

Submission from William Burke, Manusflyn, Belclare, Tuam, Co Galway, H54K292

I wish to make an observation in respect of the proposed RWE Shancloon Windfarm, **case number 323699**.

I have serious concerns at the scale of this development in our community and the lack of up-to-date guidelines used in its planning. The 2006 Wind Energy Guidelines are nearly 20 years old and do not account for the size of the turbines and scale of the proposed windfarm. The Guidelines are currently under review.

In this respect, I object for several reasons as follows:

Noise and Infrasound Impacts –The current application by RWE does not confirm that the proposed turbines could meet the noise requirements of the 2024 draft guidelines and relies on guidelines from 2006 when most turbines were 50m, not 185m as proposed by RWE. For context, the nearby hill of Knockma, the most dominant natural feature in the area is 170m in height. Noise from such a development will be audible several kilometres away.

Environmental Impacts – The proposed windfarm breaches the EU Birds and Habitats Directive 2009/147/EC. The area for the planned windfarm contains a very large population of birds, including several red list conservation birds, such as the hen harrier, meadow pipit, curlew, lapwing, snipe and kestrel.

There are several other birds protected under the EU Birds Directive and the National Wildlife Act of 1976, including the buzzard and the whooper swan, as well as the red listed Marsh Fritillary butterfly, and the rare lesser horseshoe bat. Windfarms are known to kill thousands of birds and bats each year, especially birds of prey who look down while flying. Several kestrels and buzzards have been frequently observed in this area. The area is surrounded by turloughs, which are EU listed as a priority habitat of community concern due to their unique nature and importance for the conservation of many bird species which move between these habitats and would be extremely vulnerable to collision, including the whooper swan and Greenland white fronted goose, both on decline in the west of Ireland.

The boglands in the area of the proposed windfarm will be severely threatened by the development. The proposal states that 101,174m³ of peat and 91,027m³ of spoil are to be extracted and replaced with 217,541m³ of quarried stone. Active raised bog is an EU Annexed Habitat which acts as vital carbon sinks. 1m of peat takes 1,000 years to form. This proposed development will remove up to 8m of raised bog, or 8,000 years of natural history. Disturbing them through excavation, piling and drainage can release stored carbon and cause irreversible environmental harm. Disturbing bog land and putting in kilometres of roads, along with huge turbines will dry out the bog and remove the chance of any future restoration work.

Impact on Water and Water Courses - The scale of the turbines and their construction also pose a threat to the underground water system in the area, and the potential of increased water displacement, contamination and flooding. The area for the proposed windfarm is a karst limestone landscape. Each turbine includes 16 piles drilled up to 17m deep, filled with steel and 800m³ of concrete, with another 800m³ of concrete for each base (17,600m³ in total, or over 7 Olympic sized

swimming pools of concrete), posing a massive risk of pollution of drinking water and severe damage to underground aquifers.

Many the proposed turbines are along the Togher River, a tributary of the Black River that feeds into the Corrib. Landslides, or land subsidence or peat slippage (which is the acidic and harmful to freshwater life) into the Togher River are a strong possibility. In 2003, a landslide of a bog at the Derrybrien Windfarm in South Co Galway had major impacts on the area killing over 50,000 fish. The Togher River and the Black River are spawning grounds for brown trout an important freshwater species and a major source of tourism in the North Galway/South Mayo area. With the increase in intense rainfall events in recent years, the possibility of a Derrybrien-like event such as landslides, or land subsidence or peat slippage occurring has greatly amplified since 2003, particularly in peatlands.

<https://www.independent.ie/irish-news/there-was-no-discussion-about-whether-its-the-best-thing-to-do-derrybrien-wind-farm-seeks-to-pack-up-leaving-70-turbine-foundations-behind/a2073665899.html>

Construction Impacts –It is estimated that 60,000 trips of heavy-duty vehicles will be needed during the construction of each turbine. Construction could take years, meaning prolonged periods of heavy construction traffic on our roads, many of which would not sustain them. The proposed windfarm will radically alter the scenery and serenity of this community, with turbines dominating the area. Turbines are equivalent to high-rise buildings and totally out of character with our landscape, contrary to good and sustainable planning. Indeed, the maximum permitted height of any building in Dublin city is 60m, less than one third or the height of the proposed windfarm.

Overall Benefit - Over 99.8% of RWE shareholders are located outside the Republic of Ireland. Corporate governance dictates that the primary duty of the board of any limited company is delivering value for its shareholders in the form of financial returns. RWE is not concerned with the environment or indeed the impacts their projects have on local residents, it is solely concerned with making profits, the vast majority of which in the case of the Shancloon Windfarm will be received by shareholders outside the state. Indeed, the largest single shareholder is Qatar Holdings based in the Middle East. The argument that wind energy gives Ireland cheap electricity is a misnomer. The startup costs associated with wind energy are astronomical, with costs are passed on to us, the consumers, in order to satisfy the demands the investor portfolios.