

Toberroe

Kilconly

Tuam

Co Galway

15 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, Toberoe and Tonacoolen, Co. Galway.**

**Request for planning permission lodged on 19.09.2025**

Dear An Coimisiún Pleanála

I am a visual artist living approximately 1 km from the proposed Shancloon Wind Farm development. My practice is rooted in the boglands near Kilconly, where several of the turbines are planned. I am also Artist-in-Residence with Friends of Kilconly Wetlands, a voluntary community group committed to protecting our local wetlands through restoration, education, and the arts.

My work is both personal and collaborative, exploring the physical and emotional landscape of these bogs, their history, and their ongoing place in community life. Work made here has been exhibited nationally and internationally, contributing to the wider movement of Irish artists engaging with peatlands as sites of culture, ecology, and memory.

My collaborative practice centres on the local community through events, exhibitions, and oral-history projects. I am also the founder and facilitator of *Bog Fam*, a community collective exploring our connection to this place, and a collaborator on *Tales from the Bog* with Friends of Kilconly Wetlands.

Both *Bog Fam* and *Tales from the Bog* represent living forms of intangible cultural heritage connected to Kilconly's peatlands. *Tales from the Bog* documents the knowledge, memories, and oral histories of older generations, preserving the cultural and ecological understanding embedded in the community. *Bog Fam* is a contemporary, participatory project in which community members collectively explore

their relationship to the bog through creative practice, dialogue, and shared experiences. Together, these projects safeguard and transmit the bog's cultural significance, fostering both personal and communal connections to this unique landscape.

In 2026, as part of the international digital arts festival *The Wrong Biennale*, an embassy will be held in Cloonbar Bog (the site of T10 &11) involving international artists and the local community.

## Observations

### Chapter 15 Archaeology, Architecture and Cultural Heritage

- It is stated that the methodology follows EPA (2003/2022) and ICOMOS/UNESCO guidance, both of which clearly define cultural heritage as including intangible elements such as arts, community practices, and local traditions. The *Convention for the Safeguarding of the Intangible Cultural Heritage* defines intangible heritage as:
  - (a) oral traditions and expressions, including language as a vehicle of the intangible cultural heritage;
  - (b) performing arts;
  - (c) social practices, rituals and festive events;
  - (d) knowledge and practices concerning nature and the universe;
  - (e) traditional craftsmanship.
- While the EIAR acknowledges intangible cultural heritage (folklore and placenames) it focuses almost entirely on tangible assets (archaeology and architecture)
- The chapter was prepared by archaeologists, who are qualified to assess tangible heritage but not necessarily the social, artistic, or community-based dimensions of living or intangible heritage.
- The intangible elements were assessed mainly through desktop research (historic records, place names, folklore archives), with no direct community engagement or field-based cultural study of our peatlands.
- A reference in the EIAR to a nunnery in Cloonbar as recorded in the Schools' Folklore Collection is also acknowledged locally to be referenced in *The Annals of The Four Masters*. This would have been picked up if community engagement had formed part of the assessment.
- Mitigation measures are provided only for tangible assets. There are no measures proposed to address potential impacts for ongoing arts, educational, or community use of the bog. This omission is significant because the bog is not

merely a landscape, it forms part of Ireland's cultural identity and the fabric of local community life, supporting memory, creativity, and shared experience.

- By excluding these living cultural dimensions, the EIAR does not fully reflect the bog's role as a site of intangible cultural heritage and social connection.

This also conflicts with adopted policy:

- **Galway County Development Plan 2022–2028** – Objectives CA 1 and CUH 1 aim to protect intangible cultural heritage assets and support the development of arts and cultural infrastructure that meets community needs, fosters creative activity, and enhances the cultural, social, and economic life of communities.
- **Galway County Heritage & Biodiversity Plan 2024–2030** – commits to “*support community-led arts and oral-history projects*” and to protect peatlands while promoting community education and cultural participation.
- **National Biodiversity Action Plan 2023–2030** – encourages creative and community engagement with biodiversity and recognises the link between cultural heritage, landscape and wellbeing.

My residency and creative work directly fulfil these objectives; the proposed development would undermine them.

## Chapter 6 Population and Human Health

- The EIAR's emphasis on distant, high-profile attractions, many of them 10–15 km from the proposed development, overlooks the nearer, everyday cultural and recreational assets, including the bog, local trails, community spaces, and the living heritage and identity connected to the landscape surrounding the proposed development site.
- The bog, as part of our local heritage and cultural fabric, is treated only as degraded land, not as a site of community interaction or cultural heritage.
- The reference to a Community Benefit Fund does not specify who qualifies as the 'community'. Experience from other wind farm developments suggests these funds often go to larger towns rather than the villages immediately affected. Such a fund cannot compensate for what is, for many members of the community, a lifelong connection to this landscape. The bog, as a site of artistic exploration and cultural development, would be irreversibly altered and no generic fund can replace this loss.

## Chapter 16 Landscape and Visual Impact

- The assessment relies primarily on desktop sources (maps, scenic routes, County Plans) and does not include specific community consultation, local interviews, or on-site observation of informal cultural and recreational use, contrary to EPA guidance and Guidelines for Landscape and Visual Impact Assessment (GLVIA3). Principles from the National Landscape Strategy (2015–2025) and the European Landscape Convention, which emphasise community perceptions and intangible heritage, are also not applied.
- Tourism and recreation references focus on distant designated sites (10-15km away) rather than the actual bog landscape where turbines are proposed. Informal trails, local walking routes, and contemporary cultural uses of the bog itself are not acknowledged, leaving a void in the assessment of real on-site activity.
- The assessment focuses on what can be seen (visual intrusion/obstruction) but does not assess how the landscape is experienced culturally. Experiential qualities central to the bog's value - soundscape, solitude, sense of remoteness, atmospheric conditions, and suitability for creative and contemplative practice - are not evaluated. By treating the bog purely as visual scenery or working landscape, the assessment underestimates its cultural and creative significance.
- The EIAR photomontages underrepresent the potential visual impact of the proposed turbines due to multiple technical deficiencies, including soft or out-of-focus backgrounds, pixelation, compression artefacts, blown-out skies, inconsistent lighting, and selective viewpoints that omit nearby residences. Seasonal inconsistencies and the absence of summer views further reduce their reliability. These issues are inconsistent with the SNH *Visual Representation of Wind Farms: Best Practice Guidelines* (version 2.2, 2017), which call for clear, high-resolution images. Many viewpoints also lack identifiable landmarks or references to nearby communities, including Kilconly village, making their relevance unclear. Taken together, these issues make it difficult for the public and decision-makers to accurately assess turbine visibility or landscape impact, and the fact that these are the only images ever provided further limits meaningful consultation.
- No night-time visual assessment has been provided, despite the need for mandatory aviation lighting during operation. The area is identified in the *Galway County Development Plan* as largely free from light pollution, and such lighting would fundamentally alter the night-time landscape character. It would also impact night photographers working in the bog.

## Conclusion

The proposed Shancloon Wind Farm development poses significant risks not only to the tangible environment of the boglands near Kilconly but also to their living cultural and creative heritage. The EIAR consistently prioritises desktop-based assessments of archaeology, architecture, and distant tourism assets, while failing to adequately recognise the bog as a site of ongoing cultural, artistic, and community significance. Intangible heritage - including oral histories, the arts, recreational and contemplative use, and local social connections - is largely overlooked, and no mitigation measures are proposed to safeguard these elements.

Through both individual and collaborative work, my practice engages with and carries forward the living cultural traditions and everyday relationships people have with this landscape. It nurtures community identity, transmits knowledge across generations, and contributes directly to the cultural and social objectives outlined in the Galway County Development Plan, the Heritage & Biodiversity Plan, and the National Biodiversity Action Plan. The proposed development would irreversibly disrupt these connections and diminish the bog's role as a site of creativity, memory, and communal life.

For a meaningful assessment of impacts, the bog must be considered not only as a visual and ecological landscape but as a living cultural space. Without proper recognition of its intangible assets, the EIAR underestimates the full significance of the site and the profound consequences this development would have for the community, heritage, and creative life of Kilconly.

This EIAR frames the "do-nothing" scenario purely as a lost renewable-energy opportunity. In reality, doing nothing would allow existing cultural, educational, and artistic activity to continue to grow - a positive outcome not acknowledged in the report.

For these reasons, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed development, as it would cause irreversible harm to a living cultural landscape of local, artistic, and communal importance.

Yours sincerely

Sarah Deane