

Kayakmor –

Galway Kayak Tours/ Jim Morrissey

Luimnagh West

Corrundulla

Co. Galway

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9th November 2025

To:

An Coimisiún Pleanála / An Bord
Pleanála

64 Marlborough Street

Dublin 2

10th November 2025

RE An Coimisiún Pleanála - Case reference: PAX07.323699

PROPOSAL FOR 11 approx.180 M HIGH WIND TURBINES AND GROUND WORKS TO

SUPPORT THEM in the townlands of Beagh, Beagh More, Cloonbar,

Cloonweelaun, Cloonnaglasha, Cloonteen, Corillaun,

Derrymore, Ironpool, Shancloon, Toberroe and Tonacooleen,

Co. Galway.

I'm submitting the following strong objections to the proposed Shancloon "Renewable Energy" Development, Co. Galway – comprising Eleven industrial scale wind turbines up to 185m height and their associated Substation at Toonaculeen with a connection to Eirgrid Substation on behalf of myself Jim Morrissey, and my company Kayakmor – Galway Kayak Tours. I feel strongly that the proposed windfarm is a threat to my business, the wellbeing & health of surrounding communities and the rural environment (including wildlife) of North Galway.

About us Set up in 2007 Kayakmor-Galway Kayak Tours is an outdoor activity provider that runs kayaking tours on the River & Lough Corrib as well as the other two western lake Lough Mask & Lough Carra. We are on our 18th season and our customers consist of tourists, locals, work groups, students, scouts, clubs, stag & hens parties, etc. Our kayaking activities regularly feature on the top ten things for visitors to do in Galway, making us a valuable tourism asset for both Galway City & Galway county. We have previously objected to the Enerco proposed development of 8 x Turbines at Laurclavagh.

Here are the list of objections headings;

1. (IL)LEGALITY
2. Damage to AMENITY
3. Damage to ENVIRONMENT
4. Damage to WILDLIFE
5. SHADOW FLICKER, LIGHT AND NOISE DISTURBANCE
6. HOUSE PRICE DEVALUATION AND ECONOMIC HARDSHIP
7. Social cost

1.) Legality

I believe it is essential that The Bord, 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).

The Bord 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.

2) Damage to Amenity

Nature of Objection – *Damage to the amenity value of the Lough Corrib environs arising from this proposed development.*

As an outdoor activity provider, the preservation of an unsullied rural backdrop & vibrant wildlife in our area of operations is of prime importance. Being afloat on the Western Lakes promotes a sense of peacefulness & wellbeing at the same time as providing an intimate platform to view the wildlife on & near the water. We pledge to safeguard this resource & I feel strongly that the proposed development by RWE at Shancloon/Cloonbar would damage the unique amenity & tourism /recreation value of the Lakes- as well as be harming to overall wildlife of North Galway. Over 18 seasons our customers have been charmed by their wilderness experience amid the unspoilt rural backdrop of Lough Corrib, Mask & Carra & marveled at the richness of the wildlife encountered within a mere 10-20min drive from the city. A significant proportion of the birdlife encountered on the lakes; Mallard Ducks, Greylag & Brent Geese, Swans, Cormorants, Shags, Oystercatchers, Dunlins, Whimbrels & White-tailed Sea Eagles travel between the lake and the hinterland and our concern would be that locating an array of whirling turbines blades pose a huge risk of death & injury to these.

Visually, a towering wind farm a mere 12km North east of the lakeshore on flat hinterland would be very visible & disruptive essentially hemming in the open space of the lake between wind turbine farms both to the East & West. As a local business engaged in tourism we were not consulted by the developer as part of any Strategic Environmental Assessment SEA.

The proposed RWE development is one of several windfarms mooted for the North Galway area East of the Corrib. Enerco have submitted planning proposal for 8 x 185m turbines in Laurclavagh in 2024. The proposed latest generation turbines at 185m height would tower above the flat land of North County Galway, and if sited at Shancloon/Cloonbar would dominate the landscape and be visible 70km away on a clear day. Already the wind farms on the western side of the Corrib by Moycullen & Oughterard have diminished the amenity value of the lake for residents and tourists both. By day their out of sync spinning catches & distracts the eye & breaks up the natural hill ridge profile. By night dozens of glaring red warning beacons on the turbine tops (light pollution) are clearly visible 50-60km distant across the Corrib. Time has not softened the shock of seeing the turbines across the lake. They are alien structures and massively obtrusive. Significantly not one community on the eastern side of the lake was consulted during the planning stages for the Western wind farms.

Incredibly we still see inadequate Windfarm guidelines from 2006 in use despite huge changes in the industry, and the deployment of much larger scale turbines.

Given this oversight an immediate moratorium on ALL wind turbine proposals should be put in place till appropriate new guidelines that take into account the health and wellbeing of the environment and local communities are produced.

Destruction of view North from nearby Knockma Hill. As one of thousands of regular (couple of times/week) walkers of nearby Knockma hill I'm appalled at the possibility of the treasured view North from the summit being destroyed by the 11 x proposed massive turbines in Shancloon located approx.. 6-7km to the North West of the hill. Knockma at 165m elevation is the only Hill in town on the otherwise mostly flat limestone plain of East Galway. Accordingly, Parks & Wildlife have invested significantly in developing the walking trails at Knockma in recent years and have plans to build an interpretive centre on the summit to capitalize on the view. Why an interpretive centre would be built to view a landscape desecrated amid a thicket of towering wind turbines makes no sense. Significantly the tip height of the proposed turbines giant are 25metre taller than Knockma hill.

3 & 4) Environmental destruction & threat to Wildlife

Threat of wholesale death & injury to Birdlife, Bats, insects

Putting aside the extensive destruction of habitat and the death that would ensue directly by excavation during the construction phase the Danger of death & injury to local wildlife & birdlife directly from an array of 11 x whirling turbine blades travelling at speeds up to 180kmh at the tip would be inevitable and unacceptable. Turbine blades are harder to avoid in Low visibility caused by heavy rain, morning mist & fog. Birds & bats may dodge one but get thwacked by another falling blade in the turbine array. Disorientation of senses is likely due to the turbine noise, disturbed air, changes in air pressure increasing stress and causing slower reaction time to aviary predators as well. This despite the glossing over of such devastation by RWE in their laughably optimistic conclusions to the EAIR The richness of biodiversity of the bog has been pointed out to them yet they blithely assert that no lasting harm will come from their massive development.

The EIAR mentions some of the findings such as the following birds listed on Annex I of the EU Birds Directive (2009/147/EC) recorded in the area:

- **Common Kingfisher** (*Alcedo atthis*)
- **Common Crane** (*Grus grus*)
- **Corn Crane** (*Crex crex*)
- **Dunlin** (*Calidris alpina*)

- **European Golden Plover** (*Pluvialis apricaria*) / **Golden Plover**
- **Golden Eagle** (*Aquila chrysaetos*)
- **Greater White-fronted Goose** (*Anser albifrons*)
- **Hen Harrier** (*Circus cyaneus*)
- **Little Egret** (*Egretta garzetta*)
- **Merlin** (*Falco columbarius*)
- **Peregrine Falcon** (*Falco peregrinus*)
- **White-tailed Eagle** (*Haliaeetus albicilla*)
- **Whooper Swan** (*Cygnus cygnus*)

Also the red list birds:

- **Eurasian Curlew** (*Numenius arquata*)
- **European Golden Plover** (*Pluvialis apricaria*)
- **Northern Lapwing** (*Vanellus vanellus*)
- **Kestrel** (*Falco tinnunculus*)
- **Eurasian Woodcock** (*Scolopax rusticola*)
- **Pochard** (*Aythya ferina*)
- **Common Redshank** (*Tringa totanus*)
- **Meadow Pipit** (*Anthus pratensis*)
- **Northern Shoveler** (*Anas clypeata*)
- **Corn Crake** (*Crex crex*)
- **Barn Owl** (*Tyto alba*)
- **Bewick's Swan** (*Cygnus columbianus subsp. bewickii*)
- **Red Grouse** (*Lagopus lagopus*)
- **Redwing** (*Turdus iliacus*)
- **Snipe** (*Gallinago Gallinago*)

To refresh our memories about Annex 1

Background on the Birds Directive

The birds Directive Annex 1 is a list of bird species that are given special protection under the European Union's Directive on the Conservation of Wild Birds. This directive, also known as the Birds Directive, was adopted in 1979, coming into force in 1981 and aims to protect wild bird populations in the EU through habitat conservation and other measures. Annex 1 lists 194 species and sub-species of birds that are considered threatened in Europe and require enhanced conservation efforts from EU member states. The directive requires EU members to designate Special Protection Areas for endangered species listed in Annex 1 as well as for migratory birds. It also establishes rules around hunting seasons and methods in order to protect wild birds.

The goal of the Birds Directive is to maintain populations of naturally occurring wild birds by preserving, maintaining, and re-establishing sufficient areas of habitat for them. ***Under the directive, member states are required to take special conservation measures to ensure the survival and reproduction of Annex 1 species within the EU. They must also preserve, maintain, and re-establish biotopes and habitats to include the creation of protected areas,*** management of habitat features, and reestablishment of destroyed biotopes.

While initially focused only on Annex 1 species, the Birds Directive also requires member states to protect migratory bird species that are not threatened but could benefit from habitat conservation measures. The directive applies to birds, their eggs, nests and habitats and covers the entire lifespan of birds – protecting them from deliberate capture or killing as well as indirect harm from pollution or habitat degradation.

Key Provisions

Some of the key provisions of the Birds Directive include:

- Creation of Special Protection Areas for threatened and migratory species
- Protection and management of habitats inside and outside protected areas
- Measures for sustainable hunting and harvesting
- Ban on large-scale non-selective killing and capturing methods
- Prohibition of sale or keeping of most wild birds
- Requirement for member states to undertake research and monitoring

By setting minimum standards for avian protection across the EU, the Birds Directive aims to limit differences in implementation between member states so that threatened species receive equal levels of protection throughout their range.

The Birds Directive - Environment - European Commission

For threatened **bird species**, Member States must classify Special Protection Areas (SPAs) for 197 **species** and sub **species** listed in **Annex I** of the **Birds Directive**, as well as for other migratory **birds**, paying particular attention to the protection of wetlands of international importance.

The current status of the regularly occurring Irish bird species is assessed using the Birds of Conservation Concern (BoCCI) guidelines (Colhoun & Cummins, 2013). The last assessment covered the period 2014-2019 and all species assessed as Amber and Red are given in the checklist.

Bats are protected by law in the Republic of Ireland under the Wildlife Act 1976 and subsequent amendments. In Northern Ireland, bats are protected under the Wildlife (Northern Ireland) Order 1985. In both jurisdictions there is a similar level of protection; it is an offence to intentionally disturb, injure or kill a bat or disturb its resting place and any work on a roost must be carried out with the advice of the National Parks and Wildlife Service in the Republic, or the Northern Ireland Environment Agency in Northern Ireland.

In addition to domestic legislation bats are also protected under the EU Habitats Directive (92/43/EEC). The lesser horseshoe bat which is found in the Republic of Ireland only is listed in Annex II of the EU Habitats Directive, while all bat species are listed in Annex IV of the same Directive. The EU Habitats Directive has been transposed into both Irish and Northern Irish law with the European Communities (Birds and Natural Habitats) Regulations 2011 and the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 as amended.

Bats are extremely common in the Seancloon/Cloonbar area and would be placed under direct threat from any turbine development.

850nm near infrared lights are recommended to be used as obstacle lighting on the turbines to warn aircraft yet high-intensity 850nm infrared (IR) light can be harmful to wildlife and affect dark skies by disrupting nocturnal ecosystems and potentially contributing to light pollution. Excessive IR light can harm nocturnal animals that rely on darkness for navigation in migration, hunting, hiding and breeding, and its impact on human health, particularly on circadian rhythms, is an area of ongoing research.

Harm to wildlife and ecosystems

☒ Disruption of nocturnal species: Nocturnal animals use darkness for essential behaviors like hunting, hiding, and mating. Artificial light, including IR, can disrupt these behaviors.

☒ Pollinator impact: Research indicates that nocturnal pollinators rely on darkness to navigate, and artificial light can interfere with their function.

☒ General disruption: Any artificial light at night (ALAN) can have a detrimental effect on the delicate balance of nocturnal ecosystems, and IR light is no exception.

RWE would need to prove that this light is not harmful to us or ecosystems as I don't believe they have addressed this issue. Especially as these lights would be on 24 hours a day, 7 days a week.

Quotes from <https://darksky.org/resources/what-is-light-pollution/effects/wildlife-ecosystems/>

"Scientific evidence suggests that artificial light at night has negative and deadly effects on many creatures, including amphibians, birds, mammals, insects, and plants." "Migratory birds depend on cues from properly timed seasonal schedules. Artificial lights can cause them to migrate too early or too late and miss ideal climate conditions for nesting, foraging, and other behaviors." "Many insects are drawn to light, but artificial lights can create a fatal attraction. Declining insect populations negatively impact all species that rely on insects for food or pollination."

5) Threats to human health & wellbeing of community arising from wind turbines ,

Invisible Health effects widely reported by those living near wind farms include sleep disturbance, headaches, tinnitus, ear pressure, nausea, eye strain/blurring, vertigo, tachycardia, irritability, brain fog, anxiety and stress. The threat to public health from Infrasound (persistent low frequency vibrations of turbine blades) is real but is dismissed in the flawed EIR. The evidence internationally is growing and the precautionary principle is simple. If there is potential for harm to human health then No wind farm developments should be permitted.

Unforeseen modification of local weather

Experience elsewhere & recent studies are showing that local weather is disrupted & modified by arrays of wind turbines. The taller generation of turbines as proposed for Seancloon/Cloonbar reach up 600ft into the air and the rotating blades mix air from that altitude with lower air. The Wake effect downstream of turbines effecting rainfall etc. is not addressed in the proposer's submission.

Threat to Natural Drainage courses & Public Water Supply.

The RWE proposal would require installing 11 x wind turbine foundations in the Shanclon/Cloonbar area, and the building of 13km of access roadways. The 13km extent of bog and rural land

earmarked for roadways would be dug up, disturbed, infilled with limestone base & covered with top gravel to provide a smooth drivable surface. Disingenuously RWE proposals refer to many of these as 'floating roads' in some duplicitous manner as if to make out they are not just thousands of tonnes of Limestone dumped on the bog and land causing destruction. The Limestone for constructing access roads and foundation beds would come by thousands of 20-40 tonne truck loads creating pollution, massively increased traffic & noise disturbance problems. The effect of this proposed excavations on local drainage & water tables etc. is unknown and not addressed properly at all in the EIAR. The Removal of thousands of tonnes of Bog to insert turbine foundations and roads and their subsequent dumping on large spoil areas earmarked for Shanclon could well change existing drainage for the worst, it is notable that there is no record of flooding in the Shanclon & Cloonbar bogs up till now. What negative effects would this spoil have on the nearby Toghher river? The construction phase of a large project like this would undoubtedly create all manners of pollution.

Insufficient road network

The current road network surrounding Shanclon/Cloonbar is a mix of third-class roads which is inadequate for the purpose of transporting oversize loads of super long turbine blades and tower segments to the proposed sites. To enable adequate road width would entail large scale destruction of hedgerows on both sides of the lanes, the same hedgerows which in farming are protected. The 1800 metres of hedgerow & hazel grove destruction proposed by RWE during this process is way short of what would actually be required if the proposal went ahead. Their figures are simply not credible.

6) Disturbance, Noise, dust, inconvenience

Construction noise, excavation, dust, stressful traffic delays, road closures over extended construction phases are the infuriating realities that our communities would have to deal with in the event of their proposal going ahead. These are unacceptable. Trucks are unlikely to stick to agreed routes; inevitably expediency would rule and it would be a noisy, infuriating mess for the local communities

7) Significant Property Value losses /Shadow Flicker on surrounding houses

Property value losses near turbines is calculated as at least 25% @1.5km away from windfarm site and possibly up to 40% if closer. 1-2% loss within visual range which is 60km on a clear day. The proposed intrusion into our communities from this proposal places Thousands of houses under threat of varying degrees of devaluation. As a local homeowner this is unacceptable.

The devaluation of people's homes and the negative impact of this needs to be considered by ACP for this large scale turbine development. Many people in the North Galway area also work remotely from home so the proposed development has potential to damage their place of work. Legal cases from aggrieved neighbours to land owners who agreed access and rental to RWE could ensue.

Addressing the issue of house depreciation is completely lacking from the EIAR.

8) Social effects on communities – Divide & Conquer

RWE's proposal fails to take into account the considerations of the vibrant local communities of Shanclon/Cloonbar and environs dismissively referring to them as largely empty with odd 'one off rural housing' selecting pictures of derelict buildings etc.. Their cynical and underhand machinations

so far have replaced long valued trust in the community with suspicion and division. **Shame on them.**

It is totally unacceptable that our rural communities are essentially thrown to the wolves and have to mobilize individually against these serious threats to our future lives in rural Ireland. Windfarms are present in Ireland long enough for negative effects in both short, medium & longterm to manifest themselves. For example, evidence from these areas show that the next generation are less likely to settle in their homeplace area following the siting of windfarms close by. The area is spoiled and changed irrevocably, the connection between humans and the land is broken,

One of the most egregious aspects of these proposed developments is their dividing effect on the local community rural cohesiveness. Windfarm developers cynically use proven divide & conquer strategies to open up cracks in communities. The developers are well resourced carrying out plenty of homework and profile local residents to identify faultlines. Early in the process before anyone is aware of plans one-on-one social calls are tried on with targeted yet unsuspecting aging landowners & farmers to persuade them to agree to rental agreements of easement of land to permit works access. The land owners are not briefed by the developer companies of the full legal ramifications of entering into an agreement with them, for example the extent of loss of control over what happens on 'their' land and potential legal liability in the case that neighbours seek damages against the effects of the developments and resulting house depreciation.

In addition to the above points I believe this proposal:

Is in contravention of the Galway Development Plan

The developers acknowledge that under the GDP that the area has been classified as generally *unsuited to windfarms*. Despite the council having entirely solid reasons the developers RWE press ahead attempting to strong arm Galway County Council into changing their designation with the nonsense SDI classification. RWE's proposal submission is arrogant, inaccurate, insufficient, lacking substance, cynical & bullying in its tone. They have no business dividing and destroying the communities and environment of North Galway or anywhere on this island.

Thank you for reading my objections.

Yours sincerely

Jim Morrissey