

Submission to An Coimisiún Pleanála

SID Project :Shancloon Wind Farm

Reference : 323699

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Introduction

I, Martin Lavelle, am making this submission in relation to the proposed Shancloon Wind Farm application. Having reviewed the Environmental Impact Assessment Report (EIAR) and associated documentation, I have identified serious deficiencies, non-compliance issues, and risks that render this application unsuitable for approval. This submission sets out my observations and recommendations for refusal based on detailed analysis of the EIAR.

Executive Summary

I have identified multiple critical issues within the EIAR that, in my professional opinion, warrant refusal of this application. These issues include non-compliance with statutory requirements, misrepresentation of turbine output, safety and sustainability concerns, breaches of Wind Energy Guidelines, legal and property rights violations, environmental risks, and traffic inadequacies. Below, I outline my recommendations grouped under key themes.

Non-compliance with statutory requirements

- Failure to provide WindPro modelling software and design constraints (p.4).
- Omission of structural capacity reports for roads and bridges (p.1).

Misrepresentation of turbine output and SID eligibility

- Claimed output of 61.6–72.6 MW conflicts with actual 11.495 MW based on site wind speed (pp.8–9, 17).
- Reliance on “Export Capacity” rather than actual output, misleading SID qualification (p.17).

Safety and sustainability concerns

- Survival wind speed of Nordex turbine of 54.4 m/s inadequate for West of Ireland gusts (p.6).
- Karst collapse and doline risks not fully assessed (pp.79–91).
- Flooding risk underestimated; impermeable surfaces and karst collapse increase hazard (pp.50–51, 102–103).

Breach of Wind Energy Guidelines

- Separation distances below 7x rotor diameter; only two turbine pairs comply (p.21).
- Noise limits exceed permissible nighttime levels; cumulative turbulence effects ignored (pp.36–41).

Legal and property rights violations

- No landowner consent for accommodation works, cable trenches, and road widening (pp.22–24, 30–31).
- Approach contrary to High Court ruling in *Cremins v Dromada Windfarm* (2023) on trespass (p.24).

Environmental and biodiversity risks

- Significant decline in bird species; collision risk assessment based on outdated data (pp.63–69).
- Habitat loss and inadequate mitigation for Annex I habitats and protected species (pp.42–44, 55–56).

Traffic and infrastructure inadequacy

- 46,096 one-way loads (92,000 movements) on inadequate local roads; no swept path analysis provided (pp.114–115).
- Structural assessment for Clare River bridge omitted; risk to nacelle transport (p.52, 114).

Detailed Observations

- **Missing Documentation:** Windfarm modelling software and structural capacity reports not submitted (p.1).
- **Turbine Design Issues:** Larger turbines proposed despite site windspeed limitations, likely to exploit SID process (p.3).
- **Output vs Capacity:** Ambiguous use of “output” instead of “capacity output” (pp.4–5).
- **Separation Distances:** Only turbines T4–T5 and T10–T11 meet 7x rotor diameter requirement (p.21).
- **Landowner Consent:** Absent for accommodation works and cable trenching (pp.22–23).
- **Legal Compliance:** Temporary works violate property rights and High Court precedent (p.24).
- **Noise Assessment:** Nighttime permissible noise levels exceeded; cumulative effects ignored (p.36).
- **Flooding & Karst Risk:** Impermeable surfaces and karst collapse risks underestimated (p.51).
- **Ornithology:** Outdated collision risk models; non-compliant with Precautionary Principle (p.69).
- **Traffic & Haulage:** Underestimated traffic volumes; structural inadequacy of local roads for turbine delivery (p.115).

Conclusion

Based on the above observations and recommendations, I respectfully request that An Bord Pleanála refuse permission for the Shanclon Wind Farm application. The deficiencies and risks outlined demonstrate that this proposal does not constitute proper planning or sustainable development.