

An Coimisiún Pleanála  
64 Marlborough Street  
Dublin 1



DESIGNING AND DELIVERING  
A SUSTAINABLE FUTURE

Our Ref: P25357-FT-EN-XX-RP-PL-0002

09th February 2026

**Re: Response to Galway County Council Planning Authority Report**

Dear Ms White,

On the 13th January 2026, An Coimisiún Pleanála (ACP) issued Galway County Councils Planning Authority's report which sets out observations pertaining to the Shancloon Wind Farm development proposed by RWE Renewable Ireland Limited (the Applicant). Galway County Council's Report, dated 10th December 2025, included the views and recommendations of the Elected Members of the Tuam and Ballinasloe Municipal Districts, dated 15th December 2025, as required by Section 37E(5-7) of the Planning and Development Act 2000 (as amended).

Fehily Timoney and Company (FT), Core House, Pouladuff Road, Cork, has been engaged by RWE Renewable Ireland Limited, to make a response to the Planning Authority's Report.

We note that the date of the application for the proposed Shancloon Wind Farm was 19th September 2025, and in accordance with Section 37E (4) of the Planning and Development Act 2000 (as amended), the Planning Authority is obliged to submit their report to ACP within 10 weeks from the making of the application. The submission by Galway County Council to ACP was not in accordance with the timeline set out in the Act.

We set out below our response to the Planning Authority's Report.

### Policy

The Applicant has reviewed the Planning Authority's views on the effects of the proposed development on the environment and the proper planning and sustainable development of the area. The Applicant acknowledges the Planning Authority's conclusion that "it is considered that the proposed development is acceptable in principle subject to the assessment of all other material planning considerations..."

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## **LVIA**

The Applicant acknowledges Galway County Council's position on the findings within the Coolglass Windfarm Limited v. An Coimisiún Pleanála IEHC 1 (2025) judgement, which highlights that the overriding interests of renewable energy targets should take precedent over local landscape and visual impact considerations.

## **Relevant Planning History**

We provide a point of clarity in relation to the County Council's observation under Item 5 'Relevant Planning History' that "... the Cooloo WF SID application has been omitted from the 20km WF study area for this proposed project". This is correct. The Cooloo Wind Farm is located 21.3 km from the proposed Shancloon Wind Farm, i.e. outside of the 20km study area, as reflected also in the LVIA study area map included in the Cooloo application (ACP case 323761).

## **Heritage and Archaeology**

In relation to Heritage and Archaeology, the Council's recommendation for conditions pertaining to the protection and monitoring of Archaeology and Cultural heritage are noted and The Applicant commits that, in the event of grant of permission, and in accordance with Section 15.6 of Chapter 15 of the EIAR, pre-construction geophysical survey will be carried out by a suitably qualified archaeological consultancy, followed by a programme of targeted archaeological test trenching. Additionally, all ground works will be supervised and monitored during the construction phase by an archaeological consultant.

## **Roads Department**

The concerns of the Roads Department set out in section 10.5.2 of the report are noted and we respond as follows:

### Item 1 – Ability of the surrounding local road network to serve the subject site

Full consideration has been given in the EIAR and in the design of the wind farm to the integrity and appropriateness of the local road network to accommodate the proposed development. This included (as set out in Chapter 14 of the EIAR) meeting with the Galway County Council Roads Department Area Engineer on site to discuss the proposed haul routes, the turbine delivery route, road upgrades, and construction entrances. All recommendations received were implemented into the design. The effects on the local road network have been assessed in the EIAR as short-term in duration and slight to moderate in magnitude.

As a point of clarity to the Roads Department comment that “no provision of passing bays” has been provided, section 5.3.2.1 of Appendix 14.2 (Traffic Management Plan) of the EIAR provides a detailed analysis of the local road capacity and includes proposals for road widening and for the construction of passing bays (for two large tipper trucks) at 7 no. locations along the L-6483 and L-2234. The grid route and substation access has equally been assessed for passing opportunities and road capacity as per Section 5.4 of the Traffic Management Plan. As such, the necessary infrastructure to allow for contraflow manoeuvres in accordance with TII Publications DN-GEO-03031 Rural Road Link Design is designed for in the project.

The Roads Department notes absence of auto tracking analysis and wheel tracking analysis for the proposed development. This is incorrect. A detailed Swept Path Analysis and wheel tracking for abnormal loads has been carried out as provided in Appendix 14.1 of the EIAR which shows all accommodation works necessary to accommodate delivery to site. The accommodation works, which includes road widening and load bearing surfaces, have been fully assessed in the EIAR.

#### Item II - Technical & Structural Pavement Analysis

As per Section 6 of the Traffic Management Plan, Appendix 14.2 of the EIAR, to ensure no permanent degradation of the local road network, the applicant commits to the following:

- Pavement Condition Rating (PCR) & Video Survey: A comprehensive high-definition video survey and PCR assessment will be conducted for the entirety of the delivery route (L-6483, L-2234, L-6100) prior to commencement. This establishes a legal “fingerprint” of the road’s condition.
- Falling Weight Deflectometer (FWD) Testing: At locations identified as potentially “soft” (e.g., the New Line), FWD testing will be used to measure the structural strength (stiffness) of the road layers.
- Post-Construction Audit: Upon completion of the 24-month construction phase, the surveys will be repeated. Any deviation from the baseline condition will be rectified by the applicant to a standard that meets or exceeds the original condition, as verified by Galway County Council (GCC).

It is standard practice for a development such as Shancloon Wind Farm’s application grant of permission to be subject to the lodgement of a Financial Security Bond with Galway County Council roads department. This bond is only released once the Roads Authority is satisfied that the structural integrity of the local network has been maintained or improved.

We note also that Appendix 2.5 of the EIAR includes a Bridge Inspection Report, which does not appear to be referenced by the Roads Authority in their report.

#### Item III - Road Safety Audit

We note that the following guidance has been adhered to in the design of the wind farm and in preparation of the Traffic Management Plan:

- Traffic and Transport Assessment Guidelines – May 2014, Transport Infrastructure Ireland (TII);
- DN-GEO-03060: Geometric Design of Junctions, May 2023, TII;
- DN-GEO-03031: Rural Road Link Design, May 2023, TII;

#### Item IV - Traffic and Transport Assessment

As per Section 14.3.2 of the EIAR, TII Publication PE-PDV-02045: Traffic and Transport Assessment Guidelines, TII, 2014 was adhered to during the assessment of traffic and transport. Chapter 14 of the EIAR provides a detailed overview of the existing baseline traffic and transport environment and provides detailed Vehicle Trip Distribution assessments. The Traffic Management Plan addresses Public Road Crossing Points / junctions and presents measures for the management of traffic streams and service access.

#### Item V - Sightlines

Please refer to Section 14.5.4 of Chapter 14 of the EIAR and planning drawing P20-306-0101-0001 which demonstrate that the sightlines achievable at the site entrances accord with acceptable standards.

#### Item VI - Additional Road Traffic: Traffic Hazard and Obstruction of Road Users

The EIAR includes a detailed Traffic Management Plan which ensures fully controlled traffic movements to ensure public safety. Measures include measures inter alia the following:

- Peak Traffic Management: While the construction phase is 24 months, the high-intensity "concrete pour" days for turbine foundations are limited to 11 non-consecutive days. On these days, all other non-essential deliveries will be curtailed to avoid saturating the local road network.
- Courtesy Protocol: A "Road Safety and Courtesy Procedure" will be mandatory for all contractors. This includes a "Give Way" policy for local residents, school buses, and cyclists. A full-time Traffic Management Coordinator will oversee this protocol.
- Restricted Hours: Deliveries will be scheduled to avoid peak commute times (e.g., school & bus runs, work rush hours) where possible.

#### **Climate and Environment**

The views of the Climate Unit are noted. We refer ACP to The Applicant's response to submissions from Prescribed Bodies and Third Parties as issued on 05th February 2026 which addressed the matters raised by The Climate Unit in relation to 'Impact on Surrounding Environment' and 'Carbon Emissions'.

In relation to matters raised under the topic of 'Circular Economy' we refer to Appendix 2.1 of the EIAR (the Construction Environmental Management Plan) requires that material selection at procurement stage will "aim to design and provide structures and elements that will be fully recyclable on decommissioning".

#### **Ecology and Biodiversity**

We note no particular matters were raised by Galway County Council under this topic heading.



**Human Health and Residential Amenity**

We note the Planning Authority's opinion that the proposal would not result in adverse impacts on Population, Human Health and Residential Amenity.

**Recommended Conditions**

The Recommended Conditions set out in Section 11 of the Planning Authority's report are noted.

The Applicant commits to carrying out the development strictly in accordance with the mitigation measures and monitoring proposals and in accordance with timelines as set out in the Environmental Impact Assessment Report (EIAR), Construction Environmental Management Plan (CEMP) and Natura Impact Statement.

If you should require any further information, please do not hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in black ink that reads "Rita Mansfield".

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Rita Mansfield

for and on behalf of **Fehily Timoney and Company** and **RWE Renewable Ireland Limited**