

## Observation

Re: Application Number: PAX07.323699

**Proposal by RWE Renewables Ireland Limited to erect eleven wind turbines of 180m within the townlands of Beagh, Beagh More, Cloonbar, Cloonmweelaun, Cloonaglasha, Cloonteen, Corillaun, Derrymore, Ironpool, Shancloon, Toberroe and Tonacoleen, Co. Galway.**

**Request for planning permission lodged on 19.09.2025**

To whom it may concern,

We, the undersigned, believe it is essential that An Coimisiún Pleanála, in considering this application, take account of the fact that the EIAR is fundamentally flawed and is not fit for the purpose intended in allowing a full and robust assessment of the likely significant effects of the proposed development on the receiving environment direct or indirect, or in combination with other effects. The criteria for these considerations of what must be assessed and considered is set out in the criteria of projects falling under the remit of the EU EIA Directive 2011/92/EU as amended by 2014/52/EU under Article 3(1).

An Coimisiún cannot permit this development on the basis of an inadequate adherence to the regulations of this Directive and therefore must refuse.

Council Regulations (EU) 2022/2577 permits streamlining of permit granting processes for renewable energy projects. This does not set aside the obligations for proper environmental assessment and the identification of likely significant and cumulative impacts of a proposed project on the receiving environment.



Dr Micheline Sheehy Skeffington,

Emerita, Botany & Plant Science,

College of Science & Engineering,

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with

Dr Caitríona Carlin, Professor Mike Gormally FRES and Dr Chris Williams FRES  
(signatures at the end of the document)

## **Competencies of the signatories:**

**Dr Micheline Sheehy Skeffington:** Second ever Irish President of the Botanical Society of Britain & Ireland (2023-4). Internationally recognised plant ecologist with more than 30 years at the Botany Department, University of Galway where she gained extensive research experience and numerous peer-reviewed publications relating to peatlands, turloughs, wetlands and grasslands.

**Dr Caitríona Carlin:** Ecologist and Lecturer in Environmental Science, Applied Ecology Unit, University of Galway and previously employed by Natural England (UK). She has more than 20 years of experience in nature conservation, habitat management and nature restoration.

**Professor Mike Gormally FRES:** Ecologist with more than 30 years of experience at the Applied Ecology Unit, University of Galway with numerous peer-reviewed publications on turloughs, peatlands, grasslands and invertebrates.

**Dr Chris Williams FRES:** Associate Editor of the international journal "Wetlands" and Member of the British Ecological Society and Fellow of the Royal Entomological Society. Ecologist and Senior Lecturer at Liverpool John Moores University (UK) with more than 20 years research experience and extensive publications on turloughs and peatlands.

**Date:** 16.11.2024

It is our expert opinion that the proposed site for the Shancloon Wind Farm is ecologically unsuitable for a development of this nature for the reasons outlined below.

1. **Inadequate Ornithological Assessment in a Turlough-Dense Landscape**
2. **Placement of Turbines on Raised Bogs**
3. **Inadequate Consideration of Protected Invertebrates (Marsh Fritillary Butterfly)**
4. **Misclassification and Underassessment of Cloonbar East Wetland**

## **1. Inadequate Ornithological Assessment in a Turlough-Dense Landscape**

The EIAR fails to account for the high density and ecological complexity of turloughs within a 15 km radius of the proposed site - at least 114 turloughs, covering approximately 21 km<sup>2</sup>, as identified in University of Galway research. These ephemeral wetlands are EU Priority Habitats that support large populations of overwintering and migratory birds in this region. The complexities caused by the irregular flooding patterns of so many turloughs in the area make it impossible, based on current scientific knowledge, to predict, with any confidence, the potential impacts of the proposed windfarm on these overwintering birds.

Bird behaviour in this landscape cannot be assessed using Scottish Natural Heritage (SNH) guidelines used for the EIAR. These guidelines were designed for permanent wetlands such as rivers and lakes and, therefore, cannot be applied in turlough dense areas given the variability in turlough flooding within and between years. The reliance of the EIAR on SNH guidelines in conjunction with national datasets which have significant gaps, has led to a severe underestimation of bird activity as demonstrated by University of Galway research in the area using acoustic monitoring and UAVs (Unmanned Aerial Vehicles or Drones).

Recent peer-reviewed research (Schindler et al., 2025)<sup>1</sup> confirms that the foraging range of the Greenland White-fronted Goose extends to 15 km, placing the proposed development well within the range of this species which is a Qualifying Interest for the Lough Corrib SPA (< 10km from proposed development). The same applies to a range of other bird species which are Qualifying Interests for the Lough Corrib SPA including Gadwall, Pochard and Tufted Duck. Passive acoustic monitoring by the University of Galway has also confirmed night-time activity (not recorded in the EIAR) by multiple red - and amber-listed species and the presence of the Greenland White-fronted Goose (Annex I species) within the footprint of the proposed windfarm – this species was excluded as a key ecological receptor in the EIAR because it was not recorded during the vantage point surveys undertaken for the EIAR.

**In summary:** The ornithological section of the EIAR omits crucial ecological dynamics unique to turlough regions and underestimates avian collision risk and omits the presence of an Annex I species. We also note that the University of Galway has been granted funding to undertake research on two Annex I species in the area as a first step in understanding (using GPS collars), for the first time, how these two species utilise the constantly changing wetland landscape in a turlough-dense area. As scientists, we are concerned that to proceed with the development would jeopardise this research. Therefore, until the complexities regarding turlough use by overwintering birds are better understood through research, the precautionary principle must apply.

## **2. Placement of Turbines on Raised Bogs**

Almost half of the 11 proposed turbines are to be located on or adjacent to three bogs.

An independent survey by peatland specialist (Smith, 2024)<sup>2</sup> who surveyed just over a third of one of the bogs at Cloonbar, described the conservation value of Cloonbar Bog as “surprisingly high”. He identified 5.8 ha of Annex I “active raised bog (\*7110”) which includes a central ecotope, the highest quality raised bog habitat. This area supports a greater proportion of the Annex I “active raised bog (\*7110”) habitat than 20% of Ireland’s SACs for which raised bog is a Qualifying Interest.

The development contravenes **EU Regulation 2024/1991 on Nature Restoration**, which requires the rewetting and restoration of drained peatlands by 2050 to mitigate climate change. Installing turbines on these sites would irreversibly damage their hydrology, carbon storage potential, and biodiversity, undermining both **EU and national climate and biodiversity objectives**.

## **3. Inadequate Consideration of Protected Invertebrate (Marsh Fritillary Butterfly)**

The **Marsh Fritillary** (Annex II of the Habitats Directive) has been recorded by Professor Mike Gormally near Turbine 9. The EIAR, however, records the species as absent based on a single day’s survey of caterpillar webs in late August 2022 - a breach of best practice, which requires repeated surveys across multiple years and the inclusion of adult flight periods.

This methodological deficiency means the EIAR conclusions i.e. that Marsh Fritillary is not a key ecological receptor for the development, is invalid. The proposed development risks fragmenting existing colonies and disrupting essential habitat connectivity, particularly given the up to 2 km dispersal requirement for the species between patches.

## **4. Misclassification and Underassessment of Cloonbar East Wetland**

Cloonbar East Wetland (the “Commonage”) has been incorrectly classified in the EIAR as Dry-Humid Acid Grassland (GS3). Independent botanical surveys by plant ecologists, Drs Sheehy Skeffington and Steven Sylvester, identified at least three potential **EU Annex I habitats** on this site, including *Transition Mire (7140)*, *Orchid-Rich Calcareous Grassland*, and *Wet Heath (4010)*.

Over 90% of plant species recorded by the independent experts above were absent from the EIAR species list, including the **Near Threatened Autumn Gentian** (*Gentianella amarella subsp. hibernica*). The omission of this data, coupled with

surveys conducted largely outside the growing season, renders the EIAR habitat assessment for this site invalid.

## 5. Conclusion

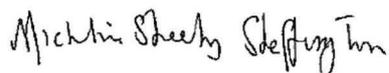
Given the fundamental deficiencies in survey methodology, data interpretation, and compliance with EU environmental legislation, it is not possible to determine the potential ecological impacts of the Shanclon Wind Farm with scientific or regulatory confidence.

The proposed development threatens:

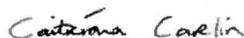
- Multiple **EU Priority Habitats (turloughs, raised bogs, and Annex I wetlands)**;
- **Annex I bird species** and an **Annex II invertebrate**;
- Ongoing **national and international biodiversity research** based in the area; and
- Ireland's obligations under the **EU Nature Restoration Law (2024)** and **EU Biodiversity Strategy for 2030**.

For these reasons, we respectfully request that **An Coimisiún Pleanála** refuses **permission** for the proposed Shanclon Wind Farm.

**Yours faithfully,**

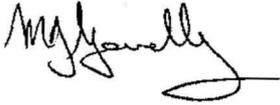


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**References:**

1. Schindler, A R, Fox, A D, Walsh, A J, Griffin, L R, Kelly, S B A, Cao, L & Weegman, M D (2025). Habitat conditions during winter explain movement among subpopulations of a declining migratory bird. *Movement Ecology*  
<https://doi.org/10.1186/s40462-025-00600-2>
2. Smith, G (2024) Cloonbar Bog Ecological Survey. Commissioned by Friends of Kilconly Wetlands. Blackthorn Ecology. 21pp.