

Cloonsheen, Cloghans Hill, Tuam, Co Galway

8<sup>th</sup> November 2025

**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 Tonacooleen, Co. Galway.**

**Request for planning permission lodged on 19.09.2025**

To whom it may concern,

I, 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.

As a physicist, I make the following points:

1. The baseline noise measurements and predictions expressed in Chapter 8 of this EIAR are reported in A-weighted decibels. This is an inappropriate and inadequate approach, regarding the infrasound component of the noise, as infrasound, according to International standards (ISO) should be reported with reference to a G-weighting [IEC 61672-1]. The assertions in this report regarding the likely noise impact of the wind turbine development, with reference to infrasound, are therefore invalid. Furthermore, it is known that infrasound can travel further distances than higher frequency sound (Bolin et al, 2014 Journal of the Acoustical Society of America, Vol. 135 (3), pp.1106-1114), but this is not acknowledged by the consultant.
2. I refer to the high-profile High Court ruling against a wind turbine development in Enniscorthy in 2024, the first private nuisance claim relating to wind turbine noise in the UK and Ireland. Regarding aerodynamic noise and amplitude modulation (AM), it is stated in section 8.3.3 that *"at present, there is no method for predicting OAM at any particular location before turbines begin operation based on the general features of a site or the known attributes of a particular turbine. Therefore, it is not possible to predict an occurrence of AM at the planning stage. It should also be noted that it is a rare event associated with a limited number of wind farms. While it can occur, it is the exception rather than the rule"*. Given the stark difference in height of the wind turbines proposed for Shancloon (which are 182 m: 33% taller than the Enniscorthy wind turbines), the aerodynamic noise will undoubtedly be more impactful, and I question, therefore, how aerodynamic noise and amplitude

modulation can possibly be considered a "rare event" in the context of the Shancloon Wind Farm development.

As a local dweller in the vicinity of the proposed Shancloon Wind Farm, I make the following point:

Regarding out of hours working during construction, section 8.7.1 of this report states that "*consultation with the local community is important in minimising the impacts and therefore any out of hours working would be agreed in advance with the local planning authority. In addition, residents will be informed of construction activities through the Community Liaison Officer*". Given the abysmal track record in community engagement of the developer of the proposed Shancloon Windfarm (who arranged to have information leaflets delivered to householders by a third party who could not provide any information), I have zero confidence that there will be any community liaison regarding out of hours working. It is already well recognised that the transport of wind turbine components in the Galway region routinely occurs at night. I am therefore deeply concerned about the negative impact on my local community of this development; this impact would include impaired access for emergency vehicles, both during working hours and out of hours.

Given the fundamental deficiencies in the EIAR, I respectfully request that **An Coimisiún Pleanála refuses permission** for the proposed Shancloon Wind Farm

Thank you for your consideration.

Yours faithfully



Associate Professor Miriam Byrne, PhD (Imperial College; Mechanical Engineering)