

Appendix 2.1

Scoping Report

Keerglen Wind Farm

Mayo Planning Authority - Inspection Purposes Only

Keerglen Wind Farm, Co. Mayo

Scoping Report

ABO Wind Ireland LTD

February 2022



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Mayo Planning Authority - Inspection Purposes Only

1. Introduction

ABO Wind Ireland Ltd. (ABO Wind) intend to develop Keerglen Wind Farm, County Mayo, and have commenced the process of Environmental Impact Assessment (EIA) to support a forthcoming planning application that will be submitted to Mayo County Council.

The proposed wind farm site ("the Site") currently consists of approximately 115.7 hectares of moorland and forestry, opening to rural / pastoral landscape to the east. The site is located circa 5.5 km to the south of Ballycastle and 15 km north of Crossmolina, County Mayo.

ABO Wind are managing and coordinating the preparation of the planning application and the Environmental Impact Assessment Report (EIAR). To assist with the preparation of the EIAR, ABO Wind have engaged a team of multidisciplinary expert consultants to carryout baseline survey work, conduct impact assessments and provide advice throughout the wind farm design process.

The wind farm layout has already been subject to an iterative design process and at this stage it is envisaged that the Site has the potential to accommodate a wind energy development in the region of 50MW, with the developable area of the Site currently capable of accommodating circa 10 wind turbines.

This document provides preliminary details on the proposed Keerglen Wind Farm and has been prepared for consultation purposes as part of the EIA process.

The Applicant

ABO Wind Ireland Ltd. (ABO Wind) was established in Ireland in 2008 and is a subsidiary of ABO Wind AG, one of Europe's most successful developers of wind energy projects. With headquarters in Wiesbaden, Germany it plans, builds, maintains and operates wind farms along with other renewable energy technologies. Since 1996, the company has developed and sold wind energy, solar and biogas projects with an output of circa 3,500 megawatts.

In Ireland, ABO Wind Ireland Ltd has successfully developed and constructed five wind farms in Ireland with a capacity of circa 95 Megawatts, including Glenough Wind Farm in Co. Tipperary, Gortahile Wind Farm in Co. Laois and Gibbet Hill Wind Farm in Co. Wexford. In 2011, Glenough Wind Farm, one of the largest wind farms (35MW) ever constructed by ABO Wind Ireland Ltd was connected to the grid. Gortahile Wind Farm (20MW) has been in operation since August 2010. The project at Gibbet Hill with a total capacity of 15MW was connected to the grid in 2013. The most recent project connected to the grid was the first Phase of Clogheravaddy Wind Farm, a 20MW project in County Donegal. The second phase of this project is expected to be connected to the grid by the end of Q1 2022.

Environmental Impact Assessment Requirement

EIA requirements derive from the EIA Directive 2011/92/EU as amended by Directive 2014/52/EU. The amended Directive was transposed into Irish law through the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 which came into effect on 1 September 2018. The regulations set out the information to be contained in the EIA and the thresholds for developments for which such assessments are required. The primary objective of the EIA Directive is to ensure that projects, which are likely to have significant effects on the environment, are subject to an assessment of their likely impacts.

Part X of the Planning and Development Act, 2000, as amended, states that where a planning application is made in respect of a development or class of development referred to in the act under Section 176 that the development shall, in addition to meeting the requirements of the planning regulations be accompanied by an EIAR.

Schedule 5 of the Planning and Development Regulations 2001, as amended, sets out the developments and thresholds that are specified for the purposes of Part 10. In reference to energy industry, developments which comprises 'the installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts' are specifically stated in Schedule 5, Part 2 (3) (i).

The proposed development will consist of circa 10 turbines. Accordingly, the proposed development will engage the requirement for a full EIA to be carried out by the competent authority.

In respect of the information contained within the EIAR, it will be prepared in accordance with Schedule 6 of the Planning and Development Regulations 2001, as amended, Directive 2014/52/EU, amending Directive 2011/92/EU, relating to the information to be contained in an EIAR, and the Environmental Protection Agency (EPA) 'Draft Guidelines on the Information to be contained in Environmental Impact Assessment Reports' (2017).

Purpose of EIA Scoping

The purpose of EIA scoping is to identify environmental topics for which potential significant environmental impacts may arise as a result of the proposed development, either on its own or cumulatively with other projects. It seeks to provide a framework for the expert evaluations of the identified environmental topics while outlining the structure to be followed during the preparation of the EIAR and the appropriate level of information to be provided in the EIAR.

EIA scoping further seeks to facilitate a process of consultation with Statutory consultees, inviting them to identify any potential requirements, impacts or considerations that should be included during the preparation of the EIAR.

Accordingly, this Scoping Report is provided to all relevant Statutory consultees for their consideration and comment with regard to the proposed development of Keerglen Wind Farm.

2. The Proposed Development

Site Context

The Site is situated in a small upland valley of moorland and forestry, opening to rural / pastoral landscape to the east. The site is located circa 5.5 km to the south of Ballycastle and 15 km north of Crossmolina, County Mayo. In terms of land use, the Site generally comprises of moorland which is characterised by low-growing vegetation on acidic soils. There is a bog located to the south of the site. Turf is harvested in this area of the site.

Keerglen River runs c.100m north of the site boundary. It also runs 100m west of the site boundary. The closest nationally designated site is the Ummerantarry Bog National Heritage Area (NHA), which is located c.250m west of the site boundary. The Glenamoy Bog Complex Special Area of Conservation (SAC) is located c.1.4km north of the site boundary. The Bellacorick Bog Complex SAC is located c.2.3km south of the site boundary. The potential for the proposed development to have any impact on designated sites will be assessed as part of the EIA process.

In terms of the surrounding road network the site is bound by a number of local roads and local road laneways. The nearest secondary road to the site is the R315 located c.2.3km east of the site as it joins Ballycastle to Crossmolina. The N59 National Primary Road is situated 14.8km south of the site.

The Proposed Development

The proposed development of Keerglen Wind Farm at this stage is likely to comprise of approximately 10 wind turbines with a maximum overall blade tip height of 185m. The proposed development is also likely to consist of the following¹ :

- 1no. permanent Met Mast;
- 1no. 38kV electrical substation;
- Hardstanding's/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;
- All associated infrastructure and site development works.

A site location plan is included at Figure 1, while the current indicative wind farm layout is included at Figure 2.

Grid Connection

Electricity energy generated from Keerglen Wind Farm will be connected to the national electricity grid via a 38kV underground cable from a proposed electrical substation at the Wind Farm to the existing 38kV/110kV substation at Tawnaghmore in the townland of Tawnaghmore Upper, Co. Mayo. It is proposed that the majority of the grid connection infrastructure will be installed underground within the body of the public road network along the route. In some isolated instances, in order to traverse water crossings along the grid route it may be necessary to utilise overhead lines, spanning a limited distance over the water crossing before re-establishing the cabling underground and continuing along the route to the Tawnaghmore substation.

The grid connection route is circa 19.3km in length between the proposed Keerglen Wind Farm and Tawnaghmore substation as shown in Figure 3.

¹ This is a provisional development description and is subject to amendments prior to submission of the application

3. Need for the Proposed Development

Legislative and Policy Context

On the 10th December 2015, the Irish Government signed into law, the Climate Action and Low Carbon Development Act. This provided for the establishment of a national framework to facilitate a low carbon, climate resilient, and environmentally sustainable economy by 2050. The Act serves as a primary piece of legislation and was enacted in response to Ireland's legally binding commitments set out in the Paris Agreement.

The Paris Agreement is a universal, legally binding global climate change agreement. 195 countries signed the agreement which set out a global framework to mitigate against dangerous climate change by limiting global warming to well below 2°C and pursuing efforts to limit it to 1.5°C. It also aims to strengthen countries' ability to deal with the impacts of climate change and to support them in their efforts.

The Intergovernmental Panel on Climate Change (IPCC), a scientific body that provide clear and up to date views of the current state of scientific knowledge relevant to climate change, have made clear that the window for action on climate change is rapidly closing highlighting that each of the last three decades has been successively warmer at the Earth's surface than any preceding decade since 1850.

The IPCC report that continued emissions of greenhouse gases will cause further warming and changes in all components of the climate system and to limit Climate change, substantial and sustained reductions of greenhouse gas emissions will be required. The energy supply sector is the largest contributor to global greenhouse gas emissions. As such, the IPCC have recommended that renewable energy sources (including wind energy) will have to grow from 30% of global electricity to 80% by 2050 in order to meet the commitments contained within the Paris Agreement.

In a European context, the EU Renewable Energy Directive (2009/28/EC) was published in April 2009 and sought the promotion of the use of energy from renewable sources. The Directive set a mandatory national target for the overall share of energy from renewable sources for each Member State. This package was designed to achieve the EU's overall 20:20:20 environmental target, consisting of a 20% reduction in greenhouse gases, a 20% share of renewable energy in the EU's total energy consumption and a 20% increase in energy efficiency by 2020.

In December 2018, a revised EU Renewable Energy Directive 2018/2001/EU (RED II) came into force and shall be transposed by June 2021. This new regulatory framework includes a binding renewable energy target of 32% for the EU by 2030. It further includes a review clause whereby an upward revision of this target will be considered by 2023.

In August 2019 the Climate Action Plan (CAP) was published by the Irish Government. The CAP recognises the need for decisive action to tackle climate disruption. It sets out an ambitious course of action to address the impacts which greenhouse gases and climate change may have on Ireland's environment, society, economic and natural resources. The CAP clearly recognises that Ireland must significantly step up its commitments to tackle climate disruption. One of the key targets set out in the CAP is to increase electricity from renewable sources to 80% by 2030.

In June 2020, a programme for government was agreed by the collation of Fine Gael, Fianna Fail and the Green Party. Outlined within the programme is a commitment to deliver a 'Green New Deal' which shall deliver a reduction in overall greenhouse gas emissions by on average 7% per annum between 2021 to 2030, with the aim of achieving net zero by 2050. The programme further outlines the governments ambition to pursue a rapid decarbonisation agenda through the delivery of renewable electricity.

The Climate Action Plan 2021 was published on the 4th of November 2021 and sets out a detailed sectoral roadmap designed to deliver a 51% reduction in greenhouse gas (GHG) emissions by 2030. This doubles the ambition of the 2019 Climate Action Plan, and will require significant reductions from all sectors, recognising that the abatement potential will vary by sector.

In order to achieve these goals, the target for renewables on the national grid has been increased from 70% by 2030 to up to 80%. This will include an increased target of up to 8 Gigawatts of onshore wind energy. Target 112 of the 2021 Climate Action Plan relates to this proposed development, notably "to develop the onshore electricity grid to support renewable energy targets".

In this context, new renewable wind energy developments are of the utmost importance to facilitate Ireland's transition toward carbon neutrality. Ireland is a world leader when it comes to incorporating large amounts of wind-generated energy onto the electricity network, widely regarded as the main contributor to facilitating Ireland's climate change and energy supply obligations. Proposed developments like Keerglen Wind Farm and other wind energy developments will further contribute towards this national effort and will play a critical role in addressing Ireland's climate change and renewable energy targets and obligations.

4. Environmental Impact Assessment Report Methodology

Environmental Impact Assessment Report Structure

The EIAR will be prepared in compliance with the provisions set out in the revised EIA Directive 2014/52/EU (Revised Directive) which was transposed into Irish legislation in September 2018. The draft EPA guidelines on the information to be contained in environmental impact assessment reports, dated August 2017 will also be used as a key point of reference in the compilation of the EIAR.

The Revised Directive and EPA guidance document describes the minimum information that an EIAR is to contain:

- a) a description of the project comprising information on the site, design, size and other relevant features of the project;*
- b) a description of the likely significant effects of the project on the environment;*
- c) a description of the features of the project and/or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;*
- 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;*
- e) a non-technical summary of the information referred to in points (a) to (d); and*
- f) any additional information specified in Annex IV relevant to the specific characteristics of a particular project or type of project and to the environmental features likely to be affected.*

The format of the EIAR will be designed to ensure that standard methods are used to ensure that all of the information set out above is captured and clearly described in each section of the EIAR. Each specialist environmental topic will generally assessed and described in terms of:

- Introduction;
- Statement of competence;
- Site/Development Description;
- Methodology;
- Potential Impacts (associated with the proposed development);
- Mitigation and Monitoring Measures (for any identified impacts);
- Residual Impacts
- Conclusions

Proposed Environmental Impact Assessment Report Topics

It is proposed that the following topics be covered as part of the EIAR for Knockroe Wind Farm:

Table 1.1 EIAR Topics	
Subject	Chapter
Alternatives, Scoping and Consultation	2
Description of development	3
Policy and legislation	4
Biodiversity - Ornithology	5
Biodiversity – Terrestrial and Aquatic Ecology	6
Soils, Geology, Hydrogeology and Hydrology	7
Material Assets – Aviation, Telecommunications and Electromagnetic Interference	8
Landscape and Visual	9
Shadow Flicker	10
Noise	11
Archaeology and Cultural Heritage	12
Transport, Traffic & Access	13
Population and Human Health	14
Air quality and Climate	15
Interactions of the Foregoing	16

Description of Likely Significant Effects and Impacts

As stated in the Draft 'Guidelines on the Information to be contained in Environmental Impact Assessment Reports' (EPA, 2017), an assessment of the likely impacts of a proposed development is a statutory requirement of the EIA process. The statutory criteria for the presentation of the characteristics of potential impacts requires that potential significant impacts are described with reference to the extent, magnitude, complexity, probability, duration, frequency, reversibility and trans frontier nature (if applicable) of the impact.

Table 1.2 below, presents a summary of impacts as published in the EPA guidelines. Standard definitions are provided which permit the evaluation and classification of the quality, significance, duration and type of impacts associated with a proposed development on the receiving environment. The use of pre-existing standardised terms for the classification of impacts ensures that the EIA employs a systematic approach, which can be replicated across all disciplines covered in the EIAR. The consistent application of terminology throughout the EIAR facilitates the assessment of the proposed development on the receiving environment.

Table 1.2 Impact Classification Terminology (EPA, 2017)		
Impact Characteristic	Term	Description
Quality	Positive	A change which improves the quality of the environment
	Neutral	No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error
	Negative	A change which reduces the quality of the environment
Significance	Imperceptible	An effect capable of measurement but without significant consequences
	Not Significant	An effect which causes noticeable changes in the character of the environment but without significant consequences
	Slight	An effect which causes noticeable changes in the character of the environment without affecting its sensitivities
	Moderate	An effect that alters the character of the environment in a manner consistent with existing and emerging baseline trends
	Significant	An effect, which by its character, magnitude, duration or intensity alters a sensitive aspect of the environment
	Very Significant	An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment
	Profound	An effect which obliterates sensitive characteristics
Extent and Context	Extent	Describe the size of the area, number of sites and the proportion of a population affected by an effect
	Context	Describe whether the extent, duration, or frequency will conform or contrast with established (baseline) conditions
Probability	Likely	Effects that can reasonably be expected to occur because of the planned project if all mitigation measures are properly implemented
	Unlikely	Effects that can reasonably be expected not to occur because of the planned project if all mitigation measures are properly implemented

Duration and Frequency	Momentary	Effects lasting from seconds to minutes
	Brief	Effects lasting less than a day
	Temporary	Effects lasting less than a year
	Short-term	Effects lasting one to seven years
	Medium-term	Effects lasting seven to fifteen years
	Long-term	Effects lasting fifteen to sixty years
	Permanent	Effect lasting over sixty years
	Reversible	Effects that can be undone, for example through remediation or restoration
	Frequency	Describe how often the effect will occur. (once, rarely, occasionally, frequently, constantly – or hourly, daily, weekly, monthly, annually)
Type	Indirect	Impacts on the environment, which are not a direct result of the project, often produced away from the project site or because of a complex pathway
	Cumulative	The addition of many minor or significant effects, including effects of other projects, to create larger, more significant effects
	'Do Nothing'	The environment as it would be in the future should the subject project not be carried out
	Worst Case	The effects arising from a project in the case where mitigation measures substantially fail
	Indeterminable	When the full consequences of a change in the environment cannot be described
	Irreversible	When the character, distinctiveness, diversity, or reproductive capacity of an environment is permanently lost
	Residual	Degree of environmental change that will occur after the proposed mitigation measures have taken effect
	Synergistic	Where the resultant effect is of greater significance than the sum of its constituents

Each impact is described in terms of its quality, significance, extent, duration and frequency and type, where possible. A 'Do-Nothing' impact will also be predicted in respect of each environmental theme in the EIAR. Residual impacts will also be presented following any impact for which mitigation measures are prescribed. The remaining impact types will be presented as required or where applicable throughout the EIAR. Any potential interactions between the various aspects of the environment assessed throughout the

EIAR will be presented in the 'Interactions of the Foregoing' chapter.

Environmental Impact Assessment Report Volumes

The EIAR shall comprise five volumes and will be accompanied by a Non-Technical Summary. The five volumes are as follows:

Table 1.3 EIAR Volumes	
Volume	Content
Volume 1	EIAR Non-Technical Summary
Volume 2	EIAR Main Text
Volume 3	EIAR Figures
Volume 4	EIAR Appendices
Volume 5	EIAR Landscape Figures

Volume 1 of the EIAR will contain a Non-Technical Summary, which will give a brief non-specialist outline of the project. Volume 2 will contain the main text of the EIAR. Volume 3 will contain the figures associated with the various Chapters in Volume 2 and Volume 5 will contains landscape photomontages associated with the Landscape and Visual Assessment Chapter. The appendices will be contained in Volume 4.

Environmental Impact Assessment Report Team

ABO Wind are managing and coordinating the production of the EIAR and have engaged a team of specialist and competent consultants to carryout baseline survey work and conduct impact statements. Table 1.4 provides a summary of the professional team and their area of contribution.

Table 1.4 Summary of Professional Team		
Consultant	Contribution	Chapter
ABO Wind Ireland LTD	Project Management Description of the development Alternatives, scoping and consultation Policy and Legislation Interactions of the foregoing	1, 2, 3, 4 and 17
BES	Biodiversity – Ornithology	5
Ecology Ireland	Biodiversity - Terrestrial ecology	6
Hydro Environmental Systems	Soils, Geology, hydrogeology and hydrology	7
AI Bridges	Material Assets – Telecoms and Aviation	8
Macroworks	Landscape and Visual Assessment	9

Table 1.4 Summary of Professional Team		
Consultant	Contribution	Chapter
ABO Wind Ireland LTD	Shadow Flicker	10
Irwin Carr	Noise Assessment	11
Dermot Neillis	Archaeology and Cultural Heritage	12
Roughan & O'Donovan	Transport and traffic assessment	13
Arcus Consulting Ltd	Population and Human Health	14
AWN Consulting Ltd.	Air Quality and Climate	15
Purser Talton	Forestry	16

5. Consultation

Scoping Consultation

EIA scoping seeks to facilitate a process of consultation with Statutory consultees, inviting them to identify any potential requirements, impacts or considerations that should be included during the preparation of the EIAR.

Accordingly, this Scoping Report is provided to all relevant Statutory consultees for their consideration and comment with regard to the proposed development of Keerglen Wind Farm.

Additional consultees can be added throughout the preparation of the EIAR and through discussions with the competent authority and statutory consultees as necessary.

Public Consultation

ABO Wind is committed to community engagement, which recognises the right of residents to have a meaningful role in developments that affect their community. A Community Liaison Officer (CLO) has been appointed for the Keerglen Wind Farm Project and has already commenced engagement with the local community. The purpose of the CLO is to introduce the project to the local community, engage and communicate with the local community in a timely and appropriate manner.

The CLO will share information and project progress updates with the local community as and when it is relevant to do so. Feedback and information received throughout the consultation process will be considered and is used to inform the design process.

Following initial feasibility work and once it was established that the project could proceed to the planning stage, the community engagement plan was developed. This plan set out the steps that would be taken in order to ensure that there was an open, transparent and two-way consultation process in place with the community from an early stage in the project.

6. Natura Impact Statement

Keerglen Wind Farm will be subject to the Appropriate Assessment (AA) screening process. The AA screening and, if required, a Natura Impact Statement will be prepared in accordance with the European Commission guidance document Assessment of Plans and Projects Significantly affecting Natura 2000 Sites: Methodological Guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC (EC, 2001) and the Department of the Environment's Guidance on the Appropriate Assessment of Plans and Projects in Ireland (December 2009, amended February 2010).

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

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 Licence 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 or Web gov.ie - Tree Felling Licences (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) 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)
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

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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)

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

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

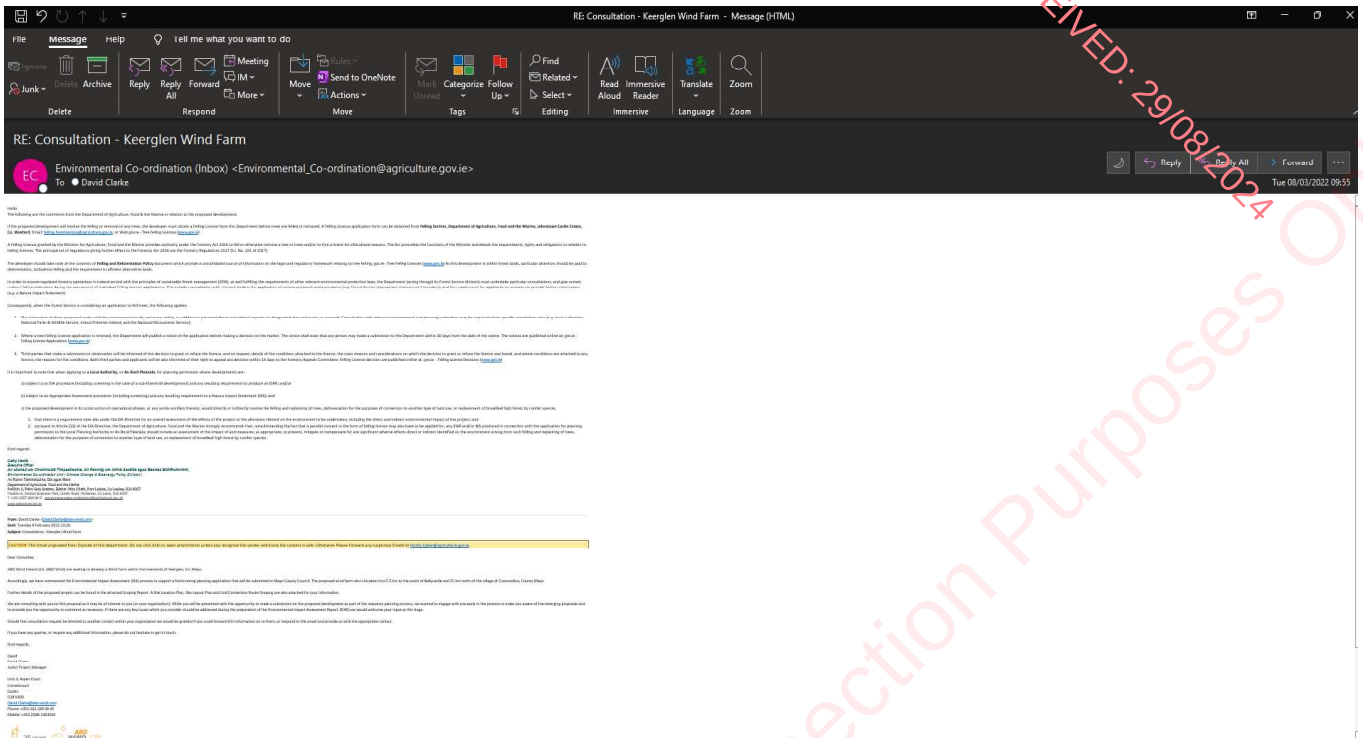
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Appendix 2.2 Keerglen Wind Farm Environmental Impact Assessment Report



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

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



Appendix 2.2

Keerglen Wind Farm Environmental Impact Assessment Report

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RECEIVED: 29/08/2024

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

Sent: Tuesday 8 February 2022 13:26

Subject: Consultation - Keerglen Wind Farm

[ATTENTION] This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

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

Phone: +353 (0)1 289 08 45

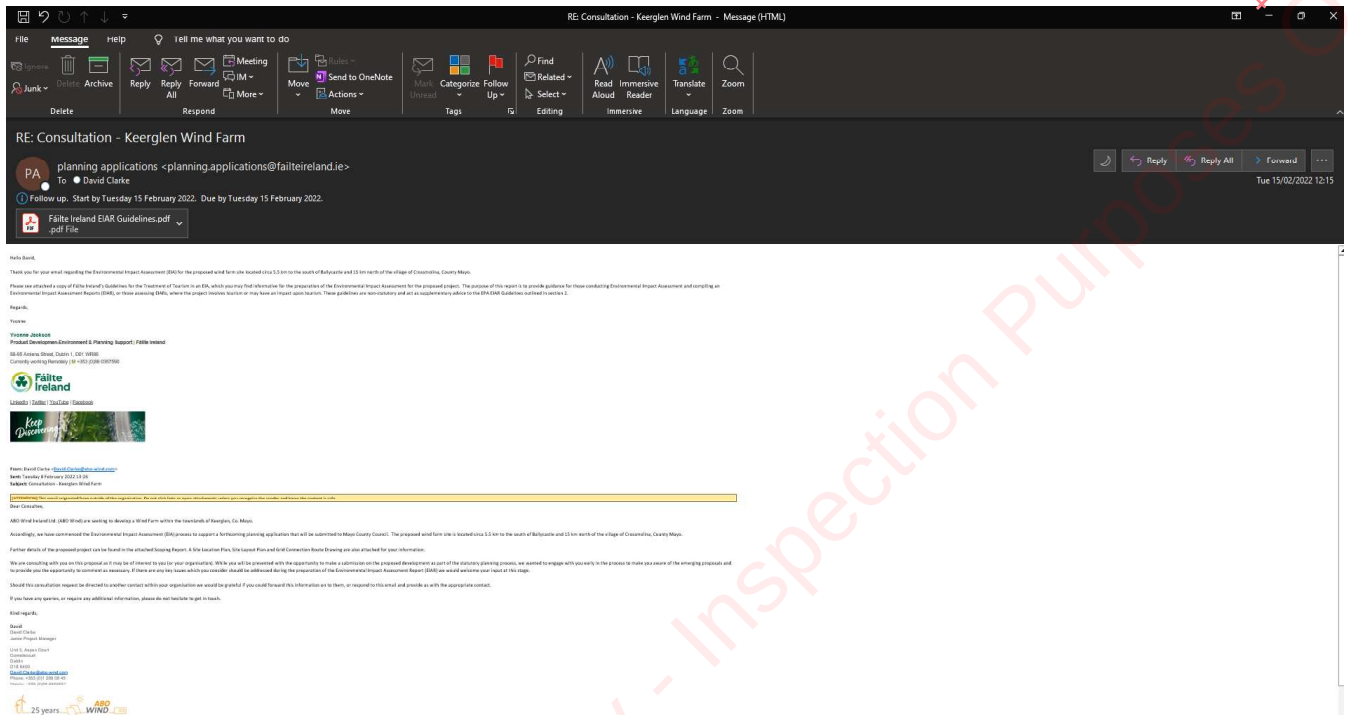
Mobile: +353 (0)86 2363564

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

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cillian.claffey@water.ie

www.water.ie

[Facebook](#) | [Twitter](#) | [LinkedIn](#)

RECEIVED: 29/08/2024
MAYO COUNTY COUNCIL
Planning Authority

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

Sent: Tuesday 8 February 2022 13:26

Subject: Consultation - Keerglen Wind Farm

CAUTION: This email originated from outside of your organisation. Do not click links or open attachments unless you recognise the sender and are sure that the content is safe.

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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

Phone: +353 (0)1 289 08 45

Mobile: +353 (0)86 2363564



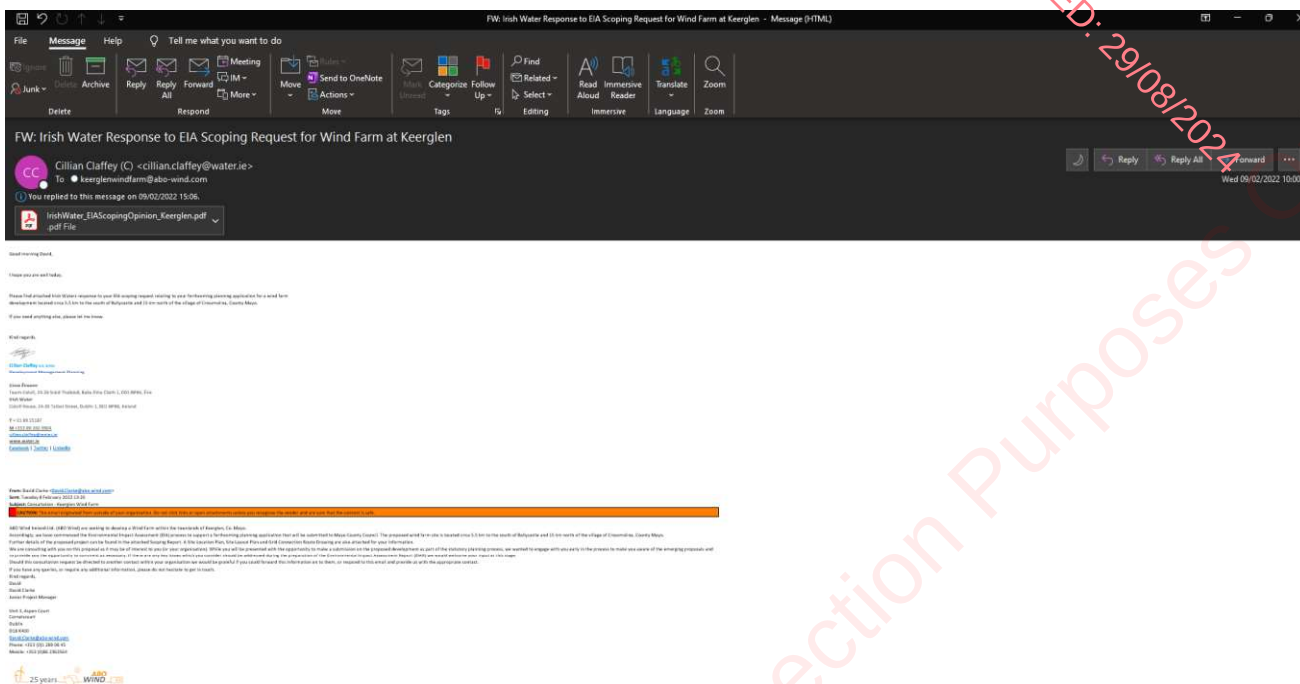
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Keerglen Wind Farm Environmental Impact Assessment Report

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Unit 3, Aspen Court
Cornelscourt
Dublin
D18 K400

9th February 2022

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

Yours sincerely,

Signed on behalf of Irish Water:

PP: Ali Robinson

Yvonne Harris
Connections and Development Services

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

Irish Water
PO Box 6000
Dublin 1
D01 WA07
Ireland

T: +353 01 89 25000
T: +353 01 89 25001
www.water.ie

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

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.

- 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.

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.

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

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

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

Appendix 2.2

Keerglen Wind Farm Environmental Impact Assessment Report

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

Phone: +353 (0)1 289 08 45

Mobile: +353 (0)86 2363564



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

From: GSI Planning <GSIPlanning@GSI.ie>
To: David Clarke
Cc: Clare Glanville; GSI Planning

22_34 Scoping Report for Keerglen Wind Farm Co Mayo.pdf
GSI datasets relevant to EIA & SEA_20210421.pdf

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.

Yours sincerely,

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Geological Survey Ireland

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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

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 glaciotectionic 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) for further information and possible mitigation measures if applicable.



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



Geological Survey
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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.

Yours sincerely,

Clare Glanville
Senior Geologist
Geological Survey Ireland

Geological Survey Ireland, Beggars Bush, Haddington Road, Dublin D04 K7X4, Ireland.
Suirbhéireacht Gheolaíochta Éireann, Tor an Bhacail, Bóthar Haddington, Baile Átha Claith D04 K7X4, Éire.
T +353 (0)1 678 2000 LoCall / LóGhlao 1890 44 99 00 www.gsi.ie Fáiltear roimh comhfhreagras i nGaeilge

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.

Geological Survey Ireland, Beggars Bush, Haddington Road, Dublin D04 K7X4, Ireland.

Suirbhéireacht Gheolaíochta Éireann, Tor an Bhacaigh, Bóthar Haddington, Baile Átha Cliath D04 K7X4, Éire.

T +353 (0)1 678 2000 **LoCall** / L6Ghlao 1890 44 99 00 www.gsi.ie *Fáiltear roimh comhfhreagras i nGaeilge*

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> 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.

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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

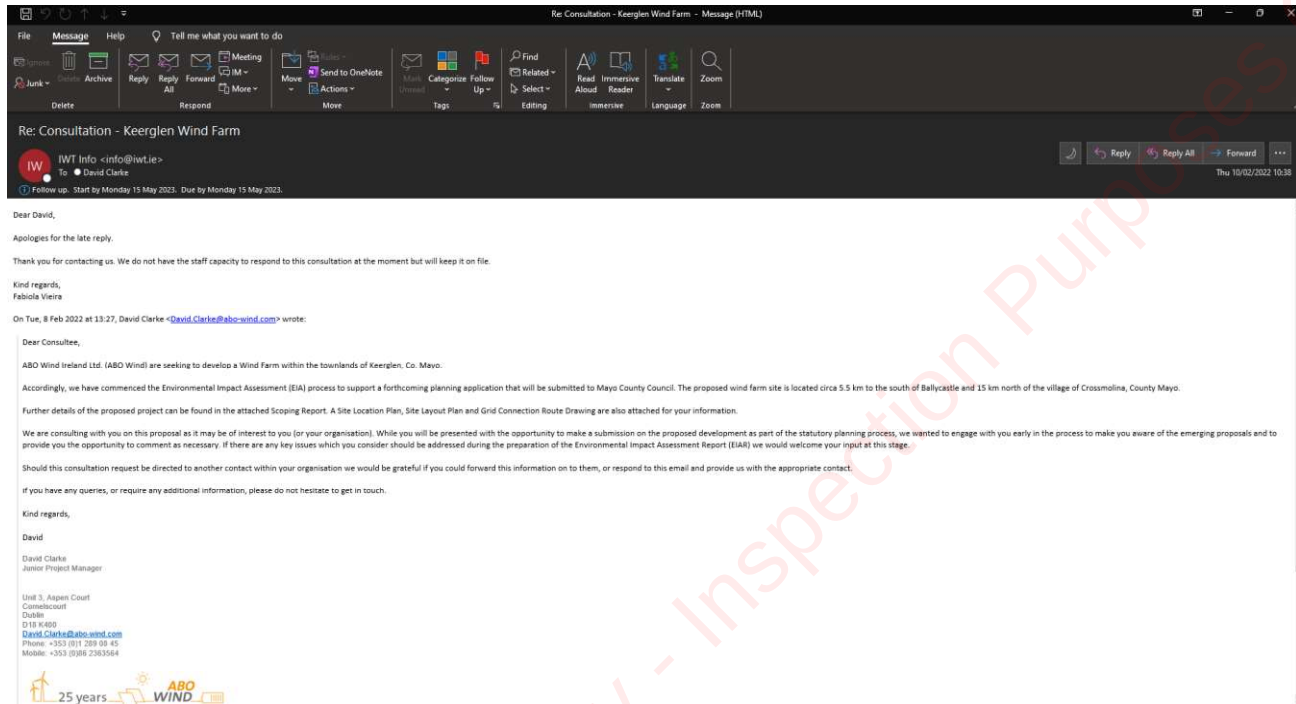
Unit 3, Aspen Court
Cornelscourt
Dublin
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David.Clarke@abo-wind.com
Phone: +353 (0)1 289 08 45
Mobile: +353 (0)86 2363564

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>
Sent: Tuesday 8 February 2022 13:26
Subject: Consultation - Keerglen Wind Farm

Dear Consultee,

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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.

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

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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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

From: David Clarke <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.

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.

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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



RECEIVED: 29/08/2024

Mr. David Clarke
ABO Wind Ireland Ltd
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 8th 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
24th 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
www.opw.ie

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

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.

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.

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

Kind regards,

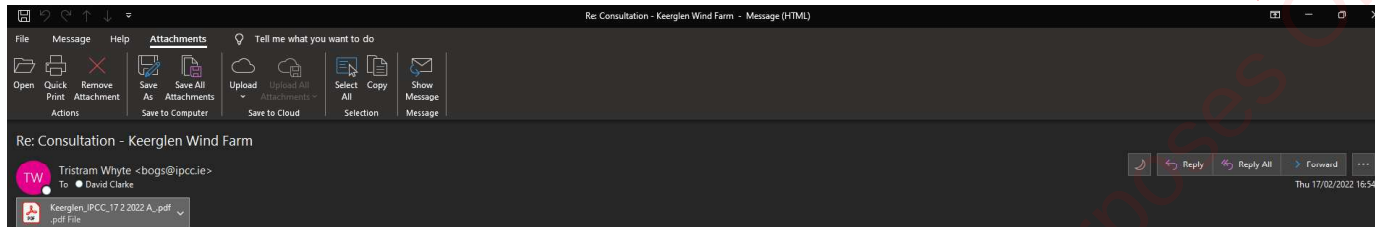
David
David Clarke

Appendix 2.2

Keerglen Wind Farm Environmental Impact Assessment Report

Junior Project Manager

Unit 3, Aspen Court
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D18 K400
David.Clarke@abo-wind.com
Phone: +353 (0)1 289 08 45
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IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNATHE PHORTAIGH NA HÉIREANN

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

Tel/Faill: +353-(0)45-860133
e-mail/niamhphost: 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. 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.

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 Comhlacht: 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). 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

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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 *Philonthus 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, 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) 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, Bolebrack 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

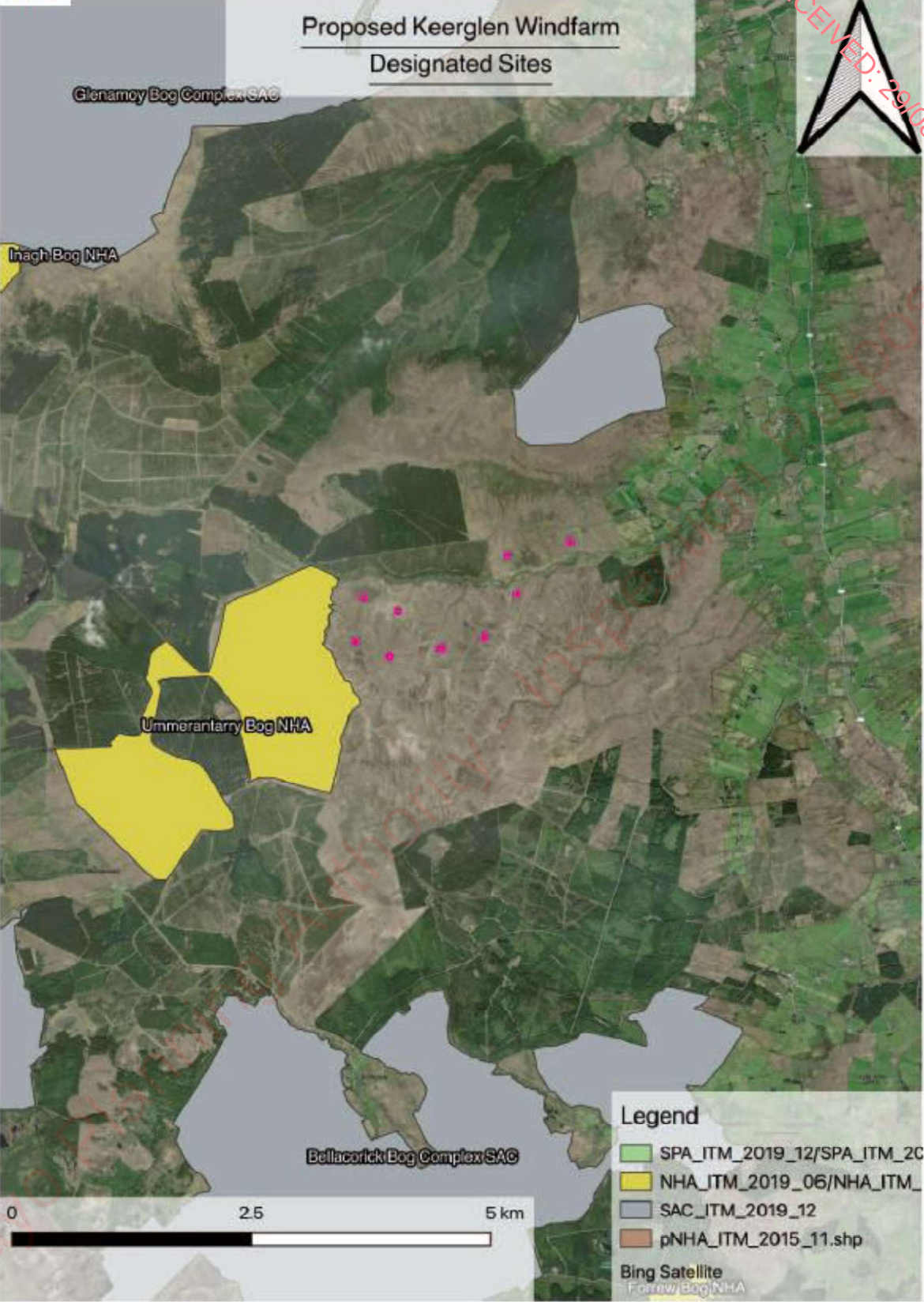
The distribution of breeding birds around upland windfarms, James W. Pearce-Higgins, Leigh Stephen, Rowena H. W. Langston, Ian P. Bainbridge and Rhys Bullman, 2009, Journal of Applied Ecology.

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

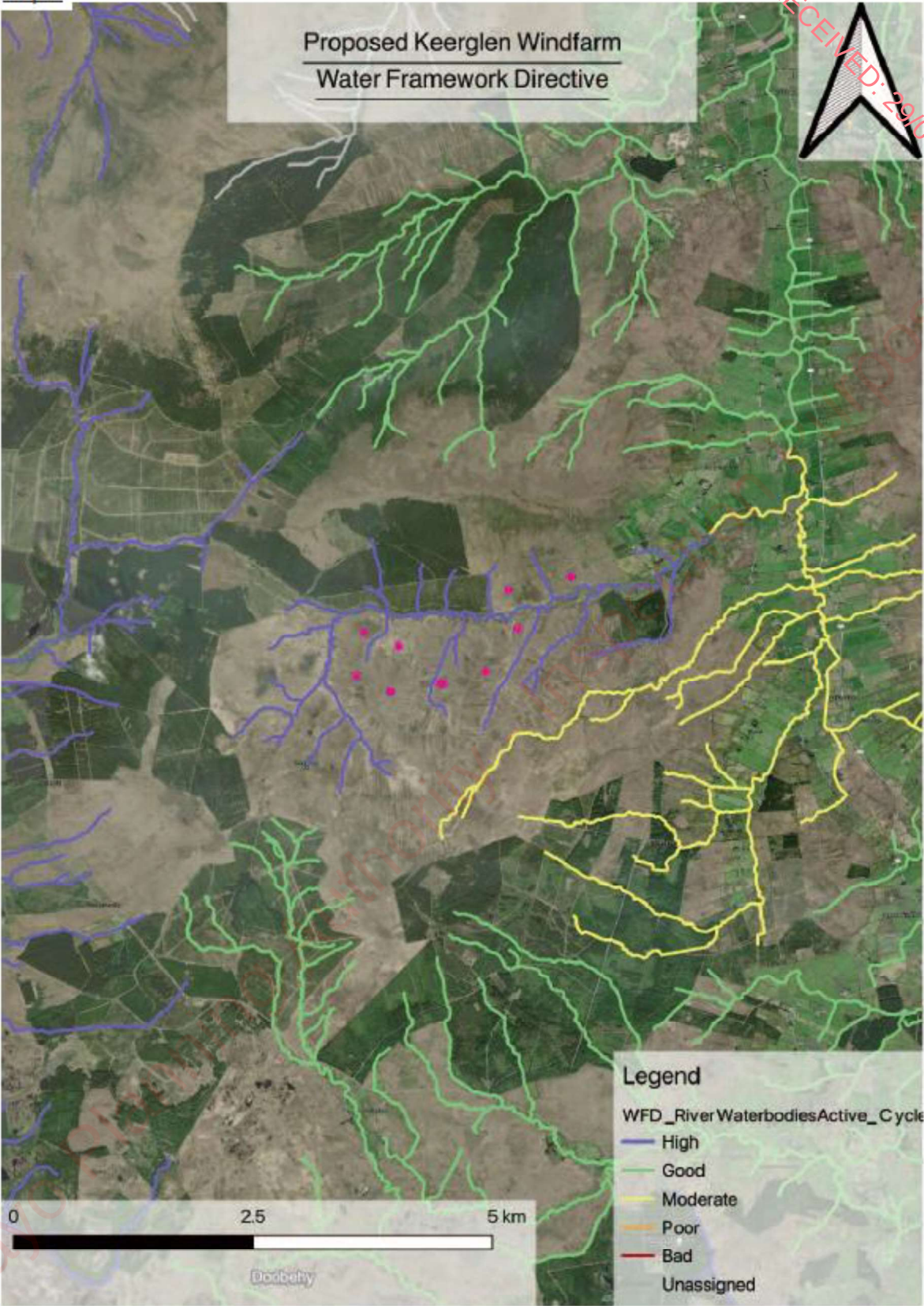
Ireland's Peatland Conservation Action Plan 2020, Sarah Malone B.A. Heritage Studies, Dr Catherine O'Connell, The Irish Peatland Conservation Council, 2009.

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.

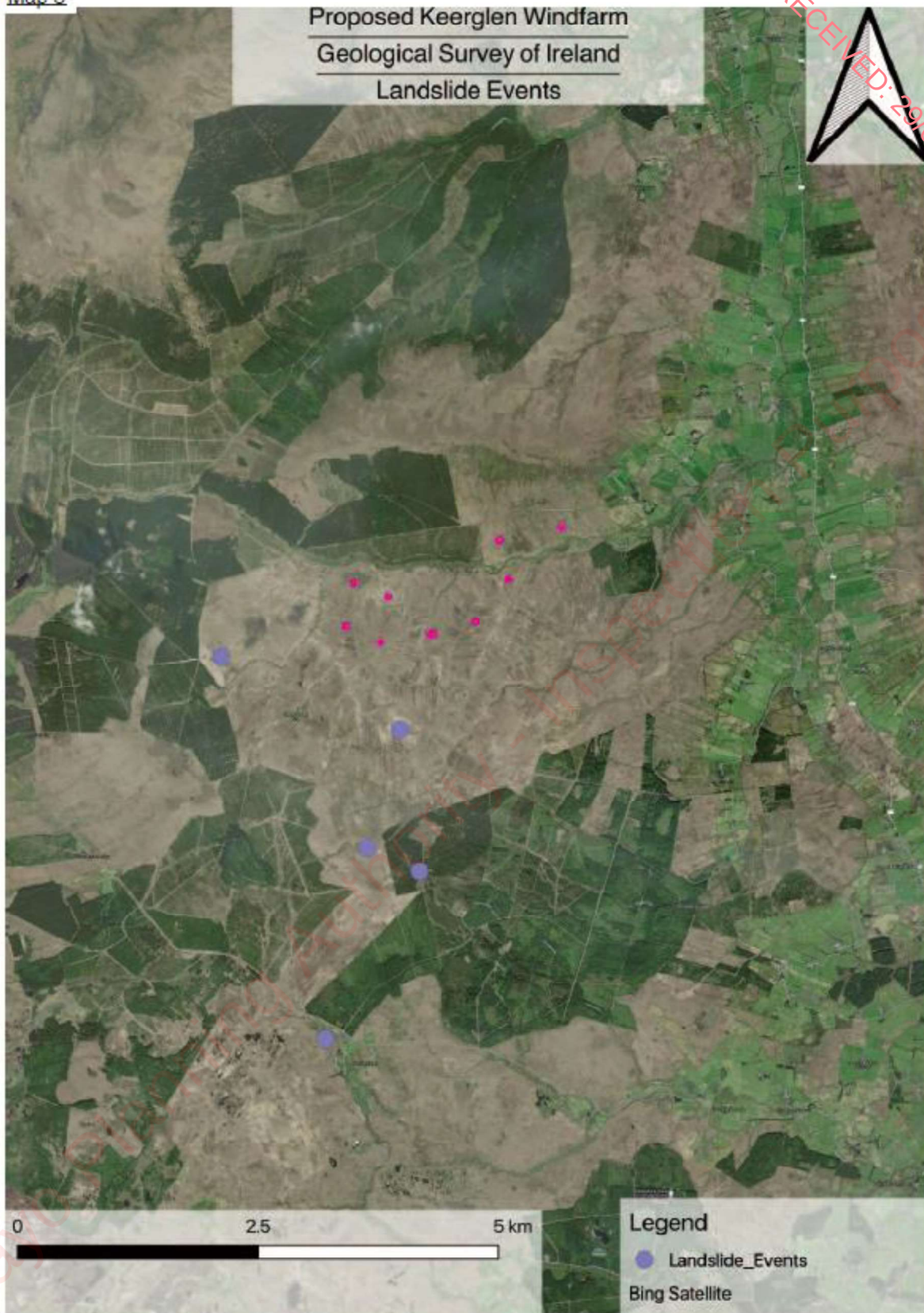
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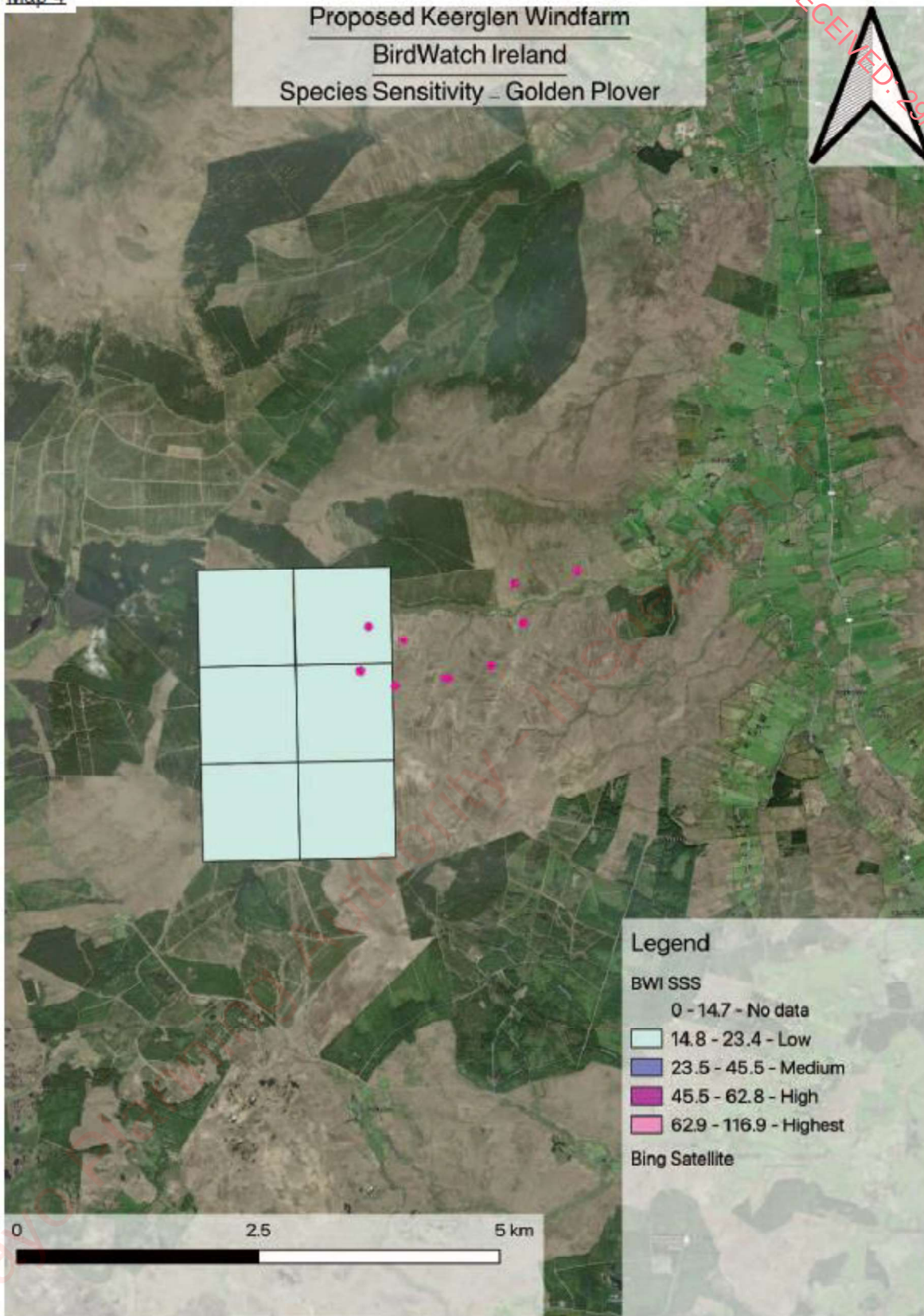
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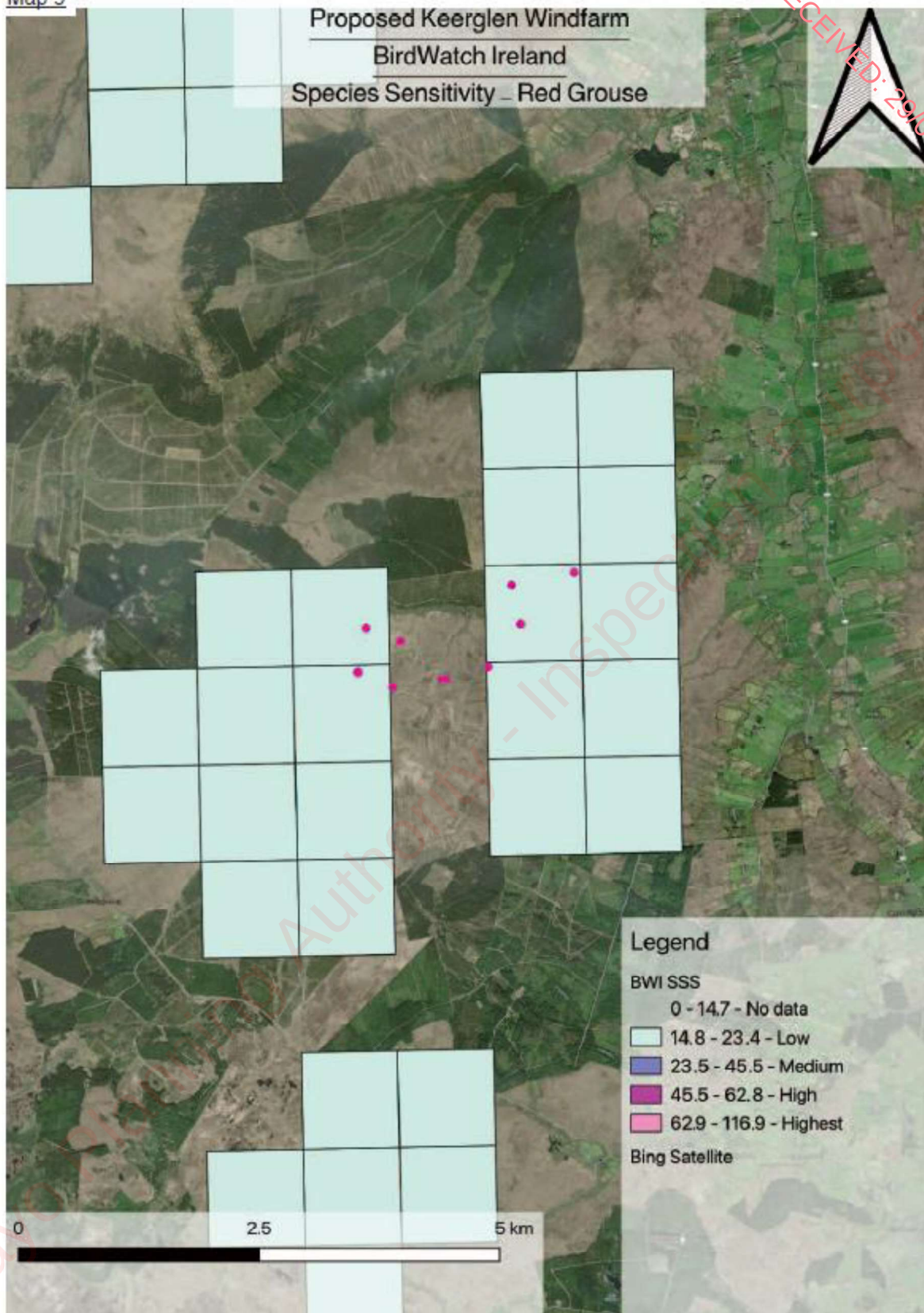
Map 3



Map 4



Map 5



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,

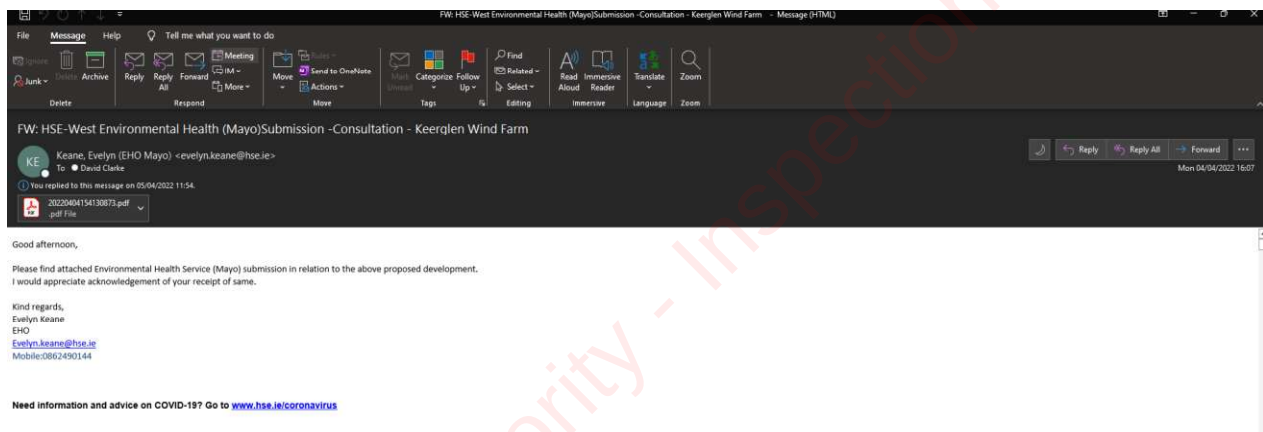
Evelyn Keane

EHO

Evelyn.keane@hse.ie

Mobile:0862490144

Need information and advice on COVID-19? Go to 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) who will refer your query to the appropriate person.

Yours sincerely

Maria Horkan
Principal Environmental Health Officer

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

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

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 [20202No. 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

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

Appendix 2.2

Keerglen Wind Farm Environmental Impact Assessment Report

- 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.

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.

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

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

- 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.

Appendix 2.2

Keerglen Wind Farm Environmental Impact Assessment Report

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

Appendix 2.2

Keerglen Wind Farm Environmental Impact Assessment Report

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.

Regards

Diarmuid

Diarmuid Buttimer

Executive Officer

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreacht

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

Manager.DAU@housing.gov.ie

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

Sent: Tuesday 8 February 2022 13:26

Subject: Consultation - Keerglen Wind Farm

CAUTION: This eMail originated from outside your organisation and the BTS Managed Desktop service. Do not click on any links or open any attachments unless you recognise the sender or are expecting the email and know that the content is safe. If you are in any doubt, please contact the OGCIO IT Service Desk at help.it@per.gov.ie

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

Phone: +353 (0)1 289 08 45

Mobile: +353 (0)86 2363564



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

Message Help I tell me what you want to do

File Message Help I tell me what you want to do

File Message Help I tell me what you want to do

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)

A Chara

I acknowledge receipt of your recent consultation.

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If you have not heard from DAU and wish to receive an update, please email manager.dau@housing.gov.ie.

Regards
Diarmuid

Diarmuid Buttner
Executive Officer
An Roinn Tithíochta, Rialtais Ábúil agus Oidhreacht
Department of Housing, Local Government and Heritage
Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifig an Rialtais
Government Offices
Bóthar an Bhailí Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Westford, County Westford, Y35 AP90
Diarmuid.Buttner@housing.gov.ie
Manager.DAU@housing.gov.ie

From: David Clarke <David.Clarke@abo-wind.com>
Sent: Tuesday 8 February 2022 13:05
Subject: Consultation - Keerglen Wind Farm

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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

RECEIVED: 29/08/2024

Appendix 2.3

Community Report

Keerglen Wind Farm

August 2024

Mayo Planning Authority - Inspection Purposes Only



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2 Near Neighbour and Stakeholder Mapping 4

3 Community Engagement Plan 5

4 Feedback from consultation 7

5 Community Benefit Fund..... 9

6 Conclusions and Post Planning Engagement..... 9

1 Introduction

This Community Report has been prepared in line with the requirements set out in the *Draft Wind Energy Development Guidelines 2019*¹ (DWEDG).

Section 4.3.2 of the DWEDGs highlights 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. Section 4.3.2 also sets out what should be included in the Community Report –

- A map of the proposed project and the communities in the vicinity of the proposal within a radius of up to approximately 10 km of the turbines, depending on the circumstances of the case
- The steps taken by the applicant seeking planning permission for the wind energy development to seek out the views of relevant communities in developing the project
- A summary of the responses received as a result of the engagement process and a statement of any principal design adjustments or modifications undertaken in response to the feedback of the community before the project was submitted for planning permission;
- Proposed details as regards the steps to be taken to ensure that the proposed development will be of enduring economic benefit to the communities concerned, through the negotiation of a form of community investment/ownership, benefit or dividend;
- Demonstrate how the proposed development will adhere to the Code of Practice for Wind Energy Development in Ireland Guidelines for Community Engagement issued by the Department of Communications, Climate Action and Environment (2016) (or any subsequent replacement Code of Practice).

The above points have been reflected in the structure and content of this report.

The Community Report has also been informed by other relevant guidance and best practise documents including –

¹ Department of Housing, Planning and Local Government (2019) Draft Revised Wind Energy Development Guidelines

- Code of Practice for Wind Energy Development in Ireland²
- GP Wind – Good Practice Guide³
- Best Practice Guidelines for the Irish Wind Energy Industry⁴

2 Near Neighbour and Stakeholder Mapping

The first step of the community engagement process was to map out all of the closest “near” neighbours to the project. See maps of near neighbour properties below.

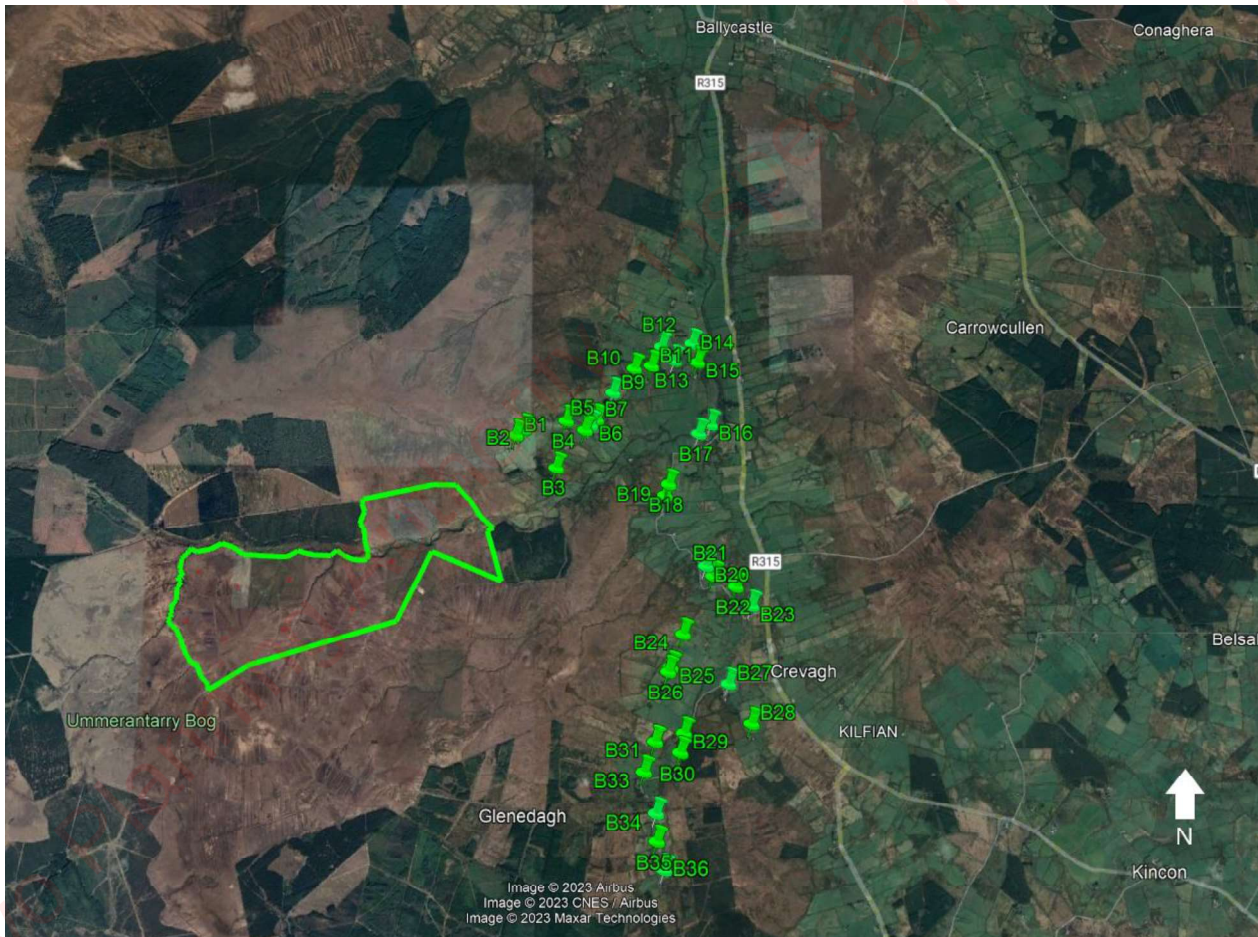


Figure 1: Map of Near Neighbour Properties

² Department of Communications, Climate Action and Environment (2016) Code of Practice for Wind Energy Development in Ireland Guidelines for Community Engagement

³ Good Practice Wind (2012) Good Practice Guide

⁴ IWEA (2012) Best Practice Guidelines for the Irish Wind Energy Industry

A stakeholder mapping exercise was then carried out which focused on the study area around Keerglen Wind Farm. It was considered that a study area of 3.5km around the wind farm site would be appropriate as this would take in the dwellings in closest proximity to the proposed wind farm development. This was a desk-based study which was used to identify the key community groups, members of the community, and elected representatives in the area.

The above information informed and helped develop the community engagement plan which is set out in the following section.

3 Community Engagement Plan

3.1 Purpose of the Community Engagement Plan

ABO Energy is committed to community engagement, which recognises the right of residents to have a meaningful role in developments that affect their community. Following initial feasibility work and once it was established that the project could proceed to the planning stage, the community engagement plan was developed. This plan set out the steps that would be taken in order to ensure that there was an open, transparent consultation process in place with the community from an early stage in the project.

3.2 Door to Door

On the 24th November 2021, ABO Energy employees had the opportunity to call to the 'near' neighbour properties identified in Figure 1. The purpose of the door to door was to introduce the project team and the emerging proposals, answer any resident questions and address any initial concerns. It was considered extremely important to establish contact with the near neighbours as a priority as these are the people that would be most impacted by the proposals. Each household was given a newsletter which contained key project details including the website address and contact details for the Community Liaison Officer (CLO). A copy of the newsletter is included in Annex A. In the event that there was no-one at home, a newsletter was left in a post box or secured in a prominent position.

3.3 Launch of project website

On the same day as the door to door commenced, the project website www.Keerglen-windfarm.com went live. The website initially contained the same key project information as the newsletter but was regularly updated with news and information at the various stages throughout the project's evolution.

3.4 Calls and emails to councillors

Prior to the door to door, on the 22nd November 2021 contact via e-mail was made with the 7 no. elected Councillors for Ballina Local Electoral Area. This e-mail sought to make the Councillors aware of the emerging proposals, outlining ABO's intention to meet with the local community via a door knock exercise in the following days. The e-mail also sought to facilitate a meeting or phone call with all Councillors following the completion of the 'near' neighbour door knock exercise. A copy of this email and a subsequent follow up email on the 26th November 2021 are included in Annex B.

Following the door to door with local residents, another email was sent to councillors, outlining that the door knock had been successfully carried out and inviting them to attend a MS Teams meeting. There was no response from councillors to arrange a virtual MS Teams meeting. All Councillors were continually updated as the project progressed with the Community Liaison Officer on hand to respond to any of their further queries.

3.7 Ongoing project updates to local residents, wider community and community groups

In June 2023, a second project newsletter was given to the near neighbour residents to the wind farm on a second 'door knock'. The project newsletter was also posted on the project website. The newsletter was distributed to all local Councillors and stakeholders. The second project newsletter gave an update on the progress of the wind farm and grid connection and outlined that a public exhibition event would be held in the coming weeks, which would provide further details pertaining to the proposed project and give people living in the local area to meet the project team and have them answer any questions about the proposed project. The second project newsletter is included in Annex C. People were encouraged to get in contact via letter, phone, email or virtual meeting.

3.8 Public Consultation Event:

Accordingly, on the 13th and 20th of June 2023 an advertisement was published in the Western People (Annex E) and on the project website highlighting and providing details to attend the Public Consultation of the proposed Keerglen Wind Farm Development. On the 19th June, e-mails alerting people to the event were also sent to all local Councillors (Annex D) and stakeholders and all those who had joined the project mailing list.

The Public Consultation Event took place in Ballycastle Community Hall in Ballycastle, County Mayo on the Wednesday 21st of June between the hours of 4pm – 8pm. Members of the Project Team were on hand and answered any questions about the project. 35 people attended the Public Consultation Event.

Annex F includes photos of the public consultation event space, illustrating the content that could viewed by participants.

4 Feedback from consultation

Below are the primary comments that were received throughout the consultation process:

Topic	Issue Raised	Issue Considered/Addressed
Wind Farm Noise	Potential effect on residential amenity	It is stated in the 2006 WEDGs that “in general, noise is unlikely to be a significant problem where the distance from the nearest turbine to any noise sensitive property is more than 500 metres”. There have also been great advancements in turbine design and technology which means that wind turbines are significantly quieter than previously, and continue to improve with every new model that comes onto the market. The minimum setback distance from houses of 500m was applied throughout the evolution of the wind farm layout and this relates to only landowners involved in the project. All properties that are not involved in the project are located a minimum of 1.5km away from the nearest turbine. Accordingly, the predicted turbine noise levels associated with the Keerglen Wind Farm are predicted to be well within the best practice noise criteria curves recommended in the 2006 WEDGs. Further details on this can be found in the Noise Impact assessment in Chapter 12 of the EIAR.
Visual Impact of Wind Farm	Potential effect on residential amenity and views	A setback distance of 600m was applied to all uninvolved residential properties in accordance with the 2019 DWEDGs which recommend a minimum setback of 4 times the tip height of proposed turbines to protect residential amenity. Visual impacts were assessed at 23 viewpoint locations representing a range of receptor types, viewing distances and viewing angles. A large proportion of these receptors were classified with a medium-low visual receptor sensitivity which further highlights the robust nature of the study area. Of the 23 views, 18 are deemed to have an

		impact significance in the lower order ranging from medium to medium low which principally reflects the landscape context of the study area, where the turbines will not appear over-scaled nor out of place. Further details on this can be found in the Landscape and Visual Impact assessment in Chapter 10 of the EIAR.
Shadow Flicker	Potential effect of shadow flicker	Shadow flicker occurs when the shadows cast by the blades of a wind turbine fall over a residential home. For the people inside the house the natural light coming in a window facing the turbine can be blocked by the shadow of the blades. Since the blades are turning rapidly this creates a flicker effect with the natural light being blocked and unblocked every couple of seconds. This only happens in rare circumstances where the sun is shining at a low angle – just after dawn and before sunset – and where the turbine is directly between the residential home and the sun. This issue was considered as part of the environmental impact assessment process and the proposed layout conforms with the 2006 WEDGs i.e. a maximum 30 minutes of shadow flicker per day or 30 hours per annum at any sensitive receptor by management of the operation of the turbines during periods when there is a potential for shadow flicker. However, in accordance with emerging best practice and the 2019 DWEDGs, the project is committed to eliminate shadow flicker through the management of turbine operations. Further details on this can be found in the shadow flicker assessment in Chapter 11 of the EIAR.
Property Values	Potential effects of the project on property values in the area	There are a number of wide-ranging international studies that consider potential effects of wind farms on nearby property values. Through all of this research there is no definitive evidence either way that wind farms lower property prices or equally that they have no impact on property prices. Ultimately, it is a highly subjective topic. It is understandable that for people who do not like wind turbines, they will not want to live near them. There are however other people who do not mind or even like them, and are happy to live in a community which receives some benefit from the development which can provide funding for their children's schools, local clubs and amenities etc.
Community Benefit Fund	Questions around how the community benefit	The community benefit fund will be arranged in accordance with current best practice and will be informed by any new government guidelines. ABO Energy will be engaging with the local community post planning to inform the governance structure of the fund and the aims and

	fund would be structured.	objectives of the scheme. Further details on this can be found in the following sections of this report.
--	---------------------------	--

5 Community Benefit Fund

ABO Energy commit to contribute €2/MWh to a Community Benefit Fund for the first 15 years of operations. For a circa 40MW project, this would be in the region of €180,000⁵ per year. This fund will be set up and administered by an independent third party with significant input and representation from the local community.

The Community Benefit Fund will broadly operate in line with the specifics of the Renewable Electricity Support Scheme (RESS 1). The emerging Good Practice Principles Handbook due to be published by the DoECC in July 2021 will further be adhered to.

If the project receives all the necessary consents required to facilitate the construction of Keerglen Windfarm, the fund will be opened and widely advertised in the locality during the construction phase of the project. The first payments will be made from the fund during the first year of operation.

6 Conclusions and Post Planning Engagement

ABO Energy is committed to community engagement and has consulted with local residents and community groups throughout the pre-planning stage of the project. ABO Energy intends to continue consultations, to disseminate information and engage with the community throughout the construction and operations periods, should the application be granted. The following measures are proposed post planning stage:

- The Community Liaison Officer (CLO) will continue to be accessible to the local community from the construction to the commission stages to allow for dialogue and communication and to keep the public informed about the progress of the project.

⁵ *This is an indicative figure at this stage and will depend upon the final generation capacity of Keerglen Wind Farm. The figure can be influenced by a number of factors, including the number of turbines which receive planning permission, the type of turbine used on site and wind conditions in any given year etc

- The applicant will roll out a community benefit fund and work with members of the local community to successfully implement the fund, and ensure it meets the needs of the local community.

Effective stakeholder and community engagement and public consultation is a cornerstone for a successful wind energy development. ABO Energy have endeavoured to carry out continuous, proactive community engagement, and will continue to do this should the project progress.

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Annex A

November 2021 Newsletter

Mayo Planning Authority - Inspection Purposes Only



View of the site from an internal road

Keerglen Wind Farm Project Newsletter No.1

November 2021

Introduction

ABO Wind Ireland Limited are at an early stage of developing a wind farm proposal in your local area within the townland of Keerglen, Co. Mayo.

We want to ensure there is open, transparent and two-way communication with the closest neighbours of the project from the outset. We are therefore calling to all houses in the immediate vicinity (circa 1.5km) of the wind farm site to introduce ourselves and answer any initial questions or concerns that people may have about the project.

Throughout the development process you will have the opportunity to ask questions and provide feedback to the ABO Wind Ireland Community Liaison Officer. This will help shape the proposals and allow us to explore ways in which the project could bring benefits to the local community.

Who are ABO Wind?

ABO Wind Ireland are based in Cornelscourt Co. Dublin. We develop, construct and operate wind farms in the Republic of Ireland. We currently have a number of wind farms in development across the country, one wind farm in construction in Co. Donegal, and four operational wind farms in counties Tipperary, Wexford and Laois.

We are part of the larger ABO Wind Group based in Germany who develop wind, solar and bioenergy projects in 16 countries across four continents.

Why wind energy?

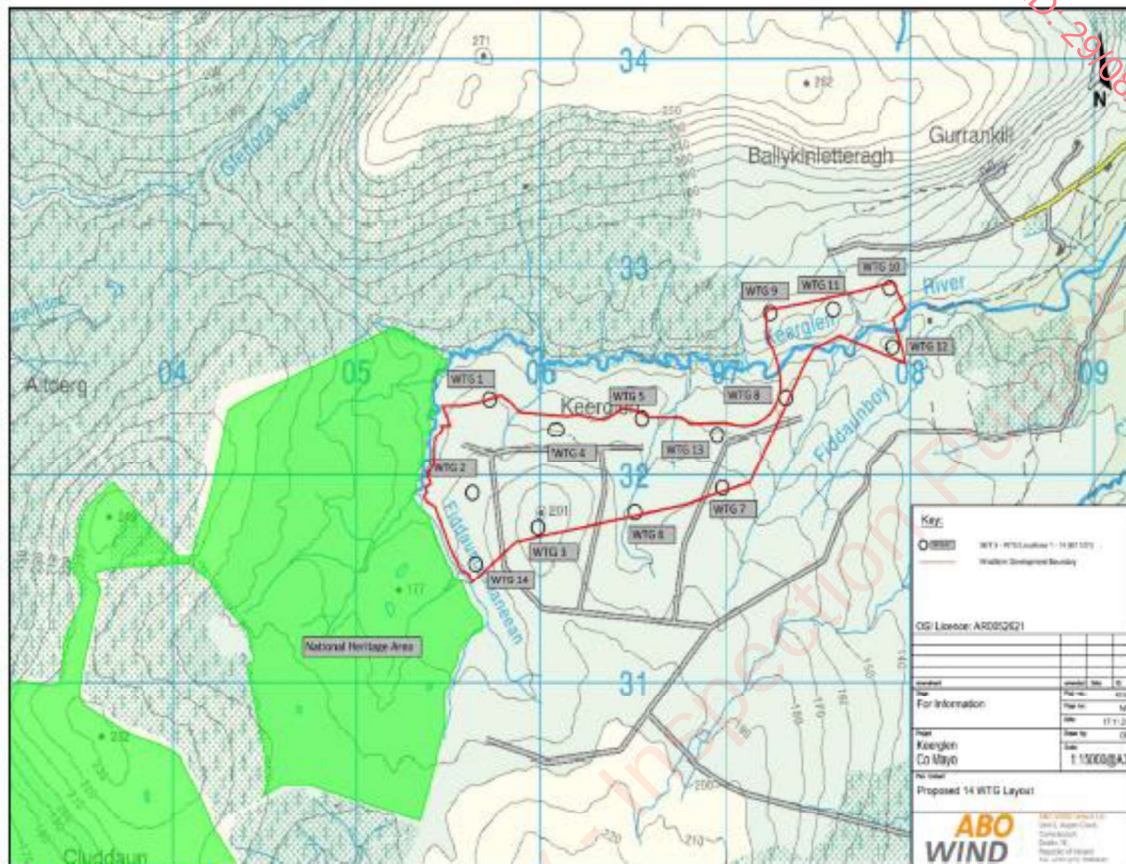
It is widely acknowledged that climate change is a very real threat to our society and that we must take immediate action to reduce our greenhouse gas emissions. One of the key ways to do this, as identified by the Government's Climate Action Plan 2021, is to reduce our reliance on fossil fuels such as coal, peat and gas and increase the share of renewables providing us with our electricity from 40% in 2020 to 80% by 2030. In order to reach this target, the Climate Action Plan states that we require approximately 8GW of onshore wind to be installed. There is approximately 4GW of installed onshore wind capacity in Ireland.

Therefore, a significant increase in the amount of onshore wind is required to meet our climate change objectives. As Ireland's largest renewable electricity resource, onshore wind further brings the added benefit of being the cheapest form of electricity for consumers across the island.

Site Selection

The proposed wind farm site falls within the 'Tier 2 – Open for Consideration', and 'Priority Areas' categories in the Mayo Wind Energy Strategy (2011-2020) as set out in the Mayo County Development Plan 2014-2020 (as varied). Wind farm developments are preferred in 'Priority Areas' while 'Tier 2 – Open for Consideration' identifies areas which may be considered for wind farms 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 for the Council.

Over the past months, we have carried out some early stage feasibility and constraints studies in order to establish whether the Keerglen site would be a suitable location for a wind farm. These studies included a landscape and visual assessment, ornithology and ecology surveys. Following a detailed review of the preliminary findings, no problematic sensitivities were revealed and we believe that the site has the capacity to accommodate approximately 14 wind turbines.



Site Boundary Map (Red Line)

Environmental Impact Assessment Report and Planning Application

Over the coming months we will be carrying out more detailed environmental studies across the site including ecology/ ornithology, geology and hydrology, landscape and visual, shadow flicker, noise, archaeology, traffic and transport, air quality, forestry, population and human health, and telecommunications in order to ensure that the proposed development will not have an adverse effect on the local environment or on people living in the area.

These studies will be compiled into an Environmental Impact Assessment Report (EIAR) which will be submitted along with a planning application to Mayo County Council. We are currently targeting submitting the planning application and the EIAR in mid 2022.

Community Benefit Fund and Community Investment

If the project receives planning permission and is constructed, ABO Wind will set up a community benefit fund. This will benefit communities living closest to the wind farm. This fund can be tailored to meet the needs of the local community and we are happy to take on board any ideas or suggestions relating to the fund.

Contact Details

Community Liaison Officer – David Clarke
Email – keerglenwindfarm@abo-wind.com
Direct phone number – 01 289 0845
Website – www.keerglen-windfarm.com

We have set up a project website that we will keep up to date with project information and news. There will also be a forum on the website where you can ask questions about the project and provide us with your views.

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Annex B

Councillor E-mail (November
2021)

Keerglen Wind Farm

From: David Clarke

Sent: Monday 22 November 2021 12:07

To: 'dara.calleary@oireachtas.ie' <dara.calleary@oireachtas.ie>; 'cllramreape@MayoCoCo.ie' <cllramreape@MayoCoCo.ie>; 'jmunnelly@cllr.mayococo.ie' <jmunnelly@cllr.mayococo.ie>; 'johara@cllr.mayococo.ie' <johara@cllr.mayococo.ie>; 'cllrmarkduffy@mayococo.ie' <cllrmarkduffy@mayococo.ie>; 'cllrmloftus@gmail.com' <cllrmloftus@gmail.com>; 'sweir@cllr.mayococo.ie' <sweir@cllr.mayococo.ie>

Cc: Emmet Egan <Emmet.Egan@abo-wind.com>; Gary Magee <Gary.Magee@abo-wind.com>

Subject: Engagement Regarding Wind Farm Proposal in the Ballina LEA

Dear Councillors,

I hope you're all keeping well during this time.

My name is David Clarke. I work as a Junior Planning and Development Manager with ABO Wind Ireland Ltd. Emmet Egan, Director of ABO Wind Ireland Ltd is also copied into the correspondence. We develop, construct and operate wind farms in the Republic of Ireland.

It is widely acknowledged that climate change is a very real threat to our society and that we must take immediate action to reduce our greenhouse gas emissions. As identified in the Climate Action Plan 2021, one of the ways to do this is to reduce our reliance on fossil fuels such as coal, peat and gas and increase the share of renewables providing us with our electricity from 40% in 2020 to a target of 80% by 2030. In order to reach this target, the plan states that we require approximately 8GW of onshore wind to be installed, there is currently approximately 4GW of installed onshore wind capacity in Ireland. Onshore wind is Ireland's largest and cheapest renewable electricity resource (SEAI, 2019) and as such will continue to play an integral role in decarbonising our society.

ABO Wind currently have a number of wind farms in various stages of development across the country including one in construction in Co. Donegal. ABO Wind have built out four wind farms in counties Tipperary, Wexford and Laois. ABO Wind also have an upcoming project at Sheskin, Bellacorick. This project has RESS 1 support and is expected to commence construction next year.

We are currently in the early stages of developing a wind farm proposal in the Ballina Local Electoral Area. As a Councillor for this area we would like to engage with you to introduce ourselves and outline our proposals.

However, in the first instance we feel that it is imperative that we discuss the project with the residents who are closest to the proposed project. As such, we will provide you with the location and details of the project on a call after we have initially engaged with all houses in the immediate vicinity (circa 1.5km) of the wind farm site to introduce the project, and answer any initial questions that people may have.

We are intending to visit these closest residences this week and this will be done in a COVID secure manner. This will involve a door knock at each of the properties where we will remain outside at a minimum distance of 2m from the resident. We will be wearing face masks and will limit the time spent with residents. We will provide residents with introductory literature to the project and answer their initial questions. They will be provided with contact details should they wish to follow up with any further questions.

Following this we would like to arrange a virtual meeting with you on Friday 26th November to discuss the proposal at a time of your collective convenience.

Please let us know if you would be available for an MS Teams call on this date and your available times. We can then coordinate a call at a time that suits all parties.

Many thanks in advance.

Kind Regards,

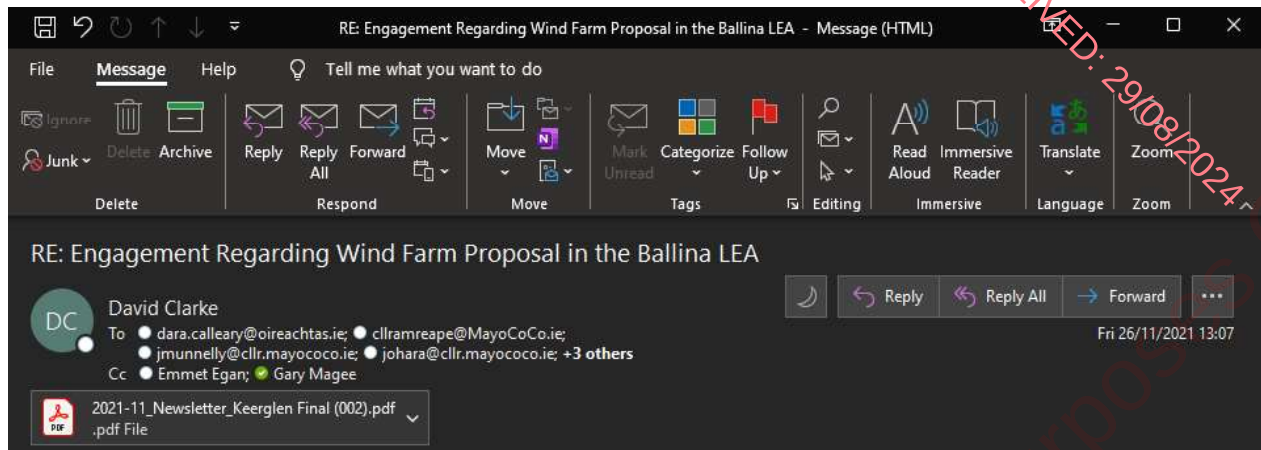
David

David Clarke
Junior Project Manager
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Phone: +353 (0)1 289 08 45
Mobile: +353 (0)86 2363564



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Dear Councillors,

Following on from my email of Monday 22nd November, as an update we met with all residents living in the immediate vicinity of the proposed Wind Farm Site during the course of this week. During the meetings we presented our proposals and answered all of their initial queries. We also provided contact information so they can get in touch with us in the future and keep abreast of project updates. Residents were provided with a copy of the 1st Project Newsletter which I attach for your information.

I'm sure you're all very busy at the moment and appreciate that you were unable to meet today to discuss the proposals. In light that of this, could I propose an alternative date for a virtual MS Teams meeting next Tuesday 30th November or Wednesday 1st December (afternoon)?

Please let us know if you would be available on these days and your preferred times. We will then try and coordinate a call at a time that suits all parties.

Many thanks in advance.

Kind regards,

David
David Clarke
Junior Project Manager

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



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Annex C

June 2023 Newsletter

Mayo Planning Authority - Inspection Purposes Only

Keerglen Wind Farm Project Newsletter No.2

June 2023

Introduction

ABO Wind Ireland Limited (ABO Wind) are developing a wind farm proposal in your local area within the townland of Keerglen, Co. Mayo.

Since launching our project proposals back in November 2021, we have spoken with members of the community living in the immediate vicinity of the proposed wind farm site as well as other interested individuals to discuss the proposals and address any initial comments or concerns.

We are sending out this project update newsletter to ensure that people in the community are kept informed as to the progress of the Keerglen Wind Farm proposals, and to ensure there is an opportunity for the local community to communicate directly with ABO Wind throughout the development process.

We will be facilitating an event to provide information on the project. This will take place through a public consultation in Ballycastle Community Hall on Wednesday the 21st of June 2023. The event will take place from 4-8pm. Further details are provided at the bottom of this newsletter.

Once you have had the opportunity to review this newsletter, should you require additional information on any element of the project please feel free to make contact with the Community Liaison Officer at a time of your convenience using the contact details provided overleaf.

Please be assured that we will continue to make every effort possible to ensure that we address any concerns that you may have and provide you with the information you need in order to fully understand the details of this proposed project.

Why this Site?

Several factors need to be taken into account when determining the suitability of a site for a prospective Wind Farm development. The Keerglen Wind Farm site is deemed suitable for the following primary reasons:

- ▶ It is designated within the "Tier 1 – Preferred and Tier 2 – Open for Consideration" categories in the Renewable Energy Strategy (RES) for County Mayo 2011-2020. Tier 1 – Preferred means that potential for wind farm development is greatest in these designated areas. Tier 2 Open for Consideration means that wind farm developments may be considered appropriate subject to detailed environmental assessment.
- ▶ Is not subject to any environmental designation i.e. it is not located within a Special Area of Conservation, a Special Protection Area or a Natural Heritage Area.
- ▶ Landscape and visual impact studies indicate that the site has the suitability of accommodating a Wind Farm development of this size.
- ▶ It benefits from good annual average wind speeds.

View of the site from an internal road



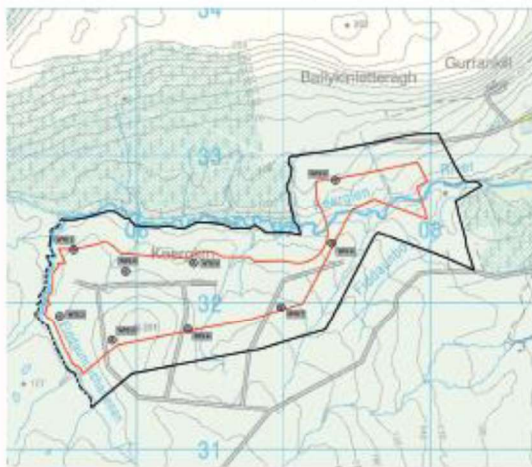
www.keerglen-windfarm.com

**ABO
WIND**

Current Layout

In November 2021 we publicised the preliminary site layout for consultation with the local community. As outlined at that time, following initial feasibility studies we considered that the site had the capacity to accommodate up to 14 wind turbines.

Over the last 18 months, we have continued to carry out more detailed planning and environmental assessments of the site. From these assessments we have reduced the number of turbines and are now proposing a Wind Farm development of up to 9 turbines. The most up to date site layout is provided below:



— Property Boundary — Wind Farm Site Boundary

Grid Connection Route

We have also been assessing the route to export the electricity generated from Keerglen Wind Farm. Electricity generated from the proposed development will be exported via a 38kV underground cable from a proposed electrical substation at the Wind Farm site. The final destination of the export cable has not yet been determined but it is expected to connect in the Tawnaghmore area. Further assessment on this aspect of the grid connection will be conducted and concluded in the coming months.

At this stage it is proposed that the grid connection infrastructure will be installed underground within the body of the public road network along the route.



Turbary Rights

ABO Wind are encouraging anyone claiming a right to cut turf within a 50m radius of the proposed 9 turbine locations to get in touch with us. We have erected a sign at each of the proposed 9 turbine locations on the site which includes contact information on how to get in touch with us. You can also use the contact information provided at the bottom of this newsletter.

Contact Details

Please be assured that we are actively monitoring the feedback received through both the website forum and e-mail address and will respond to any queries in a timely manner. We will continue to make every effort possible to ensure that we address any concerns that you may have and provide you with the information you need in order to fully understand the details of this proposed project.

Community Liaison Officer – David Clarke
Phone – +353 (0)1 289 08 45
Email – keerglenwindfarm@abo-wind.com
Website – www.keerglen-windfarm.com

Next Steps

Come join us at our public consultation event:

When: Wednesday 21st of June 2023

Time: 4pm – 8pm

**Where: Ballycastle Community Hall
Main Street, Ballycastle, Mayo,
Ireland F26 W180**

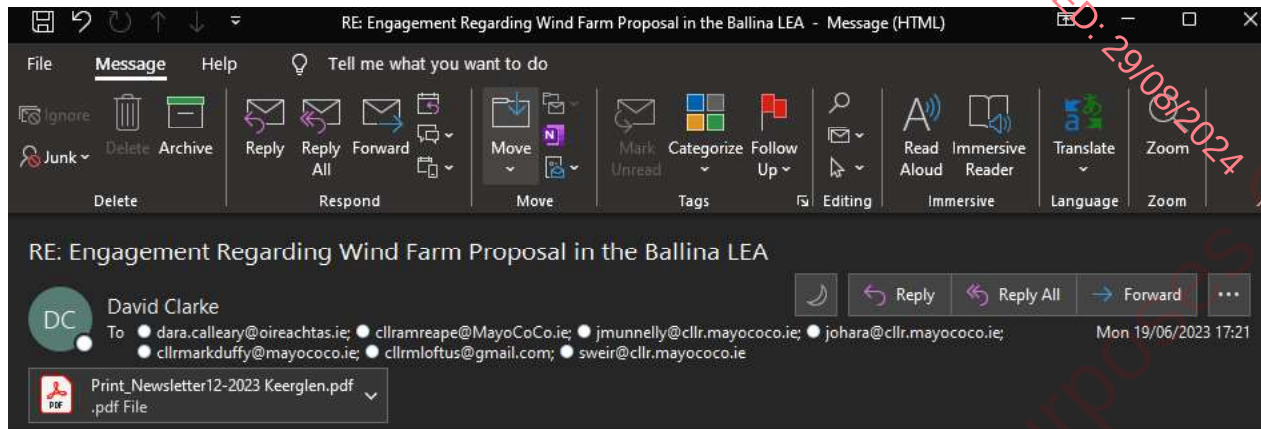
We would like to invite you to our public consultation event where we will display our proposals for Keerglen Wind Farm. Members of the project team will be on hand to answer any questions you may have. We look forward to meeting you at the event.

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Annex D

Councillor E-mail Regarding
Public Consultation Event
(June 2023)

Keerglen Wind Farm



Dear Councillors,

I hope you're all keeping well.

I am emailing to provide an update on our project and invite you to our public consultation event taking place in Ballycastle Community Hall this Wednesday the 21st of June from 4-8pm. The team and I will be on hand to answer any queries you may have about the proposed project.

Since my last email at the end of November 2021, we have been undertaking environmental studies across the site including ecology/ ornithology, geology and hydrology, landscape and visual, shadow flicker, noise, archaeology, traffic and transport, air quality, population and human health, and telecommunications in order to ensure that the proposed development will not have an adverse effect on the local environment or on people living in the area. Studies are now nearing an end and we hope to be in a position to submit the planning application for the project to Mayo County Council in Q3 2023.

I have attached the project newsletter which contains further details of the project. Again, we hope you can make it to the public consultation event in Ballycastle Community Hall this Wednesday the 21st between the hours of 4-8pm.

Please don't hesitate to get in touch if you've any further questions.

Kind regards,

David
David Clarke
Planning Project Manager

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



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Annex E

Advertisement in the Western People regarding the Public Consultation Event

Public Notices

KEERGLEN WIND FARM - INVITATION TO PUBLIC CONSULTATION EVENT

ABO Wind Ireland Ltd, would like to invite you to a public consultation event where we will display our proposals for a future wind farm development within the townland of Keerglen, Co. Mayo.

ABO WIND

Where: Ballycastle Community Hall
Main Street, Ballycastle, Mayo,
Ireland F26 W180

When: Wednesday 21st June 2023

Time: 4pm - 8pm

The public consultation event will run on Wednesday the 21st of June between the hours of 4pm - 8pm. It will give you the opportunity to view information pertaining to the proposed development and leave your feedback. Members of the project team will be on hand to answer any questions you may have.

We look forward to welcoming you to the public consultation event.

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Dial-A-Brush, Experienced painter, exteriors and interiors, Ballina region.
Contact Kevin Devers on 087 9356189



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Western People

Motorist acquitted of careless driving after Swinford crash

A Swinford woman has been acquitted of careless driving.

Siobhán King, 4 Coill Abhainn, Swinford, pleaded not guilty to the offence.

Jacqueline Brady told Ballina District Court that she was driving on the Dublin Road in Swinford on March 1, 2022, and was indicating to make a left turn when her vehicle was impacted from behind. Cross-examined by solicitor Brendan Donnelly, Ms Brady said she did not hear any brakes and did not see Ms King driving behind her.

Gda Dermot Kenny told the court he attended

the scene and spoke to both drivers, Ms Brady and Ms King. All of their documents were in order and both tested negative for alcohol.

Under questioning from Mr Donnelly, Gda Kenny said he had received no calls regarding erratic driving while on duty at Swinford Garda Station prior to this incident. There were no witnesses to the accident and Gda Kenny did not see any brake marks.

In making a submission to Judge Patricia Cronin calling for a dismissal, Mr Donnelly said his client had made full admissions and accepted

responsibility for what had occurred, but the State had failed to prove that she drove in a careless manner.

Insp Naomi de Ris said Ms King had failed to drive with due care or attention by failing to notice Ms Brady's indicator.

Mr Donnelly said no evidence had been heard to say Ms King was driving without due care or attention.

In dismissing the case, Judge Cronin said nothing drew Ms Brady's attention to the manner of Ms King's driving and local gardai had not received any reports of erratic driving.

'No reason to come back to Castlebar'

A man who shouted aggressively at gardai in Castlebar while intoxicated has been fined.

Zimbabwean national Albert Madume, aged 23, with an address at Ocean Waves, Salthill, Co Galway, pleaded guilty at Castlebar District Court to public intoxication and using threatening or abusive language.

The court was told that Gda Martin Friel was dealing with a group of youths who were engaging in anti-social behaviour at Knockroghery, Castlebar, at 9.14pm on May 23 last. The defendant was present and started shouting at the gardai in an aggressive manner. Gda Friel believed Madume was drunk.

The defendant has no previous convictions. Solicitor Gary Mulchrone said his client apologised to the gardai and assured them he would not trouble them again. He has been living in Ireland for the past decade.

"He has no reason to come back to Castlebar ever again," said Mr Mulchrone.

Judge Fiona Lydon imposed a fine of €200.

KEERGLEN WIND FARM - INVITATION TO PUBLIC CONSULTATION EVENT

ABO Wind Ireland Ltd, would like to invite you to a public consultation event where we will display our proposals for a future wind farm development within the townland of Keerglen, Co. Mayo.

ABO WIND

Where: Ballycastle Community Hall
Main Street, Ballycastle, Mayo,
Ireland F26 W180

When: Wednesday 21st June 2023

Time: 4pm - 8pm

The public consultation event will run on Wednesday the 21st of June between the hours of 4pm - 8pm. It will give you the opportunity to view information pertaining to the proposed development and leave your feedback. Members of the project team will be on hand to answer any questions you may have.

We look forward to welcoming you to the public consultation event.

Firefighters let down, says Sinn Féin TD

Sinn Féin TD Rose Conway-Walsh has criticised government TDs in Mayo who failed to back a Sinn Féin motion on pay and conditions for retained firefighters.

Deputy Conway-Walsh said: "Retained firefighters have been pushed to the very brink by this Government. They feel they have been left with no choice but to engage in strike action."

"They bravely save

lives while putting their own on the line, as they work to protect communities across Mayo. Yet, poor conditions and unsafe staffing levels have contributed to a recruitment and retention crisis."

"The Government has neglected their calls for reform and has failed to act. Sinn Féin brought a motion to the Dáil this week to ensure that the retained firefighters in

Mayo get fair pay and conditions, as well as ensuring safe staffing levels."

"Shockingly, the other Mayo TDs didn't back Sinn Féin's motion. They failed to stand with retained fire services and the communities they protect."

"These TDs must explain why they have done this. The firefighters and wider community deserve answers."

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Annex F

Public Consultation Event

Photos

Mayo Planning Authority - Inspection Purposes Only

