

## Submission to An Coimisiún Pleanála

Re: Proposed Laurclavagh Renewable Energy Development (Case Ref: PA07.319307)

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### 1. Introduction & Overall Concerns

We, the undersigned residents, wish to formally object to the proposed Laurclavagh Wind Farm.

We are **not opposed to renewable energy** and we support climate action. Our concern is that this particular development is in the **wrong place and at the wrong scale** for our community and landscape. We are especially worried about:

- Noise, sleep disturbance and general health impacts.
- Loss of residential amenity (visual impact, shadow flicker, constant movement).
- Risks to groundwater, private wells and group water schemes.
- Impacts on wildlife (birds, bats, habitats).
- Serious harm to the **heritage, landscape and tourism value of Knockma Hill (Cnoc Meadha)** and its wider setting.

Overall, we are concerned that **this project appears to be fraught with factual shortcomings, environmental risks and planning conflicts** that are very similar to (and in some areas worse than) those that have led to refusals of other wind farms in Ireland.

With respect, we **ask An Coimisiún Pleanála to refuse permission** in order to protect our homes, our water, our heritage and our local tourism.

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### 2. Description of the Proposal & Local Context

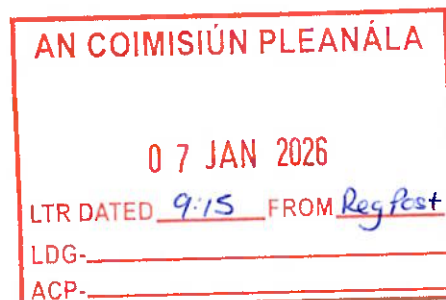
The proposal is for **8 industrial-scale wind turbines**, each approximately **185 m to blade tip**, with associated roads, foundations, substation and a 110 kV grid connection. The site is in a **settled rural area** with:

- Numerous houses.
- Farms and small businesses.
- Private wells and group water schemes.
- A strong sense of local community.

It lies within a wider landscape that includes:

- **Knockma Hill (Cnoc Meadha)** – a major cultural, archaeological and recreational site.
- Turloughs, lakes and karst groundwater systems.
- Scenic views towards Lough Corrib, Connemara and Croagh Patrick.

In short, this is **not a remote, empty upland**, it is a lived-in, historically rich and environmentally sensitive area.



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### 3. Noise, Health & Residential Amenity

We are anxious about the long-term noise and health consequences of siting very large turbines close to homes. Our key concerns include:

- **Outdated standards**
  - The noise assessment appears to rely primarily on older guidance (e.g. 2006 wind energy guidelines / ETSU-type limits).
  - It does not clearly demonstrate compliance with more recent **WHO 2018 Environmental Noise Guidelines**, which recommend lower levels for health protection, or with the HSE's current thinking on wind farm noise.
- **Quiet rural baseline**
  - The area is extremely quiet at night, background levels are low.
  - Even "modest" turbine noise (especially the "swish / thump" from blade passage) will be **very noticeable** and has real potential to disturb sleep.

- **Health impacts not fully addressed**

The documentation does not meaningfully assess:

- Chronic sleep disturbance.
- Impacts on mental health, stress and quality of life.
- The position of vulnerable groups (children, older people, those already unwell or those with neurodivergences such as autism).
- No clear health impact assessment (HIA) has been carried out, despite growing evidence linking environmental noise and health outcomes. Lack of assessment from the HSE is concerning.

We are worried that once these turbines are erected, we will have **no practical way to escape the noise**, day or night, especially in still weather when we normally expect peace and quiet.

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### 4. Shadow Flicker & Visual Intrusion at Homes

We are also very concerned about **shadow flicker and general visual intrusion** at our homes.

#### Shadow flicker

- Current guidelines allow up to **30 hours per year** and 30 minutes per day at any dwelling.
- Draft revised guidelines move towards **no shadow flicker at existing houses**, achieved through automatic turbine shutdown.
- The application appears to rely on modelling and control software to stay under the 30-hour threshold, but the applications shows that several houses in the vicinity will exceed the limit and require mitigation. Residents may experience many hours of strobing per year.
- Any system failure or miscalculation will be experienced first by residents, who then carry the burden of proof.

### Overbearing visual presence

- At 185 m height, each turbine is roughly the height of a **60-story building**.
- From many homes the turbines will be prominent, moving, and highly visible, altering what are now rural, low-rise views.

We fear this will **seriously diminish the enjoyment of our homes**, gardens and outdoor spaces, and make normal day-to-day living more stressful.

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## 5. Knockma Hill – Heritage, Landscape & Tourism

Knockma is central to why we believe this location is particularly unsuitable.

### Heritage significance:

- **Knockma Hill (Cnoc Meadha)** is a distinctive hill and landmark, with:
  - Large **prehistoric cairns** on the summit, associated in folklore with **Queen Maeve** and with **Finvarra**, king of the Connacht fairies.
  - Surrounding ringforts, barrows and earthworks from multiple eras (Neolithic, Bronze Age, Iron Age and early Christian).
  - Links to early Christian heritage (e.g. Donaghpatrick and Lough Hackett) and to the later **Castlehackett** estate.
- It forms one of the **most important ancient landscapes in north Galway**, with mythology, archaeology and local tradition all interwoven.

### Landscape and tourism value:

- Knockma is a very popular **walking and family amenity**, with marked forest trails, parking and interpretation.
- It is widely promoted in tourism material as:
  - A “fairy hill” with strong legend and folklore.
  - A place with **superb panoramic views** over Lough Corrib, Connemara and Croagh Patrick.
- Knockma has become a **key day-trip destination**, used by:
  - Local families and schools.
  - Visitors from Tuam and Galway City.
  - Domestic and overseas tourists.

### Visual impact from turbines:

- The proposed turbines (185 m) will be **taller than the hill itself** (c. 160–170 m).
- From the summit and key viewpoints on Knockma:
  - Turbines are likely to break the skyline and feature in views towards the south and south-west.
  - This will alter the **“wild” and historic feel** of the panorama and visually link the hill with an industrial wind farm.
- From lower ground, the combined effect may be that Knockma is no longer perceived as the dominant, ancient focal point in the landscape, but as one element in an industrialised horizon.

Tourism is highly sensitive to **perceptions of unspoilt scenery**. Knockma’s appeal depends heavily on the feeling of stepping into an old, largely untouched Irish landscape. We are very worried that this will be lost if huge turbines become part of every view and photograph from the hill.

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## 6. Water, Groundwater & Flood Risk

Many of us rely on **private wells and group water schemes**. The site sits in a **karst limestone environment**, which brings particular risks.

Our concerns include:

- **Groundwater vulnerability**
  - Karst aquifers transmit water (and pollutants) rapidly through underground channels, often with little natural filtration.
  - Large excavations for turbine foundations, crane hard-stands and access roads can intercept and alter these flows.
  - Concrete, grout, fuel or oil spills on site can migrate quickly and unpredictably.
- **Drinking water security**
  - Several group water schemes and many private wells draw from this system.
  - Contamination could leave communities with undrinkable water and substantial costs for remediation or alternative supplies.
- **Flooding**
  - Parts of the area are already known to flood during heavy rain.
  - More hard surfaces and changes in drainage patterns risk **increasing surface runoff**, potentially worsening flood risk for homes and local roads.

We do not feel that the EIAR gives enough comfort that **our water and flood risk will be protected** over the lifetime of the wind farm and beyond decommissioning. Our drinking water *is not* something we can gamble with. We do not feel the risk has been reduced to a level that gives us confidence.

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## 7. Ecology – Birds, Bats & Habitats

From the available information, we are concerned that ecological impacts have not been fully excluded.

- **Birds**
  - Surveys have recorded or suspected **sensitive species** (e.g. Hen Harrier-type sightings), with notes acknowledging uncertainty in identification.
  - The wider area (fields, wetlands, turloughs) is used by various wintering and breeding birds.
  - Under European nature law, where there is **reasonable doubt** about impacts on protected species or nearby designated sites, permission should not be granted.
- **Bats**
  - Woodland edges, hedgerows and waterbodies around the site are typical **bat foraging and commuting habitat**.
  - Bats are highly vulnerable to **collision and barotrauma** from turbines.
  - It is not clear that the surveys and proposed mitigation are sufficient or robustly defined.
- **Habitats**
  - The presence of turloughs, wetlands and semi-natural grasslands in the wider area adds sensitivity. Habitat fragmentation, hydrological changes and construction disturbance can have subtle but significant effects.

We are worried that, once again, the development is being placed in a **complex and sensitive ecological setting** where uncertainty remains, rather than in a location with clearly lower biodiversity risk.

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## 8. Planning Policy, Precedent & Tourism Economy

Finally, we are concerned that the proposal does not sit comfortably with key planning policies and practical experience.

- **Galway County Development Plan 2022–2028**
  - Seeks to protect scenic views, heritage landscapes and rural amenity.
  - Steers major wind energy developments towards appropriate areas.
  - While we understand the need for renewable energy, this location appears to conflict with those aims, particularly given Knockma's importance.
- **National guidance and trend**
  - Draft revised wind energy guidelines (though not yet adopted) move towards:
    - Lower noise limits.

- Elimination of shadow flicker at homes.
  - Greater protection for sensitive landscapes and heritage.
- Approving Laurclavagh now, under older standards, risks creating a long-lived development that is **out of step with emerging best practice**.
- **Fáilte Ireland & tourism**
  - National tourism research shows that **landscape and scenery are central to Ireland's tourism offering**, and that while visitors accept wind farms in some contexts, they are **less accepting in areas of high scenic or heritage value**.
  - Knockma and its surroundings form exactly the kind of product – folklore, walking trails, wide scenic views – that rely on an intact natural landscape.

We fear that the **long-term tourism and amenity value** of this area is being undervalued compared to the short-term gain from one wind farm.

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## 9. Conclusion – Our Respectful Request

Taking all of the above together, we are **genuinely worried** that the Laurclavagh Wind Farm is:

- Too big and too close to homes.
- Too risky for our groundwater and wells.
- Too uncertain in its impact on birds, bats and habitats.
- Too damaging to the heritage, landscape and tourism value of **Knockma Hill** and the wider area.
- We are concerned that the proposal appears to be **fraught with factual shortcomings, environmental risks and planning policy conflicts** similar to those that have led to refusals elsewhere, and in some respects more severe.
- We fear that if this development goes ahead, the **damage will be irreversible** for our community and for a landscape we regard as part of Ireland's heritage.

We therefore **respectfully and firmly ask An Coimisiún Pleanála to refuse permission** for the Laurclavagh Renewable Energy Development.

We make this request in good faith, out of a strong desire to protect our homes, our health, our water, our wildlife and the unique landscape of Knockma for present residents and for future generations.

**Signed,**

Patricia Duggan

[Print Name]

Patricia Duggan

[Signature]

9 / 12 / 25.

[Date]