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An Coimisiún Pleanála
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16 November 2025

A dhuine uasail/a bhean uasail / Dear Sir/Madam,

Re: Objection to Planning Application Case Ref PAX07.323699

We are writing to formally express our objection to the proposed construction of a wind farm at Shanclon in Co. Galway. We are full-time residents in an area affected by the proposed development and we have serious concerns about the project.

While we understand the push toward renewable energy sources and the need for sustainable practices, we believe that this specific project poses significant concerns on a number of different fronts if the proposed development were to be allowed in this location.

The proposed wind farm raises concerns related to the concepts of “green grabbing” and the creation of environmental sacrifice zones. Green grabbing refers to the appropriation of land and natural resources for ostensibly environmentally beneficial projects, such as renewable energy, often at the expense of local communities, ecosystems, and existing land uses. In this case, the siting of large-scale turbines in a predominantly rural area could transform the local landscape into a *de facto* sacrifice zone, where environmental, social, and economic interests of residents are subordinated to the broader goals of national energy policy. Such developments disproportionately concentrate impacts - visual intrusion, noise, light pollution, biodiversity loss, and property devaluation - on local populations, undermining community well-being, local amenity, and environmental justice.

Planning authorities must ensure that renewable energy projects do not unfairly transfer burdens to vulnerable rural communities and must carefully evaluate alternative locations or mitigation measures to avoid creating local sacrifice zones.

Environmental and Ecological Impact

Destruction of peatland habitat and carbon cost

The potential environmental impacts of erecting a wind farm of this scale in this area are troubling. We believe that the submitted peat storage and drainage proposals are inadequate to demonstrate no long term adverse effects on the conservation status of neighbouring peat habitats or on groundwater regimes. We request that the Board require a detailed peatland hydrology and stability assessment, a quantified carbon-payback (GHG) assessment, and independent peat/hydrogeology verification of a significantly larger area than the site footprint to determine the full impact of the disturbance likely to be caused by this project.

Without this, the proposal risks irreversible damage to peat habitats and we request planning be refused or deferred pending full wide area peat impact assessment.

Impact on habitat and wildlife

The region supports a diverse range of wildlife species, including several protected under local, national, and European legislation. The removal of approximately 2.3 kilometres of mature hedgerow and treeline, and over half a hectare of mature coniferous forest together with changes to wetland areas resulting from this project, would inevitably disrupt established habitats and would have detrimental effects on local wildlife populations and overall ecosystem balance.

The Collision Risk Modelling (CRM) and associated ornithological assessment presented in the EIAR and Appendix 10.1 lack sufficient transparency and justification to allow for an independent, precautionary evaluation of potential impacts on key bird species. While survey methodologies and effort summaries are described, the applicant does not provide the underlying raw flightline or flight-height datasets required to validate CRM inputs, nor are flight-height distributions reported in adequate detail. Avoidance rates are applied, but the documentation does not include a structured sensitivity analysis exploring precautionary alternatives or lower avoidance scenarios, and no clear justification is provided for the selected avoidance rates based on site-specific behavioural data.

Although multi-season surveys were undertaken, the reporting does not demonstrate how seasonal movements, migration peaks, or flocking behaviour were quantified or incorporated into risk modelling. In the absence of transparent data inputs, detailed seasonal breakdowns, and precautionary scenario testing, the CRM conclusions cannot be regarded as robust. As a result, the potential collision and cumulative impacts on sensitive species remain inadequately assessed, and the application fails to meet the standard of evidence required for informed decision-making.

We therefore request that the Board require full disclosure of CRM inputs, and a robustness check using conservative avoidance assumptions. Until such information is provided, the conclusion that there will be no adverse effect on the integrity of protected sites cannot be regarded as adequately demonstrated.

In addition, we do not believe that the bat assessment provided demonstrates adequate seasonal survey coverage or an evidence-based collision/avoidance mitigation strategy. Given bat species' sensitivity to ALAN (Artificial Light at Night) and turbine collision, the Board should require comprehensive multi-season bat monitoring data, site-specific collision risk assessment, and enforceable operational mitigation (e.g., curtailment/monitoring) prior to determination.

Bats - crucial insectivores, seed dispersers, and pollinators - are fully protected in Ireland under both national and EU legislation, including the Wildlife Act 1976 (as amended) and the Habitats Directive. All bat species and their roosts are protected, making it illegal to harm, kill, or disturb them without a licence. This legal framework reflects the importance of conserving bat populations and their habitats.

Substantial numbers of bat fatalities have been recorded at wind facilities in Europe (e.g., Ahlen 2003; Dürr and Bach 2004; Brinkmann 2006) and internationally. Although bats also collide with other tall structures, the rate of fatalities at wind turbines far exceeds those historically reported at other anthropogenic features (e.g., Avery and Clement 1972; Crawford and Baker 1981; Mumford and Whitaker 1982).

Multiple questions urgently require further investigation to improve understanding of bird and bat fatalities at wind turbines and to inform mitigation. A better synthesis of existing evidence is needed, alongside improved estimates of both fatality rates and habitat-related impacts, especially for sites in new or understudied locations. Determining species presence, abundance, and exposure to turbine risk is essential for evaluating potential impacts. Bats appear to investigate turbines, possibly due to acoustic or visual cues, movement of the blades, sound attraction, or misidentification of turbines as potential roost structures. Further research is required to understand these behaviours and develop mitigation that reduces collision and barotrauma mortality.

Not all bird species are equally affected by wind farms; some are disproportionately impacted. Raptors such as buzzards and hawks, which frequently soar at turbine-blade heights and rely on wind currents, face greater collision risk. Buzzards are fully protected in Ireland under the EU Birds Directive and the Wildlife Act 1976 (as amended). Killing or injuring a buzzard is a criminal offence. Although now present in every county, buzzards remain scarcer in parts of Connacht, making their protection particularly important. Having twice become extinct in Ireland before successfully re-colonising, the species remains vulnerable.

Globally, the rapid expansion of wind-energy infrastructure has been associated with collision mortality, displacement, and habitat loss for raptors - effects that may reach population-level significance, particularly for rare or slower-reproducing species. The operational height of most wind turbines overlaps with the altitudes at which many bird species fly, and raptors are especially vulnerable due to their long lifespan and slow reproductive rates.

Across Europe, wind farms are increasingly deploying LiDAR (Light Detection and Ranging) systems to model wind flow more accurately, improve turbine siting, identify conditions that attract vulnerable bird species, and - when combined with bird-detection systems - enable adaptive turbine shutdowns to reduce collision deaths. This project does not propose the use of LiDAR.

Studies in Europe examining the effects of wind turbines on waterfowl indicate that turbines may compromise foraging opportunities through disturbance-driven displacement. The presence of turbines can also alter habitat-use patterns more broadly, displacing wildlife from turbine-adjacent areas. In addition, audible turbine noise may have further impacts on wildlife (see section on chronic noise pollution below).

Landscape and visual impact

The proposed development would constitute a large-scale, visually intrusive industrial development in an area characterised by open countryside and dark night skies. Its presence would cause significant harm to landscape character and visual amenity, as well as further compromising habitat and protected wildlife.

Scale / Character / Prominence

The height (up to 180m) and number of turbines (11 turbines) are wholly incompatible with the landscape character of the area and would represent an industrial-scale intrusion into an otherwise rural and tranquil landscape.

Irrespective of ecological considerations, the landscape and visual impact of a development of this scale at the proposed location is inherently significant. The Environmental Impact Assessment Report (Volume 1, p. 60) states that *"no significant visual impact will occur with respect to centres of population,"* relying on photomontage assessments. However, according to the GLVIA3 guidelines, photomontages must be objective and representative to enable accurate assessment of visual effects. The Naturescot *Visual Representation of Wind Farms Guidance* report advises that photomontages may subtly exaggerate turbine prominence to improve clarity, with any enhancement clearly disclosed in the Environmental Statement. However, some of the photomontages submitted appear to **minimise** the true prominence of the proposed turbines. At over three times the height of Liberty Hall, these

enormous structures will be considerably more visible than indicated in the mock-ups. The attached sample photomontage with the wireline model overlaid, demonstrates that the adverse daytime visual effects are materially underestimated, contrary to the requirements of GLVIA3 for a transparent and reliable visual impact assessment.



Example of original planning pack photomontage of VP12 panorama – edited for this submission by overlaying with accompanying wireline model

Long-term Light Pollution, Loss of Dark Sky Amenity, and Impact on Developing Astro-tourism

The proposed wind farm will cause significant and unacceptable night-time visual impacts, including long-term light pollution, loss of dark sky amenity, and negative effects on developing astro-tourism. Mandatory Aviation Obstruction Lighting on turbines of this height will flash synchronously across the site and be visible for miles, creating a highly industrialised intrusion into the rural night-time environment. No photomontages or comprehensive dark sky assessments from nearby residences have been provided. According to GLVIA3 and best practice guidance, such visual assessments must be objective, representative, and account for cumulative and night-time effects - however, this does not appear to have been demonstrated. The proposed lighting will compromise biodiversity, residential amenity, and dark sky resource, in conflict with Policy DS 1 of the Galway County Development Plan 2022-2028 and the principles of the Mayo County Council Dark Sky Policy.

Without verified photomontages and a robust assessment of night-time impacts, the development will have a serious, long-term detrimental effect on both rural visual amenity and ecosystems and should be refused.

Chronic Noise Pollution and Shadow Flicker

The construction and operation of the proposed wind turbines would result in significant noise and shadow-flicker impacts, which would adversely affect the acoustic amenity, quality of life, and well-being of nearby residents. The Environmental Impact Assessment Report (EIAR) and Construction Environmental Management Plan (CEMP) do not provide transparent predictive noise tables for the nearest receptors, nor do they include enforceable shadow-flicker mitigation measures for affected dwellings.

We therefore submit that the Board should require:

1. Full predictive noise modelling, covering both construction and operational phases, in accordance with the 2019 Wind Energy Development Guidelines (2019 WEDG), for all occupied dwellings.
2. A detailed shadow-flicker assessment with mitigation measures, also following the 2019 WEDG.

Without these, approval could permit potentially unacceptable harm to residential amenity.

Noise and disturbance from wind turbines can also impact wildlife, interfering with communication, foraging, mating, and territorial behaviours. Chronic exposure may induce physiological stress in both flying and ground-dwelling species, potentially affecting health, immune function, and reproductive success, contributing to biodiversity loss (EEA, 2019). For example, studies on common voles have shown increased corticosterone levels in individuals living near turbines, highlighting measurable stress responses in wildlife. Consideration of these impacts is essential to ensure compliance with environmental protection obligations and to safeguard biodiversity.

Economic Harm and Loss of Amenity

The industrial scale of the proposed wind farm is likely to reduce property values in the area, directly affecting the financial well-being and quality of life of residents. In addition, the turbines could negatively impact local businesses, particularly tourism and the growing astro-tourism sector, reducing visitor numbers and economic activity. These impacts, combined with the visual, acoustic, and light intrusions described above, constitute a material diminution in the amenity and economic value of the surrounding area.

Taken together, the visual, acoustic, light, and economic impacts of the proposed development are significant, long-term, and inadequately addressed in the application. The lack of full photomontages, robust noise and shadow-flicker assessment, and dark sky evaluation prevents proper appraisal of the

impacts on residents, wildlife, and local economy. For these reasons, we respectfully submit that the application should be refused.

Sustainability Contradiction

The development presents a significant sustainability contradiction that undermines its claimed environmental benefits as follows:

- Carbon and Resource Intensity

The construction of wind energy infrastructure, including deep foundations, large-scale components (blades, nacelle), and extensive grid connections, involves high levels of embodied carbon emissions and substantial resource depletion. This carbon footprint from manufacturing and construction must be fully accounted for, as it diminishes the net environmental gain of the project.

- Peat and Ecology Risk

The construction on land containing peat deposits carries a risk of peat slippage, and the necessary drainage and excavation will cause significant, irreversible damage to this carbon-storing habitat. The resultant release of stored carbon contradicts the fundamental goal of climate change mitigation.

Judicial and Planning Precedents

We note that both judicial and planning authority decisions increasingly recognise the importance of preventing nuisance, environmental harm, and negative impacts on communities and property values. In particular, the **Gibbets Hill Windfarm case (Wexford v. Byrne and Moorhead)** is significant. Following 11 days of contested hearings, the defendants admitted liability for nuisance. Although compensation and remedies are still to be determined, this case establishes that claims regarding noise, light flicker, visual intrusion, and impacts on property values caused by nearby industrial operations - including wind farms - cannot be dismissed or treated as inadmissible in planning considerations.

Additionally, planning permission was recently refused by **Clare County Council** for a three-turbine wind farm (Moanmore Lower Green Energy Ltd) near Moyasta, Co. Clare, demonstrating a planning precedent for rejecting large-scale wind developments in sensitive rural and coastal locations.

In light of these precedents, we urge the Board to reassess the proposed wind farm location and to consider alternatives with fewer negative impacts on the environment, community, and economy. Options such as offshore wind development or optimisation of existing renewable energy

infrastructure with energy storage solutions could support renewable energy objectives while minimising harm to residents, property values, and local amenity.

Summary

In summary, the proposed development would cause unacceptable environmental, visual, acoustic, economic, and social impacts. The lack of full, frank photomontages, robust noise and shadow-flicker assessments, and dark sky evaluation prevents a proper appraisal of impacts. In line with judicial and planning precedent, the Board should refuse the application or defer determination pending comprehensive and transparent assessment.

We respectfully request that the Board give careful consideration to these objections and ensure a thorough evaluation of all social, environmental, and economic implications. Supporting references and documentation regarding the studies and cases cited are available on request.

Yours faithfully,



Chris Warren & Hester Casey