm Site, the Wind Atlas identifies the Site as having a wind speed of 8.5m/s at 100m above

ground level. These wind speeds are deemed to be viable for this site having regard to the other economic considerations associated with the wind energy development.

2.2.2.6 Environmental Designations

There are no Natura 2000 or nationally designated sites located within the Keerglen site boundary. The proposed wind farm site is not located within any area designated for ecological protection i.e. there are no sites designated under the EU Habitats Directive (SACs), EU Birds Directive (SPAs), National Heritage Area's (NHA) or pNHAs in the boundary of the proposed wind farm site.

The Keerglen site is fringed to the west by the Ummerantarry Bog Natural Heritage Area (NHA) (001570), a nationally designated peatland site. This is designated for the presence of relatively intact upland blanket bog and wet heath habitats. A number of Natura 2000 sites, both Special Areas of Conservation (SAC) and Special Protected Area (SPA), are present within the wider landscape. The most proximal SAC is the Glenamoy Bog Complex SAC (0500), at a distance of approx. 615m at the closest point (as the crow flies). The next most proximal Natura 2000 site is the Bellacorick Bog Complex SAC (1922) located approx. 3.3km south of the proposed development site.

2.2.2.7 Archaeology and Built Heritage

No National Monuments, Recorded Monuments, Protected Structures or items listed in the NIAH are located within the proposed wind farm site. Given the bogland nature of the proposed wind farm site the potential exists for sub-surface features and deposits to exist therein. However, through the employment of appropriate mitigation measures such considerations can be given due regard during the planning and development of the project.

2.2.2.8 Landscape Sensitivity

The Mayo County Development Plan 2022-2028 features a Landscape Appraisal rather than a Landscape Assessment; however, with regard to identifying the county's different landscape character areas, the two are functionally similar.

The site is *located* within Area E: North Mayo Mountain Moorland, and described as “*the mountainous spine of northern Mayo oriented in a crescent from the northern coast before diverging west toward Achill, and east toward Lough Conn, ending at this point with Nephin Beg. This mountain range is a focal point for northern Mayo and shares boundaries with 7 other landscape character units, which indicates its physical extent and landscape dividing role. It can be characterised as a barren montaine, moorland with steep flowing slopes...*” The section in which the site is located is the (relatively) coastal, north-eastern point of the crescent from the northern coast.

The Landscape Appraisal define landscape protection policy areas and a sensitivity matrix and land use types. The proposed development site is located within Landscape Policy Area 3 – Uplands, moors, heath

or bogs, with the description of “*distinctive and vast areas of the County form a single policy unit due to the similar visual characteristics of smooth topography, limited shelter vegetation, often steep slopes and prominent ridge lines, rendering this policy unit similar suitability to absorb development.*”

2.2.2.9 Accessibility / Supporting transport Infrastructure

Terrain, topography and the presence of existing transport infrastructure have the potential to impact the feasibility of a site for a wind energy development. The transport infrastructure in the surrounding area is deemed to be sufficient to accommodate the proposed Keerglen Wind farm. In terms of the surrounding road network the site is bounded by a number of regional, local roads and local laneways. The nearest major route to the site is the R315 situated east of the proposal site with the turn off from the R315 incorporating works as part of this planning application to cater for access into the local roadway, L51723.

This main construction and operations entrance to the site on the L51723 will facilitate material deliveries to the site (stone, steel, and concrete) and staff access, as well as large oversize components such as turbine blades, tower sections and substation components.

The proposed site entrance on the L51723 will also be used for the operational phase, facilitating occasional site maintenance vehicles. Additionally, internal access roads will be constructed as part of the initial phase of the construction of the wind farm.

2.2.2.10 Summary of Site Screening

The purpose of the site finding exercise was to identify a site that could feasibly accommodate a wind farm development while minimising the potential for adverse impacts on the surrounding environment. Following consideration of each of the above constraints, the Keerglen site was identified as a suitable for the provision of a wind farm. The Keerglen Wind Farm site is located on an existing land use which is predominantly used for extracting peat and as low value agricultural land. In this regard the site offers the opportunity of a multifunctional land use comprising a wind farm, peat extraction and agricultural operations. In terms of access, the existing land uses allows the site to take advantage of existing access roads. The site is not located within any area designated for environmental protection and has the capability of complying with the Mayo County Development Plan 2022 – 2028 (as varied), the Mayo Renewable Energy Strategy (including the Mayo Wind Energy Strategy) and all relevant national wind energy guidelines.

Following consideration of each of the above constraints, the Keerglen site was identified as a suitable for the provision of a wind farm. The Site is not located within any area designated for environmental protection and has the capability of complying with the Mayo County Council's County Development Plan 2022 – 2028, Mayo County Council's Renewable Energy Strategy (including the Mayo Wind Energy Strategy) and accompanying relevant national, regional wind energy guidelines.

2.2.3 Alternative Windfarm Layout and Design

Throughout the preparation of this EIAR, the layout and design of Keerglen Wind farm has evolved through a collaborate and iterative process with a multidisciplinary design team made up of planners, engineers, ecologists, archaeologists, landscape architects and other environmental specialists. Informed by site surveys and specialist technical studies the layout and design of the proposed development has been revised to respond to the key findings obtained from these surveys and studies. Moreover, responses received through the consultation process have also helped inform the design evolution of the windfarm, from conception through to the final layout and design.

Initial baseline/desktop studies were undertaken at the start of the development process to inform the site layout. All studies were undertaken by the environmental, planning and engineering professionals that make up the Keerglen Wind farm Design Team, as outlined in Table 1.4 of the EIAR. Once these baseline studies were completed, potential environmental issues were identified and evaluated, with these used to form the basis for the analysis and mapping of environmental constraints.

2.2.3.1 Constraint Mapping and the Developable Area

The constraints mapping, design and layout of the proposed development follows the guidelines and recommendations outlined in the, *the Wind Energy Development Guidelines* (2006), *The Draft Wind Energy Development Planning Guidelines* (2019), *the IWEA Best Practice Guidelines for Irish Wind Energy Industry* (2008) and *the Mayo County Development Plan 2022 – 2028 (as varied)*.

Constraints mapping involves the identification and placing of buffers around different types of constraints. Through this, the potential developable area of the site can be clearly defined. These design constraints can include:

- Ecological Designations;
- Archaeological features;
- Streams and Watercourses;
- Telecommunication links;
- Residential Dwellings (separation distances);
- Landowner boundaries;
- Hydrogeology and Hydrology;
- Soils and Geology
- Landscape and visually sensitive areas;
- Topography & Buildability;
- Access (existing road network, County roads etc);

Having regard to the above, all sensitive environmental concerns have been considered through this iterative design process. Through this design process, the developable or buildable area for the main wind farm infrastructure components (turbines, access roads, substation, compound etc) is established i.e. it is confined to only the areas identified outside of the sensitive environmental buffer areas.

The screening of the subject site area for all sensitive environmental concerns and constraints allows for a viable area to be identified. An initial turbine layout is then developed to take account of all the constraints mentioned above and include all associated buffer zones and the separation distance required between the turbines. Following the mapping of all known constraints, detailed site investigations were carried out by the project team.

2.2.3.2 Evolution of Proposed Wind farm Layout

Collaboration amongst the multidisciplinary design team at the various stages of the projects assessment was critical to ensure that potential environmental impacts were minimised. As information regarding the proposed site was compiled and assessed by the design team, amendments to the layout, including to the number, location and size of turbines were made along the way. Other factors such as wind-take, noise, shadow flicker impacts and the separation distance to be maintained between turbines have also been considered throughout the layout design process. Accordingly, the final layout for Keerglen Wind farm has been informed by surveys and specialist technical studies, along with discussions with landowners, statutory consultees, stakeholders and the local community.

Within the developable area which emerged following the constraint's mapping analysis, 3 main alternative layout options were considered during the design stage.

Layout 1

The preliminary feasibility layout consisted of 14 no. turbines, maximising the available developable area within the site. A potential turbine blade tip height of 180m was used as a basis for the analysis as this represented the uppermost limit of the visual envelope considered potentially feasible for this site at the time. This initial layout was primarily developed on the basis of wind energy yield and turbine spacing within the land envelope available for the project. Identified constraints such as watercourses were also taken into account.

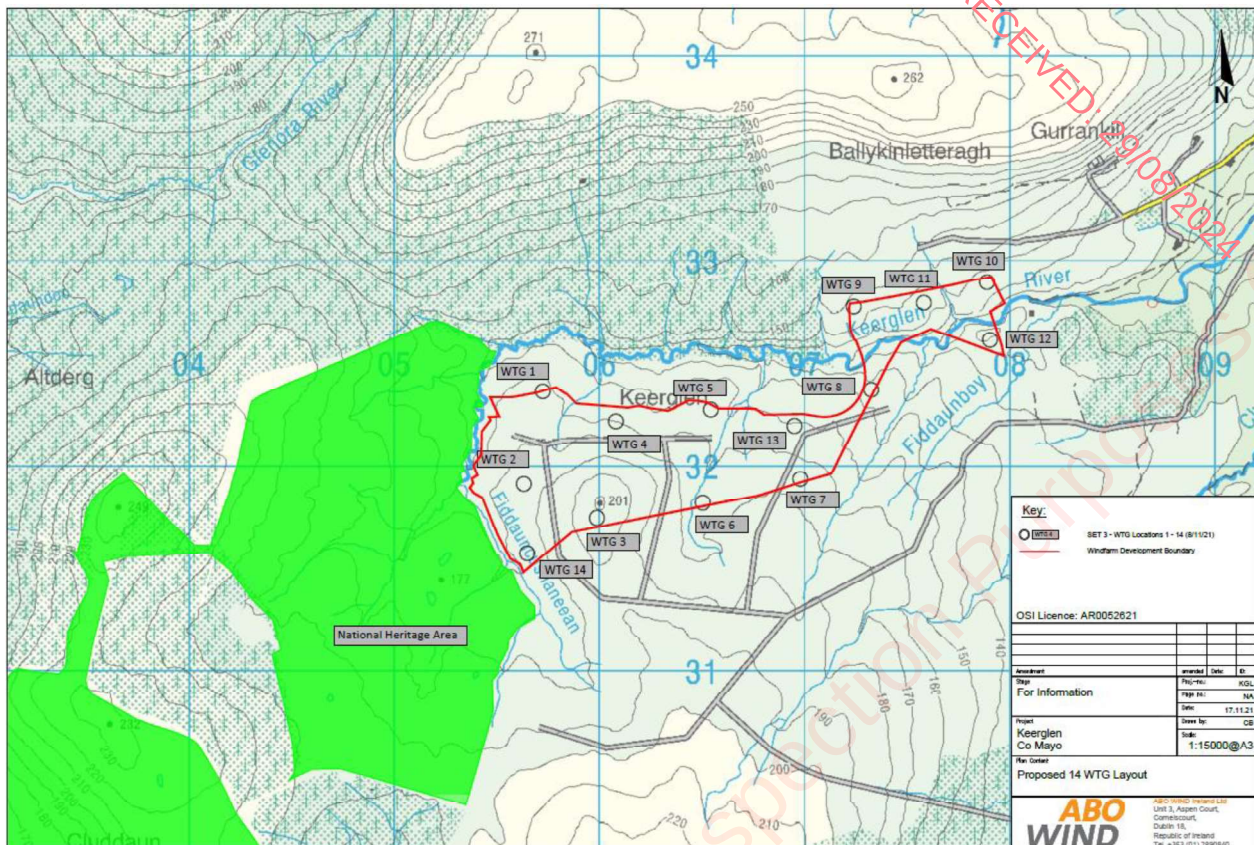


Figure 2.2: Preliminary Layout consisting of 14 no. Turbines

Layout 2

Upon further consideration of landscape and visual impacts associated with the initial turbine layout, the scale and design of that turbine arrangement was considered to be over-scaled in terms of the overall extent of the development. Thus, it was determined that a more refined layout be considered. The second iteration of the proposed layout responded to these concerns by reducing the number of turbines from 14 to 10. Access to the site is via the L51723. The route crosses old farm track before heading south where a clear span bridge is proposed to cross the Keerglen River.

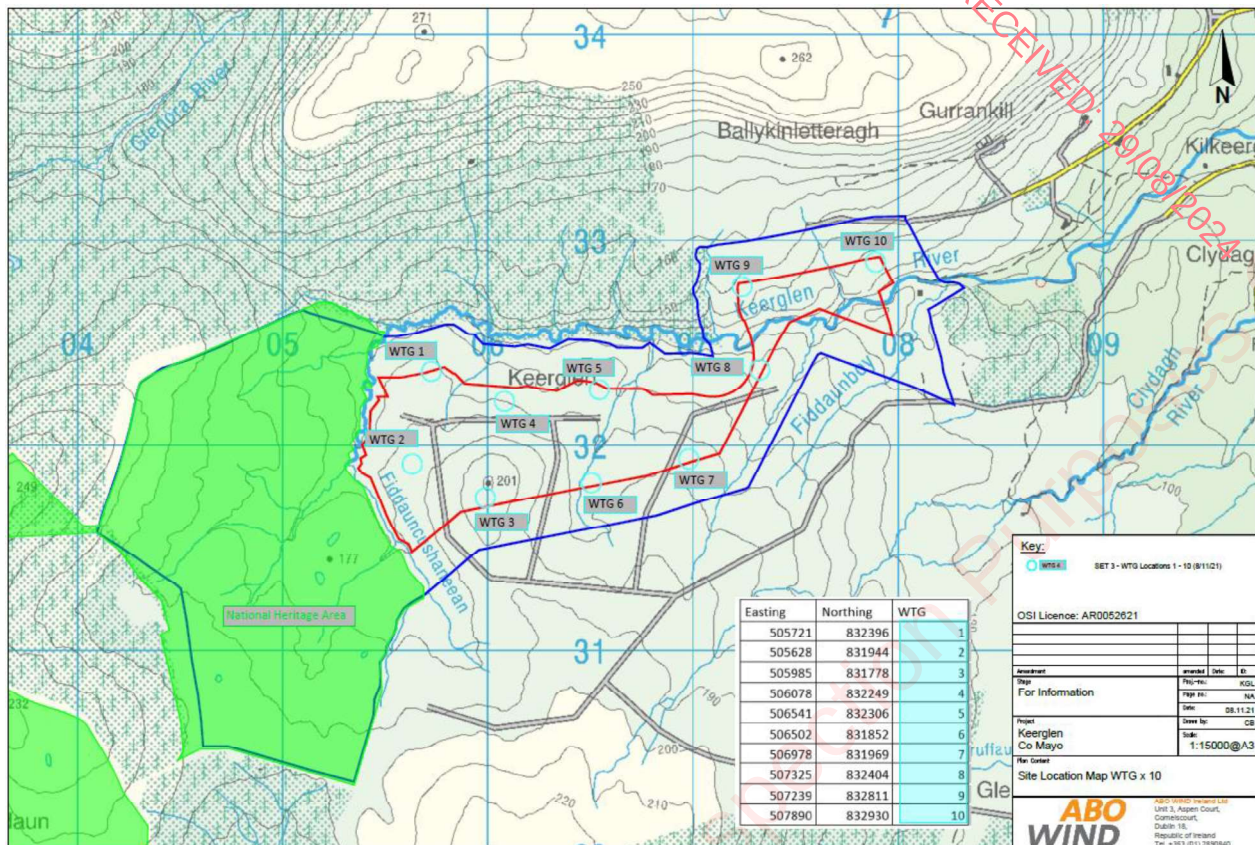


Figure 2.3: Subsequent Layout consisting of 10 no. Turbines

Layout 3

The third and final alternative layout which is the subject of this EIAR and planning application includes 8 turbines. The final design change involved the removal of 2 turbines and placement of all turbines south of the Keerglen River. Following further ecological studies and assessments of landscape and visual impacts the proposed development was set consisting of 8 no. wind turbines comprising of turbine tip heights ranging from 176-180m, rotor diameters ranging from 133-150m and hub heights ranging from 105-112m conforming with the Circular Letter PL 11/2023 availing of the flexibility provisions with regard to certain unconfirmed details as part of application for planning permission.

The final design incorporates detailed ecological studies on the site, reroutes the access to the site to avoid Annex 1 habitats. Access is now further to the east than was initially proposed in Layout 1 and Layout 2, along the L51723. The route heads south and crosses the Keerglen River before heading into the site.

The final turbine layout takes account of all constraints and the findings of the baseline assessments, surveys and site investigations that have been conducted throughout the preparation of this EIAR. The adjustments through each layout iteration resulted in placement changes to turbines to ensure sufficient distances were maintained from sensitive receptors and constraints, and to maintain the required separation distances between turbines. The potential environmental effects of the initial layout (14 no. turbines) and

second iteration layout (10 no. turbines) when compared with the proposed wind farm site layout are provided in Table 2.2 below.

Table 2.2 Comparison Environmental Effects of Iterative Layouts versus the Chosen Option		
Environmental Consideration	Layout Iteration No.1 – 14 No. Turbines	Layout Iteration No.2 – 10 No. Turbines
Population and Human Health	Potential for increased impact on sensitive receptors due to the closer proximity to some turbines.	Potential for increased impact on sensitive receptors but overall considered to be negligible having regard to addition of only two extra turbines
Biodiversity	Greater number of turbines leads to potential for increased impacts on Habitats.	Greater number of turbines leads to potential increased impacts on Habitats.
Land, Soils and Geology	Larger development footprint would result in greater volume of spoil to be excavated and stored.	Larger development footprint would result in greater volume of spoil to be excavated and stored.
Geotechnical	Larger development footprint would result in greater volume of peat and spoil to be excavated and stored.	Larger development footprint would result in greater volume of peat and spoil to be excavated and stored.
Water	Neutral as buffer applied to all streams and watercourses	Neutral as buffer applied to all streams and watercourses
Air & Climate	Potential positive impact for a greater reduction in greenhouse gas emissions and overall improvement in air quality.	Potential positive but overall negligible impact for a greater reduction in greenhouse gas emissions and overall improvement in air quality.
Noise & Vibration	Potential for greater noise impacts due to reduced separation distance between turbines.	Sensitive receptors could have slightly increased levels of noise although all would be within the recommended noise limits.
Landscape & Visual	Potential for greater landscape and visual amenity impact with proposal for 14 turbines	Reduced Landscape and Visual impact from Layout Iteration No.1 with reduction to 10 turbines. However, a greater impact than the proposed development which reduces impact further through the reduction to 8 turbines
Cultural Heritage & Archaeology	No adverse impacts on existing known archaeological assets. Larger infrastructure footprint results in increased potential for impact on	No adverse impacts on existing known archaeological assets. Slightly larger site footprint gives rise to a higher potential for negative impacts on unknown

	unknown archaeological/ cultural heritage assets during construction	archaeological and cultural heritage assets although risk is deemed to be very low.
Material Assets	Greater number of turbines resulting in more deliveries to site, increasing potential for traffic impacts. Although these deliveries will take place at off peak times and in accordance with a Traffic Management Plan	Greater number of turbines resulting in more deliveries to site, increasing potential for traffic impacts. Although these deliveries will take place at off peak times and in accordance with a Traffic Management Plan

2.2.3.3 Location of Ancillary Infrastructure

Construction Compound

Through the development of the preliminary site layout, a site construction compound location was identified. The construction compound will be used for the storage of all construction materials and turbine components. The construction compound was identified centrally within the site, adjacent to the proposed on-site electrical substation. The location was selected due to the ease of access from the existing track network, allowing for easy access to each of the proposed turbine locations centrally on site.

On-Site Electrical Substation

Through the development of the preliminary site layout, a potential on-site electrical substation location was identified. The energy output produced by each wind turbine will be transmitted to the on-site electricity substation via underground cabling. While overhead lines would enable easier repairs when required and are less expensive, underground cabling was chosen as this would result in this aspect of the development creating no visual impact. A location was identified more centrally within the site, location approximately equidistance between WTG 5 and WTG6, centrally on the site. This location was chosen as the preferred location of the on-site substation as it is centrally located and can be accessed via proposed internal access tracks which run parallel to the substation.

Wind Farm Road Layout

The site benefits from modest existing access tracks which currently facilitate movement of livestock to graze land and turf cutting operations fields set within the developable site area. During the design of the preliminary layout the existing track network was utilised as much as possible to minimise the amount of new track required to facilitate the transportation of wind farm infrastructure (turbine components etc) and construction materials.

As the wind farm site layout was finalised, the most suitable routes between each component of the development were identified, having due regard of the existing road network and physical constraints of the site. An alternative to this would be to construct an entirely new wind farm road network with no consideration given to the existing tracks. This approach was dismissed as it would have the potential to create additional

and unnecessary environmental impacts. Accordingly, the approach to utilise the existing track network where possible was maintained throughout the iterative design process.

2.2.4 Alternative Turbine Scale

The specifications of wind turbines are undergoing a continuous process of development. Therefore, a final decision on the particular model of turbine to be installed on this site will be confirmed closer to the construction stage should planning permission be granted and when a definite date for connection to the national grid has been confirmed by the network operator.

For the purposes of this EIAR a range of turbines have been assessed within an envelope comprising of turbine tip heights ranging from 176-180m, rotor diameters ranging from 133-150m and hub heights ranging from 105-112m conforming with the Circular Letter PL 11/2023 availing of the flexibility provisions with regard to certain unconfirmed details as part of application for planning permission. The capacity and performance of wind turbines is related to their scale. Increasing the height of the turbine to heights where wind speeds are higher increases the performance of the turbine. The maximum 180m tip height scale at the Keerglen Wind farm site is considered appropriate for the site to ensure the most efficient use of the wind resource is achieved whilst having due regard to the character of the site.

The use of alternative smaller scale turbines at this site would not be appropriate as they would fail to make the most efficient use of the wind resource at the site and would potentially require a larger development area, with a higher number of smaller turbines required to deliver a viable wind energy development.

The proposed ground-to-blade tip height range of 176m to 180m was determined following a preliminary landscape and visual impact assessment, carried out by Macro Works in order to confirm the maximum capacity of Keerglen site in terms of the number of turbines and also the maximum potential ground-to-blade tip height.

2.2.5 Alternative Underground Electricity Export Connection Option

While overhead lines would be a more cost-effective method for connecting the wind farm to a connection point as it is the cheapest of all potential connection methods, and would allow for easier repairs when required, it was determined that an underground cable would be the preferred method as this would prevent any visual impact on the surrounding landscape. This approach accords with the recommendation outlined in the DWEDGs where it is stated that that underground cables are the preferred option for the connection of wind energy developments to the national grid:

"In general, it is considered that underground grid connections for wind energy projects are the most appropriate environmental and/or engineering solution, particularly in sensitive landscapes where the visual impacts need to be minimised. Therefore, this should be the default approach..."

[Our emphasis.]
[Page 42, Draft Wind Energy Development Guidelines 2019]

As mentioned in Section 2.2.2.3 above, during the process of selecting an appropriate location for the proposed Keerglen Wind Farm to connect to, both Tawnaghmore and Bellacorick substations were considered as a possible options, along with lands at Killala business park which have the potential of hosting a selection of Large Energy Users (i.e. one Data Centre received planning permission in 2017, planning reg. ref. 16694).

However, upon a detailed review, Table 2.3 compares the options and from the Tawnaghmore substation and the lands at Killala business park were chosen as the preferred options as they are closer to the Site, thus having less of an environmental impact as a result of the construction of a future underground electricity export connection route. In the interest of clarity, both options considered are detailed below:

Option 1 is an underground electricity export connection cabling route, connecting the proposed onsite electricity substation to the existing Tawnaghmore ESB substation or Large Energy User at Killala Business Park. For clarity, Tawnaghmore substation is located within the confines of Killala business park. Killala Business Park is located approximately 22.8km to the east of the site. The underground electricity export connection cabling route runs entirely along a combination of tracks (within the wind farm site) and public roads.

Option 2 is an underground cabling route connecting the proposed onsite substation to the existing Bellacorick 110kV substation. The Bellacorick substation is located approximately 39km to the south west of the site. This underground electricity export connection route runs entirely along a combination of agricultural tracks (within the wind farm site) and public roads.

As can be seen in Figure 2.4 each of the options share the same route heading south along the R315 until the option follows the public road east for 8.5km passing through Kincon. The route then takes a left along the public road followed by the first right. The route then follows the road 1km to join with the R314 and around to the substation. Option 2 goes south along the R315 for 14.5km to Crossmolina before turning right along onto the N59 and moving west on this road for 18.2km to reach the substation.



one key factors that were considered in option:

electricity export connection option:

Archaeological Constraints

	directional drilling will be carried out at bridge locations, it is assessed that the underground electricity export connection infrastructure will have no cumulative construction or operational stage effect on the archaeological, architectural or cultural heritage resource.	NIAH listed structures along this route there is greater potential to disturb unknown archaeological assets.
Number of Water crossings	There are 17 no. crossings on the underground electricity export connection route.	13 Water Crossings. Watercourse crossing methods will ensure instream works are avoided.
Potential for Traffic & Transportation Disturbance	Potential slight and short-term disturbance to the transport network along the underground electricity export connection route. Route avoids reduces impact as much as is practicable.	Longer distance of the underground electricity export connection route on public road corridors, leading to an increased potential impact.
Potential Disturbance to Residential Properties	Potential slight and short-term disturbance to the residential properties located along the underground electricity export connection route. Route impact is considered to be favourable in comparison to Option 2 which impacts more residents.	A significantly longer route than Options 1 and therefore has the potential to impact more residential properties. This route passes through the town of Crossmolina which has a population of 1,134 people (CSO Census, 2022).
Air & Climate	Potential for increased vehicular and dust emissions through traffic movements along the cable route	Longest route so will require more excavations, and thus more vehicle emissions, leading to an increased potential impact.
Noise & Vibration	Temporary construction phase noise. Avoids residential	Temporary construction phase noise. Avoids residential

	settlements as much as is practicable.	settlements as much as is practicable. This route passes through the settlement of Crossmolina which has a population of 1,134 people (CSO Census, 2022) and therefore has the potential to impact an increased number of people.
Landscape & Visual	No visual impact	No visual impact

Having considered the relevant factors outlined in Table 2.3 above, Option 2 was discounted as it had the potential to create greater environmental impacts when compared with Option 1 mainly due to the fact that the route is c.16km longer. Accordingly, Tawnaghmore substation and the lands at Killala Business Park have been identified as viable connection points to facilitate the development of this wind energy project and a planning application will be made for such in the future. Figure 2.5 below illustrates the same.

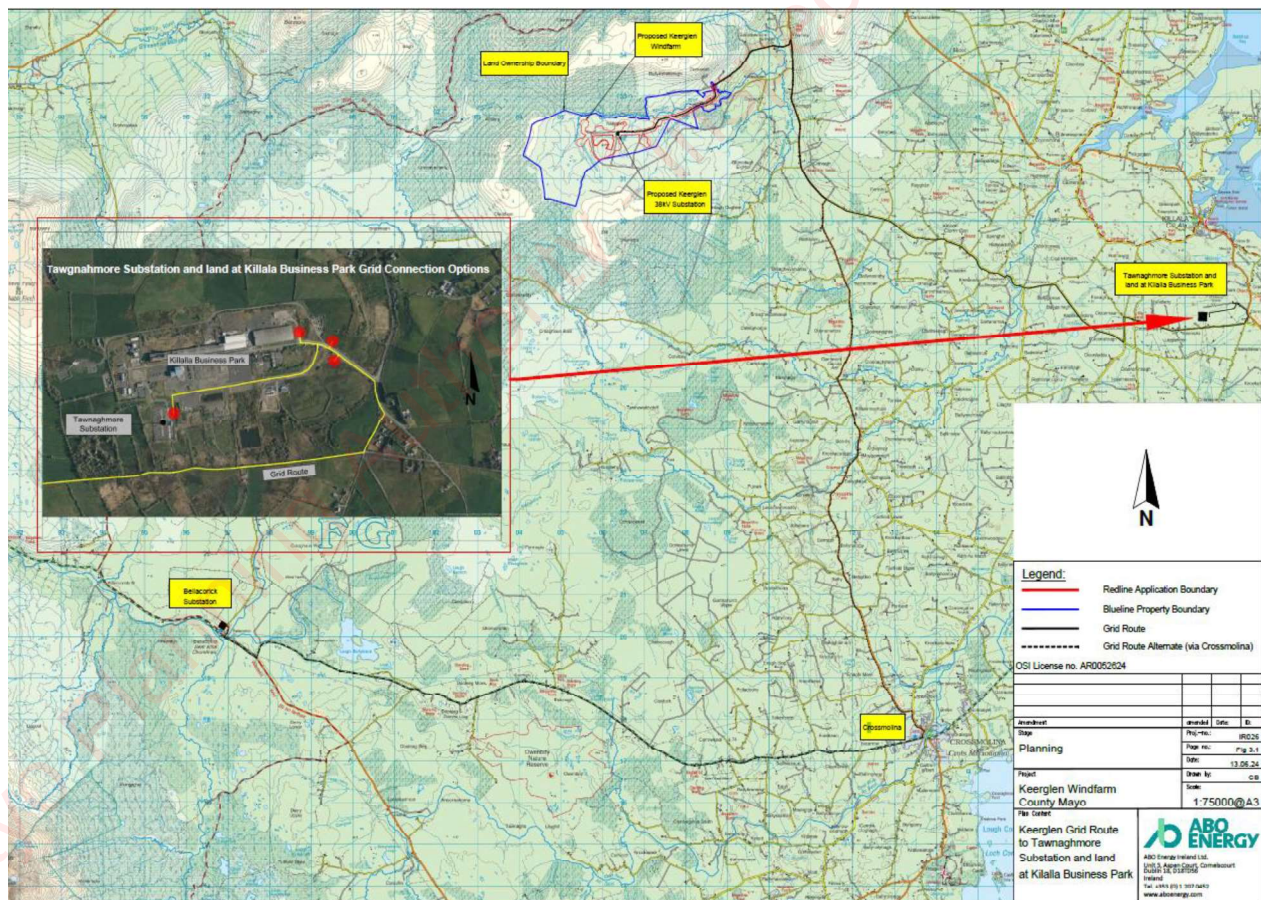


Figure 2.5: Keerglen Underground Electricity Export Connection to Tawnaghmore Substation and land at Kilalla Business Park

2.2.6 Alternative Turbine Delivery Route

Port entry is required for delivery of wind turbine components. The alternatives considered for such included Galway Port and Killybegs. Each of these ports has the capability of facilitating the importation of turbine components and therefore are equally viable alternatives.

The delivery from the Port of Killybegs to the site will utilise the main National and Regional classified roads as far as is possible. The route will go from the Port to Donegal town via the N56, the route will then head south on the N15 from Donegal town to Sligo town. The route then takes the N17 through Charlestown before turning onto the L331. The route then takes the N26 via Swinford to Ballina where it exits onto the N59. Taking the N59, the route exists onto the L1108 before joining the R315. The route then heads north on the R315 before turning onto the L51723 which leads to the site entrance. An overview of the turbine delivery route is presented in Figures 1.1, 1.2 and 3.2. Deviations of the route have been screened in through this process, the exact final route to be proposed separate to this planning application.

Certain Points of Interest (POI), or constraint areas, have been identified along the route options from the Port of Killybegs and screened for the purposes of this EIAR. These are illustrated in Figure 1.1 and have been assessed in the relevant chapters throughout this EIAR. The final route selection will be subject of a separate subsequent planning application. At that stage the preferred route to site will be the responsibility of the chosen turbine supplier and subject to their detailed route assessments. The large turbine components will be transported at off peak times with Garda and safety vehicle escort as required.

2.2.7 Alternative Site Access

The proposed site entrance for Keerglen Wind farm is located along the L51723. This entrance will act as the main construction and operations entrance to the site. It will facilitate material deliveries to the site (stone, steel and concrete) as well as large oversize components such as turbine blades, tower sections and substation components. Internal access roads will be constructed as part of the initial phase of the construction of the wind farm.

An alternative site access that was considered was the use of the local Clydagh Commonage Road, located to the east of the site. However, if this road were to be used, significant upgrades and works would be required to facilitate the delivery of turbine components. This would have the potential to create additional transport related disturbance and nuisance to local residents and as such was considered sub optimal when compared with the proposed site access.

2.2.8 Alternative Processes / Sources of Energy

Fossil fuels and non-renewable forms of energy would be the primary alternative energy sources required to provide Ireland's ever-growing electricity requirements if Keerglen Wind Farm were not to be developed. The use of such energy sources will further exacerbate the issue of climate change, fuelling greater greenhouse gas emissions. In this regard, Ireland has numerous significant commitments to meet its

International, European and National climate change and greenhouse gas reduction obligations as discussed in detail in Chapters 1 and 4 of this EIAR.

Solar energy technology was considered as an alternative method of facilitating renewable energy production from the site. However, to produce an equivalent amount of energy as to that expected from the proposed wind farm development, a considerably greater development area would be required, resulting in the creation of a higher level of potential environmental impacts. Accordingly, this technology was not considered as a feasible alternative.

2.2.9 Alternative Land Use

The existing land use at the site predominately consists of peat extraction and agricultural farming. The existing land use will not be significantly altered by the proposed development on the whole, as only approximately 5.8% of the total wind farm site area is to be utilised on a permanent basis for the purposes of the wind farm and its ancillary infrastructure. Notwithstanding, the proposal of a wind farm development is compatible with the existing peat extracting and agricultural use of the Site. The site is not designated for residential, commercial or other uses within the Mayo County Development Plan 2022 – 2028 (as varied). As a result, the consideration of alternative uses was not considered necessary or justified.

2.2.10 Alternative Mitigation Measures

Mitigation through avoidance has been the primary measure employed for the Keerglen Wind Farm development, spanning from site selection through the iterative design process and the preparation of this EIAR. Through utilising such an approach it has been possible to avoid ecologically and environmentally sensitive areas and thus limit the impact on associated receptors. The alternative to this approach is to pursue a development proposal within identified areas of environmental sensitivity and thus increase the potential of associated environmental impacts.

Where it was not possible to completely avoid potential environmental impacts as a result of the proposed development, best practice design and mitigation measures have been proposed throughout this EIAR. Such proven best practice measures ensure that the risk of any potential environmental impacts associated with the Keerglen Wind Farm development are appropriately reduced and mitigated. The level of mitigation proposed is determined to be proportionate to the potential impact and the proposed mitigation measures are those considered to have the least environmental effects. The alternative is to either not propose these measures or propose measures which are not best practice and effective,

2.3 Scoping

The carrying out of scoping or pre-application consultations is an informal but widely practised means of ensuring that all relevant issues associated with a proposed development are considered and addressed prior to the submission of a planning application. This consultation offers the opportunity to gain advice and help from a wide range of state-bodies, organisations, individuals, local communities and interest groups on

a formal and informal basis. Appropriate consultation is usually an essential part of the process of Environmental Impact Assessment, without which the effectiveness of the process as a whole may be greatly diminished.

The scoping process identifies the issues that are likely to be important during EIA and eliminates those that are not. The importance of scoping cannot be over emphasised. It provides an opportunity for the review of information and consideration of alternative solutions at an early stage in the process allowing the applicant to evolve the design of the development accordingly.

2.3.1 Statutory and Non-Statutory Stakeholders

A number of statutory and non-statutory stakeholders were identified and contacted by email in November 2021, to ask if they wished to raise any observations or concerns about the proposed development and to provide comments. A Scoping Report and other relevant project information accompanied the e-mail. The Scoping Report is included at Appendix 2.1, and responses received are included at Appendix 2.2. Of the 24 statutory and non-statutory stakeholders contacted:

- 11 responded;
- 13 had not responded at the time of writing.

A summary of the responses received from stakeholder consultees is provided in Table 2.4.

Table 2.4 Summary of Consultee Responses		
Consultee	Response	Summary of Response
Department of Defense	No	N/A
An Taisce	No	N/A
Birdwatch Ireland	No	N/A
Faite Ireland	Yes	Sent a copy of Fáilte Ireland's Guidelines for the Treatment of Tourism in an EIA, which they recommend should be taken into account in preparing the EIAR.
The Heritage Council	No	N/A
Environment Protection Agency	Yes	Sent a response saying that the correspondence has been forwarded for attention but no guidance followed this.
Irish Raptor Study Group	No	N/A
Irish Wildlife Trust	Yes	Sent a response saying that they haven't the capacity to respond but will keep the consultation on file.
Health Service Executive	Yes	Sent a response detailing a list of documents the HSE would like the applicant to adhere to in their application.
Irish Peatland Conservation Council	Yes	Sent a response which outlined concerns about the proposed project in relation to the impacts of the proposed development on habitats, birds and peat conservation. IPCC also advised that the application assesses cumulative effects, carbon cost and the impact of the project on the Water Framework Directive.
Teagasc	No	N/A
Development Applications Unit, DAHG	No	N/A

Dept. of Agriculture, Food and the Marine	Yes	Provided guidance on forestry, felling licenses and replanting obligations
Department of the Environment, Climate and Communications	Yes	Sent a response which encourages the use and reference of their datasets. The DECU also asked for a copy of reports detailing any site investigations carried out. Should any significant bedrock cuttings be created, the DECU asked 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.
Geological Survey Ireland	Yes	Sent a response which encourages the use and reference of their datasets. GSI also asked for a copy of reports detailing any site investigations carried out. Should any significant bedrock cuttings be created, GSI asked 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.
Office of Public Works	Yes	Sent a response which asked that OPW be notified if the cable route significantly changes and interferes with OPW drainage channels in the area. The response also outlined the need for a Section 50 approval if the development requires the construction of a culvert or bridge over a watercourse.
Department of Housing, Local Government and Heritage	Yes	Sent a response outlining that in the event of observations, we will receive a co-ordinated heritage-related response by email from Development Applications Unit (DAU).
Inland Fisheries Ireland	No	N/A
The Art's Council	No	N/A
Met Eireann	No	N/A
Irish water	Yes	Sent a copy of Irish Water guidance for EIAR scoping
TII	No	N/A
Commission for Regulation of Utilities	No	N/A
Sustainable Energy Authority of Ireland	No	N/A

Copies of responses were forwarded to the EIAR project team to ensure that any points/concerns raised by consultees could be adequately addressed in the relevant chapter of the EIAR.

18 telecom operators were also contacted as part of the consultation for the Aviation, Telecommunications and Electromagnetic Interference chapter. A summary of this consultation is provided in Chapter 9.

2.3.2 Statutory Planning Authority

A pre-application meeting with Mayo County Council took place on the 29th March 2022. The purpose of this meeting was to make the Mayo County Council Planners aware of the emerging proposals for the site; the environmental surveys and studies that had been undertaken to that point; the proposed structure of the Planning Application and EIAR; and the broad timeline for submission of the application. Following the meeting a set of Viewpoints for consideration in the Landscape and Visual Impact Assessment Chapter of the EIAR were agreed via e-mail.

Separate consultation also took place between the Mayo County Council Roads Department and the Project Transport Engineers, Roughan & O'Donovan Consulting Engineers. Accordingly, the preparation of the Traffic and Transport Chapter was prepared following consultation with the Executive Engineer from Ballina of Mayo County Council. This included a telephone conversation on 24th February 2021 and follow up email correspondence. The scope of the traffic and transport assessment, including determining the baseline traffic conditions were agreed.

Following the published Circular Letter PL11/2023 regarding '*New design flexibility provisions with regard to certain unconfirmed details as part of application for planning permission*', ABO Energy Ireland Ltd engaged with Mayo County Council to host a Flexibility Meeting which was hosted via Microsoft Teams on Monday 25th March. Following the publishing of the Circular Letter PL11/2023, ABO Energy Ireland Ltd deemed it appropriate that the proposed application be made and decided availing of the newly adopted design flexibility provisions with regard to certain unconfirmed details as part of application for planning permission. Specifically, as the specifications of wind turbines are undergoing a continuous process of development and as the project is at the planning stage, a decision on the final turbine model selection has cannot be made by developers. The Circular Letter provides an appropriate avenue for this exact matter to be incorporated into the planning system enabling applications to detail a range of design parameters to form part of future planning applications. In this case a number of candidate turbines are available on the market which fit within the specified range of hub height, rotor blade, and maximum tip height parameters that have been identified and are considered accordingly as part of this planning application and EIAR.

2.4 Public Consultation

ABO Energy Ireland Ltd. are committed to public consultation and stakeholder engagement, which recognises the right of residents to have a meaningful role in developments that affect their community. To ensure a comprehensive public consultation, the applicant has been guided by the IWEA (2016) *Code of Practice for Wind Energy Development in Ireland: Guidelines for Community Development* and section 4.3.2 of the DWEDGs which highlight the importance of early and meaningful community consultation in advance of and in addition to the statutory public consultation as part of the planning process. Further details of the public consultation are included in the Community Report in Appendix 2.3, however in brief the process included the following methods:

- Door to Door consultation with nearest neighbours of the site;
- Distribution of Project Newsletters;
- Provision of a dedicated of a Project Website;
- Phone Calls and Written Communication with local residents;
- Written Communication with key Community Groups and Clubs;
- Meetings, Phone Calls and Written Communication with Elected Public Representatives;
- Meetings, Phone Calls and written communication with the local media (Western People);

- A Town Hall Public Consultation Meeting

2.4.1 Statutory Notice

This applicant is required by law to provide statutory notices of the proposed development under the *Planning and Development Act 2000, as amended*. This includes a newspaper notice and site notices at entrances to the proposed development. This starts a formal phase of community consultation where submissions can be made to Mayo County Council. A copy of the statutory notices pertaining to the proposed Keerglen Wind Farm project are included in the submitted planning application pack.

2.5 Conclusion

The Applicant has taken the necessary measures to ensure that, before submitting an application for development, an examination of alternative solutions, scoping exercises and public consultation was carried out in full. The feedback and scope of issues raised by statutory and non-statutory consultees has guided the design of the proposed development. This process has allowed the applicant to fully anticipate the effects on the environment caused by a development and avoid or reduce the impact where possible. The evolution of the design and alternatives explored reflects this.

As discussed in the Community Report (Appendix 2.3), there has been open and transparent two-way dialogue pursued with the local community from an early stage in the development process, and this will continue moving forward.

It should be acknowledged that this is not the end of the consultation period, with further opportunities for the community and consultees to become involved throughout the formal planning process by making submissions to Mayo County Council.