

Ms E Hayes

Nicker

Pallasgreen

Co. Limerick

November 16<sup>th</sup>, 2025

Re: Objection to Proposed Shancloon Wind Farm (**Planning Number: 323699**) - Impacts on Overwintering Birds and Wetland Habitats

Dear Sir / Madam,

I am writing as a long-time and active birdwatcher and I wish to lodge a strong objection to the proposed wind farm due to its potential and likely impacts on the overwintering birds in the area. Apart from birds, I have a strong connection with the Kilconly area in that I have many relatives living in the area including a niece and nephews as well as many cousins.

#### 1. Importance of the area for overwintering birds

The ornithology section of the EIAR does not do justice to the numbers of overwintering waterbirds that can be found in this area each winter. What makes this area really special for birds is that the landscape has a very high concentration of turloughs or disappearing lakes. While this provides ample feeding and roosting opportunities for the birds, the birds have to move around a lot because the turloughs are filling and emptying throughout the winter depending mostly on the rainfall levels at any one time. So, unlike when I go bird-watching at a lake and see the same suite of species for weeks at a time, I could go to the same turlough and each day the bird composition could be different. I'm always wondering "*where did they go this time and why?*" or "*why did they decide to come back having only left a few days ago?*". Nobody I have talked to seems to know the answer to these question. The turloughs in Ireland are unique compared to temporary wetlands in other countries because sitting on the western edge of Europe, we get a lot of rain, so much so that some turloughs even flood during a wet Summer.

My real concern is that many of these turloughs surround the area for the proposed windfarm. Depending on the rainfall levels, it is likely that the birds flying across the area where the turbines are going, are going to fly in different directions on different days depending on which turloughs are flooded at the time. The bird surveys in the EIAR did not take this into account and there are no studies that I am aware of that have studied how overwintering birds use turloughs compared to lakes. Even the annual I-WeBs winter

bird surveys only survey a few of the many turloughs in the area so getting a complete picture of bird abundances is not currently possible.

## 2. Collision Risk and Disturbance from Turbines

Large wind turbines pose well-documented risks to birds through collision, particularly in areas of high flight activity such as feeding routes, commuting paths, and roosting-site corridors. Overwintering birds often travel at low to medium altitudes between turlough roosts, placing them directly in the height band swept by turbine blades.

In addition to collision risk, the visual presence of turbines and increased noise or human activity during construction and operation may cause avoidance of the area altogether. For species already under pressure, displacement from high-quality habitat can have serious long-term effects.

## 3. Sensitivity of Bogs and Turloughs

Five of the proposed wind turbines will be on raised bog, a highly sensitive habitat that supports rich invertebrate communities and hydrological conditions crucial for sustaining winter bird populations. Disturbance to hydrology from turbine foundations, drainage works, or access roads could degrade these habitats, reducing food availability and making them unsuitable for the birds that return each year.

## 4. Cumulative Biodiversity Impact

This region is already under pressure from habitat loss, drainage, and fragmentation. Introducing a wind farm into some of the best intact wetland complexes would add further stress to bird populations whose declines are well-documented both nationally and across Europe.

## Conclusion

As someone who has spent many years observing the birds, I believe the proposed wind farm poses an unacceptable risk to overwintering bird populations and to the integrity of the habitats themselves. For these reasons, I respectfully request that planning permission for Shancloon Wind Farm be refused.

Thank you for considering my objection.

Yours faithfully,

*E Hayes*