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To An Coimisiún Pleanála
Re proposed Laurclavagh Limited.
Renewable energy development.
Case Ref ABP-319307-24

AN COIMISIÚN PLEANÁLA	
07 JAN 2026	
LTR DATED	<u>9:15</u> FROM <u>Reg Post</u>
LDG-	_____
ACP-	_____

Environmental Noise

We as local residents are very concerned about the effects of the environmental noise nuisance during the construction phase and operational phase of this proposed Industrial Wind-farm in our quiet open country area. In their EIAR MKO and the applicant have much discussion about noise-limits to be applied to this project which based on the 2006 Wind Energy Guidelines which are almost a quarter of a century old, which has been repeatedly been described by legislators are outdated no longer fit for purpose, in assessing wind turbine noise impacts particularly in rural environments. The 2019 guidelines remain in draft, the applicant admits that the proposed wind farm cannot comply with the draft 2019 guidelines. This is a huge concern for all of us living in the community and on the access road L61461 as there has been no assessment of the impact of 2-3 years construction noise, multiple compressors, multiple rock breaking equipment, explosions vibrations and the impact of the constant dust will have on our health. In fact the applicant suggests that the construction of the new access road will not cause any vibrations despite the fact that during the construction phase we will be subjected to both noise nuisance and dust pollution day and night. The noise nuisance from one rock breaker can be heard from a distance of two and a half KM can you the board members imagine the noise nuisance from multiple rock breakers on this sensitive site?

MKO did not do an assessment of the impact of the noise and vibrations from the wind farm at the operational phase on any of the residents houses on the L61461, this is totally unacceptable because the proposed wind farm is at the back of our houses in an area of limestone rock with karst limestone pavements, and we ARE inside the 1KM in fact we are 740m from turbine 8 and the access road is at the back of our houses. Installing eight 185 meter high wind turbines on karst rock and near limestone pavements can lead to potential seismic effect such as structural risk due to the unstable nature of Karst. Ground vibrations can be amplified by the Karst system, there is an increased risk of subsidence if water flow is altered. Karst is prone to sinkholes and conduits and the added weight and vibrations from construction and installation of wind turbines, a substation and ground works could exacerbate existing weakness and cause damage or collapse causing pollution to the ground water, river Clare And Lough Corrib SAC, SPA, Refer to Hydrology report by Dr Pamela Bartley.

In Ireland article 40.3.2 of the Irish Constitution states that the State guarantees to respect and defend the rights of the citizens, including the right to private property. The right to the quiet enjoyment of one's property is protected by the Planning and Development Acts, Regulations on noise pollution and environmental protection.

9.2.1 Legislative references considered specifically for the assessment of noise from quarrying include

- Directive 2002/49/EU of the European Parliament and of the Council (amending Directive 2002/92/EU)
- European Union (Planning and Development) Environmental Impact Assessment Regulations 2018, S.I. 296 of 2018
- Planning and Development Regulations 2001 (as amended)

In addition to the above Directive 2002/49/EU provides a basis for developing and completing measures concerning noise emitted by major sources in particular roads and infrastructure, industrial equipment and mobile machinery.

Explosive Noise , Rock breaking Noise and Vibrations

In their construction and Environmental management Plan 3.6 the applicant refers to mufflers or sound reduction equipment to reduce noise and the erection of screens between compressors and generators at noise sensitive areas but they only accessed areas where the land owners were involved. They did not assess the effects on our houses , septic tanks or slatted sheds, on the new access road or the other local roads surrounding this proposed site.

In this section the applicant refers to blasting , they discuss in detail their plan for blasting

- Restriction of hours which blasting can be conducted
- Notification to nearby residents
- Firing of blasts at similar times to reduce “startle “ effect.
- Informing people of the progress of the work.
- Implementation of an onsite documented complaints procedure .
- Trial blasts to assist in blast designs

Yet in their response Item 13 Other Matters (EiAR & NIS) MKO and the applicant states that based on the assessments and site investigations carried out to date , it is not envisaged that rock blasting will be required, so what does that mean? Envisaged being the operative word ,how do the applicants propose to dig out eight deep foundations to install 185m above the ground Wind turbines , a substation and lay underground cables to the grid ? Again this part of the construction phase will impact the whole community surrounding this proposed development .We have the right to enjoy our property , our children have the right to their education in a safe noise nuisance free schools. (Article 40.3.2.) Article 41 Irish Constitution recognizes the family as the “natural primary and fundamental unit group of Society” and obliges the state to protect it” This sensitive site is unsuitable for this type of development as stated by inspector Sarah Lynch this site is within an area where Wind Development is **GENERALLY TO BE DISCOURAGED** (Inspectors report 7.13)

Conclusion

Wind Turbines,a substation and ground works of this size and scale proposed by the applicant are unsuitable for this sensitive site in the town land of Laurclavagh. Its in breach of the Habitats Directive (92/43/EEC), Birds Directive (2009/147/EEC) and the Water Framework Directive (2000/60/EC) So for all the reason outlined above we urge you

the Commisium Bord Pleanala to refuse planning permission for the proposed Laurclavagh Wind Farm Case Number 319307 .

Roads

MKO and the applicant have failed do demonstrate that the local roads surrounding the site are of adequate capacity and design to accommodate the volume and frequency of HGV traffic proposed along the routes. 1.3 Roads and traffic ,At the junction of L-61461 to the N83, no consent has been given from the land owner or from the private houses owners to set back their property in order to achieve sight distance where current sight distance y - splay traverses through adjoining third party boundary.

The L61461 local cul-de-sac (**Boreen**) is totally inadequate to accommodate the volume of heavy plant deliveries, large cranes for turbine erection ,fuel delivery trucks ,site clearance equipment, tree felling equipment steel reinforcement deliveries, site compound construction deliveries . Road construction building deliveries, Concrete deliveries during foundation construction , repeated deliveries of large cables and equipment for the substation.

The delivery of abnormally sized loads by abnormally sized vehicles for turbine and substation components. As residents on the L61461 we have the right of access to our homes ,without the added worry that we are going to be involved in a head on collision or rear ended shunt as we turn right or left on to the N83 or as we enter the L61461 from the N83, this right is protected by planning laws . We feel that our rights and the rights of our families has been violated because MKO and the applicant have not considered our right of access to go to work and carry out our daily activities during the construction phase.

Construction Traffic Intensification on the N83 and at the junction L61461 and L61464 contravenes the Galway county development plan and good planning practices.

- The L61461 contains the homes of the 10 family residents , 7 of those residents have Businesses , they are self employed people.
- 4 are farms and land owners who regularly use the road to access land and attend their animals.
- The other residents use the road daily to work in Tuam , Galway and locally .
- We will loose the recreational value of our **Boreen** (L61461) locals use the road to run, walk , walk dogs, teaching children to cycle,

horses , the thought of our road being used for construction traffic for 2 to 3 years is most distressing.

Altogether there about 37 licensed vehicles using the L61461 on a daily basis to access the N83 .Emergency access would definitely be compromised during the construction phase.

MKO and the applicant propose to access the Lauraclavagh site via a new temporary road to the west of the N83, south of the junction to the existing L61461 local road.The Galway Development plan 2022-2028 states that Commercial and Industrial developments shall be prohibited outside the 50/60 km speed limits on National roads.

The road opposite L61464 is the route to the local school, creche , businesses and residents . Burkes Buses run a daily ,on the hour bus service from Tuam to Galway it stops just above the L61461 to pick up commuters travelling to Galway for work , students attending collage, shopping trips and for other business.On the return journey to Tuam the Bus stops just below the L61461 junction . That is about 30 trips to and from Galway per day .The Intensification of the traffic in this area of the very busy N83 will create serious risks for daily commuters ,school children boarding school buses, walkers and cyclists .This proposed development would endanger public safety and be contrary to proper planning laws. Refer to Martin Lavelle submission.

Conclusion

We as residents on the L-61461 have not had proper meaning consultation with the developer , THEY HAVE COMPLETELY LEFT US OUT.They have not engaged with the local community and this lack of inclusion is totally unacceptable. They have ignored The Galway County development plans for the area and good planning practices- and laws.

This is an unjust attack on our area ,this proposed development will have a detrimental impact on our now quiet area at all phases during construction and operational . (Article 40.3.2) which states “The State shall in particular, by its law protects as best it may from unjust attack and, in the case of injustice done, vindicate the life , person, good name and the property rights of every citizen”.

This proposed development will with doubt have a major negative impact on our daily lives .Eight 185m wind turbines and a substation will dominate the local landscape and skyline and because of its very close proximity to family homes, farms, equine businesses and schools it will

have a detrimental impact on the value of the area and the value of local houses and properties .It will also cause a significant environmental damage to our ground water, River Clare SAC and Lough Corrib SAC ,SPA. For these reasons we ask AN Coimisiun Pleanala to refuse Planning Permission for The Laurclavagh Renewable Energy development (Case No PA07.319307)

Signed

Rosanne Mahon
Martin Mahon

5/1/2026
05/01/2026